

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

Pacific Gas and Electric Company

)
)
)

Docket No. ER01-424-000

**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 November 17, 2000, 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:

Charles Robinson
General Counsel
Roger E. Smith,
Senior Regulatory Counsel

The California Independent System
Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
Tel: (916) 608-7135
Fax: (916) 351-4436

J. Philip Jordan
Michael E. Ward
Julia Moore
Swidler Berlin Shereff Friedman,
LLP
3000 K Street, NW
Suite 300
Washington, DC 20007
Tel: (202) 424-7500
Fax: (202) 424-7643

II. BACKGROUND

On November 13, 2000, Pacific Gas and Electric Company ("PG&E") tendered for filing a new Grid Management Charge ("GMC") Pass-Through Tariff. The purpose of the

pass-through tariff is to recover the costs proposed in the ISO's GMC filing of November 1, 2000, in Docket No. ER01-313-000.

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 PG&E, San Diego Gas & Electric Company, and Southern California Edison Company, as well as for the coordination of the competitive electricity market in California. The ISO is responsible for ensuring nondiscriminatory access to the ISO Controlled Grid. The ISO recovers costs associated with fulfilling these functions through its GMC. The method in which GMC costs are passed through to transmission customers could have an impact on access to the ISO Controlled Grid. ISO therefore has an interest in the allocation of the costs of among the users of the ISO Controlled Grid. This interest cannot adequately be represented by any other party. For the same reason, the ISO's participation in this proceeding is in the public interest. Accordingly, the ISO requests that it be permitted to intervene herein with full rights of 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.

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,

Charles Robinson
General Counsel
Roger E. Smith
Senior Regulatory Counsel
Beth Ann Burns
Regulatory Counsel
The California Independent
System Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630

J. Phillip Jordan
Michael E. Ward
Julia Moore
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W.
Suite 300
Washington, DC 20007

Attorneys for the California Independent
System Operator Corporation

Dated: December 4, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, DC, on this 4th day of December, 2000.

Julia Moore

December 4, 2000

The Honorable David P. Boergers
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: **Pacific Gas and Electric Company,
Docket No. ER01-424-000**

Dear Secretary Boergers:

Enclosed for filing are one original and 14 copies of the Motion to Intervene of the California Independent System Operator Corporation in the above-referenced proceeding. Two additional copies of the filing are also enclosed. Please stamp the two additional copies with the date and time filed and return them to the messenger.

Thank you for your assistance in this matter.

Respectfully submitted,

Julia Moore
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, DC 20007
Tel: (202) 424-7500
Fax: (202) 424-7643

Attorney for the California
Independent System Operator Corporation