

January 6, 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 Docket No. ER06-341-000

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceeding 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 Company ) Docket No. ER06-341-000

## 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 27, 2005, Notice of Filing, 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 16, 2005, Pacific Gas and Electric Company ("PG&E") submitted Revised Rate Schedule Sheets to the Reliability Must-Run Service Agreements with the CAISO. By its Notice issued December 27, 2005, the Commission established January 6, 2006, as the date motions to intervene are to be filed in the above-captioned proceeding.

#### II. DESCRIPTION OF THE ISO 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 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

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

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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: rkott@caiso.com

#### III. CAISO'S INTEREST

As the Control Area operator and as the counter party to the RMR

Agreement, 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.

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IV. STATEMENT OF ISSUES

The CAISO seeks to intervene in this proceeding with all rights attendant

to such status.

٧. 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: January 6, 2006

Respectfully submitted

/s/ Sidney Mannheim Davies

Sidney Mannheim Davies California Independent System Operator Corporation

151 Blue Ravine Road Folsom, CA 95630

(916) 608-7144 (tel)

(916) 608-7222 (fax)

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### **CERTIFICATE OF SERVICE**

I hereby certify that I have this 6<sup>th</sup> day of January 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