



California Independent
System Operator Corporation

October 2, 2009

VIA ELECTRONIC FILING

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: Pacific Gas and Electric Company
Docket No. EL09-72-000**

Dear Secretary Bose:

Transmitted herewith for electronic filing in the above-referenced proceeding is the Motion to Intervene and Comments of the California Independent System Operator Corporation.

Thank you for your attention to this matter.

Yours truly,

/s/ David S. Zlotlow

David S. Zlotlow
Counsel

Counsel for the California Independent
System Operator Corporation

Enclosure

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

**Pacific Gas and Electric) Docket No. EL09-72-000
Company)**

**MOTION TO INTERVENE AND COMMENTS 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 September 8, 2009, Notice of Filing, the California Independent System Operator Corporation (“CAISO”) submits this Motion to Intervene in the above-captioned proceeding. The CAISO additionally submits initial comments in the above-captioned proceeding.

I. MOTION TO INTERVENE

A. Description of the Proceeding

On September 4, 2009, Pacific Gas and Electric Company (“PG&E”) filed a Petition for Declaratory Order and accompanying Declaration requesting a declaration from the Commission that PG&E will be allowed to recover through its electric transmission rates the costs it will incur as part of its participation in the Regional Synchrophasor Project. The Regional Synchrophasor Project, coordinated by the Western Electricity Coordinating Council, will seek to develop wide area monitoring, advance warning systems, and adaptive protection and controls in alignment with the CAISO’s Balancing Authority Area and neighboring systems.

B. Description of the CAISO and Communications

The CAISO 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 CAISO is the Balancing Authority and transmission operator responsible for the reliable operation of the electric grid comprising the transmission systems of a number of utilities, 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:

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C. CAISO's Interest

PG&E's role in the Regional Synchrophasor Project largely will involve installing Phasor Measurement Units (PMUs) at select PG&E substations. One of the uses of the data generated by the PMUs will be to aid the CAISO in its role as the Balancing Authority. 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.

II. COMMENTS

PMUs, as well as associated equipment like Phasor Data Concentrators, constitute probably the single most important type of transmission-level smart grid technology. PMUs can provide a grid operator near real-time visibility over system conditions. Such visibility can allow the CAISO and other grid operators to see problems develop and take remedial action more rapidly than they otherwise can based on current Supervisory Control and Data Acquisition systems. The end result is improved grid reliability and power quality. Such improvements benefit all users of the CAISO-controlled grid.

The CAISO will derive the greatest benefit from PMUs when they are deployed across a diverse geographic range of key points in the transmission system. Thus far, PG&E's deployment of PMUs has been somewhat limited, with only a handful of PMUs transmitting data to the CAISO. The CAISO expects that the data from the approximately 25 PMUs that PG&E intends to install as part of its participation in the Regional Synchrophasor Project will prove invaluable in providing the ISO a more complete view of overall system conditions. For this reason, the CAISO supports PG&E's participation in the Regional Synchrophasor Project.

Aside from these initial comments, the CAISO reserves the right to offer additional comments in this proceeding at a later point, as well as to raise further substantive matters, where warranted.

III. 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-captioned proceeding with full rights of participation. Additionally, the CAISO respectfully requests that the Commission consider its initial comments.

Dated: October 2, 2009

Respectfully submitted

/s/ David S. Zlotlow

David S. Zlotlow

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 2nd day of October, 2009.

Anna Pascuzzo
Anna Pascuzzo