

December 18, 2000

STATEMENT OF CLAIM PURSUANT TO
THE ISO TARIFF § 13.2.2

TO: California Independent System Operator
Mr. Richard Jacobs, Assistant Corporate Counsel
151 Blue Ravine Road
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California Independent System Operator
ISO Governing Board
Mr. Jan Smutney-Jones, Chair of the Board
151 Blue Ravine Road
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California Independent System Operator
ISO Governing Board
Mr. Charles F. Robinson, General Counsel
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American Arbitration Association
(as delegated agent for the ISO ADR Committee)
Ms. Molly Bargaquest, Vice President -
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1750 Two Galleria Tower
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Kelly M. Morton, Attorney
Law Department
Pacific Gas and Electric Company
San Francisco, CA 94120

FROM: Gregg D. Ottinger
Attorney for the Turlock Irrigation District

RE: Statement of Claims of the Turlock Irrigation District, pursuant to
ISO Tariff § 13.2.2

In accordance with Section 13.2.2 of the ISO Tariff, the Turlock Irrigation District ("TID") submits this Statement of Claim. This Statement of Claim relates to the Pacific Gas and Electric Company's ("PG&E") October 5, 2000 Statement of Claim regarding COTP and "bubble" charges from April 1, 1998 to April 1, 1999. In PG&E's Statement, among the entities listed as "Other Potentially Interested Parties" are "Holders of transmission entitlements on the California-Oregon Transmission Project ("COTP")." TID is a holder of transmission entitlements on the COTP and thus may be considered an interested party to this proceeding. While TID's participation in this proceeding also may be initiated through an intervention pursuant to the ISO Tariff Supplemental Procedure 3, TID is using the Statement of Claim procedure in order to ensure that all of its rights respecting this dispute are preserved.

While TID is generally aware of the parameters of PG&E's dispute with the ISO, TID is not in contractual privity with the ISO with regard to this matter and presently has inadequate information upon which to establish a binding position in this proceeding. Thus, on a preliminary and non-binding basis, and subject to change, TID submits the following as its Statement of Claim:

Parties to the Dispute:	ISO, PG&E
Other Potentially Interested Parties:	Western Area Power Administration, Sacramento Municipal Utility District, Holders of transmission entitlements on the COTP
Claim:	From April 1998 to April 1999, the ISO improperly billed PG&E for charges amounting to \$14,172,337.08.

Relief Sought: Reimbursement to PG&E of the \$14,172,337.08 in charges that the ISO lacked any tariff or contract right to impose on the Company, plus interest, and any other relief deemed just and reasonable.

Summary of Claims: TID refers to PG&E's October 5, 2000 Summary of Claim.

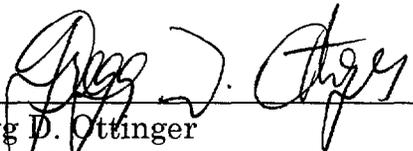
Knowledgeable Individuals: TID has no one to add to the list compiled by PG&E.

Service: TID requests the following individuals be designated for communications:

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Please contact Mr. Ottinger or Mr. Allen if questions arise.



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