



California Independent  
System Operator Corporation

August 14, 2006

**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. ER06-1332-000**

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceedings is the Intervention and Provisional Protest of the California Independent System Operator Corporation.

Thank you for your attention to this matter.

Yours truly,

**/s/ Sidney Mannheim Davies**

Sidney Mannheim Davies  
Assistant General Counsel  
Counsel for the California Independent  
System Operator Corporation

Enclosure  
cc: Service List



## **II. 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 its principal place of business at 151 Blue Ravine Road, Folsom, CA 95630. The CAISO is the Control Area operator responsible for the reliable operation of the electric grid comprising the transmission systems of a number of utilities including PG&E 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:

Sidney Mannheim Davies  
Assistant General Counsel  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 608-7144  
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California Independent System  
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## **III. CAISO'S INTEREST**

As the Control Area Operator and as the counter party to the RMR Agreement, the CAISO has a unique interest in any Commission proceeding that affects an RMR Agreement. 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.

#### **IV. PROVISIONAL PROTEST**

PG&E's proposed revised rate schedules reflecting revised ramp rates for Helms and San Joaquin are incorrect in that the Minimum Load table and the first segment of the revised ramp rates should be the same and in PG&E's filing they have different values and several ramp rates are missing or incorrect. Also, the effective date should be September 1, 2006 to coordinate with the changes PG&E will be submitting to update CAISO's Master File. The CAISO understands that PG&E is aware of this error and will be filing corrected rate schedule sheets in the near future.

#### **V. CONCLUSION**

For the foregoing reasons, the CAISO respectfully requests that the Commission grant this Provisional Protest and direct PG&E to file corrected rate schedule sheets reflecting the appropriate ramp rate tariff sheets if PG&E has not done so.

Dated: August 14, 2006

Respectfully submitted

**/s/ Sidney Mannheim Davies**  
Sidney Mannheim Davies  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
(916) 608-7144 (tel)  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have, this 14<sup>th</sup> day of August 2006, 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 Mannheim Davies**  
Sidney Mannheim Davies