

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Pacific Gas and Electric Company)
)
) **Docket No. ER00-902-000**

**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 29, 1999 Notice of Filing, the California Independent System Operator Corporation (“ISO”) hereby moves to intervene in the above-captioned proceeding. In support thereof, the ISO states as follows:

I. COMMUNICATIONS

Please address communications concerning this filing to the following persons:

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II. BACKGROUND

On December 23, 1999, Pacific Gas and Electric Company (“PG&E”) tendered for filing a settlement agreement between PG&E and Dynegy Power

Services, Inc. (“Dynergy”). PG&E states that the settlement agreement resolves a dispute between PG&E and Dynergy concerning the interpretation of the Control Area and Transmission Service Agreement (“CATSA”) between the two companies, and provides for the extension of the CATSA as a transmission-only agreement through December 31, 2001. PG&E Transmittal Letter at 2.

III. BASIS FOR MOTION TO INTERVENE

The ISO is a non-profit public benefit corporation organized under the laws of the State of California and responsible for the reliable operation of a grid comprising the transmission systems of Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company, as well as for the coordination of the competitive electricity market in California. PG&E states in its filing that the ISO has reviewed the settlement agreement and has consented to the extension of the CATSA; that the settlement agreement contains terms and conditions for the DC Intertie transmission service that conform to the ISO scheduling protocols and operations; and that Dynergy agrees to conform to ISO ancillary service requirements for parties taking services under the ISO Tariff. PG&E Transmittal Letter at 2-3. Based on these statements, the ISO believes that it has a unique interest in any Commission proceeding concerning the CATSA settlement agreement. Accordingly, the ISO requests that it be permitted to intervene herein with full rights as a party.

The ISO raises no substantive issues at the present time but reserves the right to do so in any further aspects of the proceeding ordered by the

Commission. The ISO also reserves the right to file supplemental comments if warranted.

IV. CONCLUSION

Wherefore, for the foregoing reasons, the ISO respectfully requests that the Commission permit it to intervene, and that it be accorded full party status in this proceeding.

Respectfully submitted,

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