

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

Pacific Gas and Electric Company)

Docket No. ER10-2168-000

**MOTION TO INTERVENE AND COMMENTS OF THE CALIFORNIA
INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation submits this motion to intervene and comments on the August 10, 2010 filing by Pacific Gas and Electric Company of the unexecuted Large Generator Interconnection Agreement between PG&E, as both interconnection customer and participating transmission owner, and the ISO for PG&E's utility-owned Collinsville wind project generating facility.¹ The Collinsville LGIA is non-conforming to the ISO's *pro forma* LGIA, including provisions in Appendices A and B of the LGIA that modify the requirements for posting the financial security and payment of on-going operation and maintenance charges that would otherwise be required pursuant to Articles 11.5 and 10.5, respectively, of the LGIA. It is the ISO's understanding that the non-conforming provisions of Appendices A and B are intended to reflect the Commission's order in Docket No. ER09-1336 accepting the LGIA for PG&E's utility-owned Humboldt Bay repowering project generating

¹ The ISO submits this motion and these comments pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214, and the Notice of Filing issued in this proceeding on August 10, 2010. The ISO is responsible for processing and administering all requests for interconnections of generation projects to the transmission grid under the ISO's operational control and as a result has a unique interest in this proceeding. Accordingly, the ISO requests that it be permitted to intervene with full rights of a party. No other party can adequately represent the ISO's interests. The ISO is sometimes also referred to as the CAISO.

facility, in which the Commission granted a waiver of provisions of Article 11.5,² and the Commission's order in Docket No. ER10-733 accepting the LGIA for PG&E's utility-owned Colusa generating facility, in which the Commission accepted provisions modifying the provisions for payment of on-going operation and maintenance charges that would otherwise be required pursuant to Article 10.5.

Although the ISO has no objections to the provisions of Appendix A or the other appendices to this LGIA, the ISO deferred execution of this LGIA pending Commission action on PG&E's filing of the unexecuted version of this LGIA. In reviewing the unexecuted LGIA filed by PG&E, the ISO has determined that PG&E filed a version of the body of the LGIA that does not correspond to the designation of the appendices. While the appendices correspond to the *pro forma* version of the LGIA set forth in Appendix V of the ISO tariff, the body of the LGIA corresponds to the version set forth in Appendix Z of the ISO tariff. While this should have no significant substantive effect on the interconnection of PG&E's Collinsville project, the mismatch between the appendices and the body of the LGIA filed by PG&E could cause confusion in the implementation and future administration of the LGIA. As the ISO considers the appendices filed by PG&E to be appropriate, the ISO proposes that the Commission direct PG&E to revise the body of the Collinsville LGIA to reflect the *pro forma* version set forth in Appendix V of the ISO tariff to correspond to those appendices.

In any event, if the Commission accepts PG&E's filing in this proceeding, either conditionally or unconditionally, the ISO will work with PG&E to have the

² *Pacific Gas and Electric Co.*, 128 FERC ¶ 61,175 (2009).

LGIA executed and make it effective in accordance with the Commission's order. At that point, the ISO will submit its own filing of this non-conforming LGIA as its own service agreement in the Commission's eTariff system pursuant to the Commission's Order No. 714.

The ISO requests that the Commission take the foregoing comments into consideration in issuing its order on PG&E's filing.

Respectfully submitted,

By: /s/ Michael D. Dozier

Nancy Saracino
General Counsel
Sidney Davies
Assistant General Counsel
Michael D. Dozier
Senior Counsel
California Independent System
Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
Tel: (916) 608-7048
Fax: (916) 608-7222
E-mail: mdozier@caiso.com

Attorneys for the California Independent
System Operator Corporation

Dated: August 31, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of this document upon all parties listed on the official service list compiled by the Secretary in the above-captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated this 31st day of August, 2010, at Folsom, California.

Jane Ostapovich

Jane Ostapovich