

January 7, 2005

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. ER05-353-000

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 L. Mannheim

Sidney L. Mannheim Regulatory Counsel

Counsel for the California Independent System Operator Corporation

Enclosure

cc: Service List

UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

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Pacific Gas and Electric Company

Docket No. ER05-353-000

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, 2004 Notice of Filing, the California Independent System Operator Corporation ("ISO") submits this Motion to Intervene in the above captioned proceeding. In support thereof, the ISO states as follows:

I. DESCRIPTION OF THE PROCEEDING

On December 17, 2004, Pacific Gas and Electric Company (PG&E) tendered for filing an annual rate update, including rate schedule sheet revisions, to become effective January 1, 2005, to its Reliability Must-Run Service Agreements (RMR Agreements) with the ISO for Helms Power Plant (PG&E First Revised Rate Schedule FERC No. 207), San Joaquin Power Plant (PG&E First Revised Rate Schedule FERC No. 211) and Kings River Watershed (PG&E Rate Schedule FERC No. 226). By its Notice issued December 27, 2004, the Commission established January 7, 2005, as the date motions to intervene are to be filed in the above-captioned proceeding.

II. DESCRIPTION OF THE ISO AND COMMUNICATIONS

The ISO is a non-profit public benefit corporation organized under the laws of the State of California with a principal place of business at 151 Blue Ravine Road, Folsom, CA 95630. The ISO 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 and Electric Company ("PG&E"), as well as the coordination of the ancillary services and real-time electricity markets in California.

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

Sidney L. Mannheim Regulatory Counsel California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 916-608-7144 (tel) 916-608-7222 (fax) sjubien@caiso.com Robert C. Kott Manager of Reliability Contracts California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 916-608-5804 (tel) 916-608-7222 (fax) rkott@casio.com

III. ISO'S INTEREST

The ISO 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 ISO's interests in this proceeding, the ISO's intervention is in the public interest and should be granted.

V. CONCLUSION

For the foregoing reasons, the ISO respectfully requests that the Commission grant this Motion to Intervene and make the ISO a party in the above-caption proceeding with full rights of participation.

Dated: January 7, 2005

Respectfully submitted

Sidney L. Mannheim

Sidney L. Mannheim California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630

CERTIFICATE OF SERVICE

I hereby certify that I have this 7th day of January, 2005 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 L. Mannheim

Sidney L. Mannheim California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 (916) 608-7144 (tel) (916) 608-7222 (fax)