

December 28, 2006

## Via Electronic Filing

The Honorable Magalie R. Salas Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426

Re: Pacific Gas and Electric Company

Interim Dual Fuel Agreement - Humboldt Bay Power Plant
Interim Black Start Agreement - Humboldt Bay Power Plant,
San Joaquin Power Plant and Kings River Watershed

Docket No. ER07-299-000

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceedings is the Motion to Intervene of the California Independent System Operator Corporation.

Thank you for your attention to this matter.

Yours truly,

## /s/ Sidney Mannheim Davies

Sidney Mannheim Davies
Assistant General Counsel
Counsel for the California Independent
System Operator Corporation

Enclosure cc: Service List

# UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Pacific Gas and Electric	)	Docket No. ER07-299-000
Company	)	
	)	

# MOTION TO INTERVENE OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. § 385.214, and the Commission's December 11, 2006, Combined Notice of Filings, the California Independent System Operator Corporation ("CAISO") submits this Motion to Intervene in the above captioned proceeding. In support thereof, the CAISO states as follows:

#### I. DESCRIPTION OF THE PROCEEDING

On December 6, 2006, Pacific Gas and Electric Company (PG&E) tendered for filing two executed Interim Service agreements and accompanying schedules: Interim Dual Fuel Agreement (PG&E Rate Schedule FERC No. 233); and Interim Black Start Agreement (PG&E Rate Schedule FERC No. 234) between PG&E and CAISO. The Interim Agreements set forth the rates, terms and conditions under which PG&E will provide Dual Fuel and Black Start Services to the CAISO from Humboldt Bay Power Plant, San Joaquin Power Plant, and Kings River Watershed. PG&E requests the waiver of the notice period and any other waiver necessary for this filling to become effective January 1, 2007.

By its Notice issued December 11, 2006, the Commission established December 28,2006, as the date motions to intervene are to be filed in the above-captioned proceeding.

#### II. DESCRIPTION OF THE CAISO AND COMMUNICATIONS

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California with its principal place of business at 151 Blue Ravine Road, Folsom, CA 95630. The CAISO is the Control Area operator responsible for the reliable operation of the electric grid comprising the transmission systems of a number of utilities including Pacific Gas & Electric Company ("PG&E") as well as the coordination of the ancillary services and real-time electricity markets in California.

The CAISO requests that all communications and notices concerning this motion and these proceedings be provided to:

Sidney Mannheim Davies Assistant General Counsel California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630

Tel: (916) 608-7144 Fax: (916) 608-7222

E-mail: sdavies@caiso.com

Robert C. Kott Manager of Model and Contract Implementation California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630

Tel: (916) 608-5804 Fax: (916) 351-2487 E-mail: <u>rkott@caiso.com</u>

#### III. CAISO'S INTEREST

As the Control Area operator and as the counter party to the RMR Agreements, the CAISO has a unique interest in any Commission proceeding that affects an RMR Agreement. Accordingly, the CAISO has a direct and substantial interest in this proceeding and requests that it be permitted to

intervene. Because no other party can adequately represent the CAISO's

interests in this proceeding, the CAISO's intervention is in the public interest and

should be granted.

IV. CONCLUSION

For the foregoing reasons, the CAISO respectfully requests that the

Commission grant this Motion to Intervene and make the CAISO a party in the

above-caption proceeding with full rights of participation.

Dated: December 28, 2006

Respectfully submitted

/s/ Sidney Mannheim Davies

Sidney Mannheim Davies

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# **CERTIFICATE OF SERVICE**

I hereby certify that I have, this 28<sup>th</sup> day of December 2006, caused to be served a copy of the forgoing document upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

/s/ Sidney Mannheim Davies Sidney Mannheim Davies