

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

Pacific Gas and Electric Company

Docket No. ER03-299-000

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

Pursuant to 18 C.F.R. §385.214 and the Commission's December 26, 2002 Notice of Filing in this matter, the California Independent System Operator Corporation ("ISO") hereby files a motion to intervene in this proceeding. In support thereof, the ISO states as follows:

**I. COMMUNICATIONS**

Please address communications concerning this filing to the following persons:

<p>Jeanne M. Solé*  Regulatory Counsel  The California Independent System  Operator Corporation  151 Blue Ravine Road  Folsom, CA 95630  Tel: (916) 351-4400  Fax: (916) 608-7222</p>	<p>J. Phillip Jordan*  Rebecca A. Blackmer  Swidler Berlin Shereff Friedman, LLP  3000 K Street, N.W., Suite 300  Washington, DC 20007  Tel: (202) 424-7500  Fax: (202) 424-7643</p>
<p>Deborah A. Le Vine<sup>1</sup>  Director of Contracts  The California Independent System  Operator Corporation  151 Blue Ravine Road  Folsom, CA 95630  Tel: (916) 351-4400  Fax: (916) 608-7222</p>	

\* Individuals designated for service pursuant to Rule 203(b)(3), 18 C.F.R. § 203(b)(3).

## II. BASIS FOR MOTION TO INTERVENE

The ISO is a non-profit public benefit corporation organized under the laws of the State of California and responsible for the reliable operation of a grid comprising the transmission systems of a number of public utilities including PG&E, as well as for the coordination of the competitive Ancillary Services and real-time electricity markets in California. As the counter party in the RMR Agreements governing PG&E's provision of RMR services, the ISO has a unique interest in any Commission proceeding concerning proposed changes to those RMR Agreements. Accordingly, the ISO has a direct and substantial interest in the proposed rate changes and requests that it be permitted to intervene in this proceeding with full rights of a party.

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<sup>1</sup> In addition to Ms. Solé and Mr. Jordan, the ISO respectfully requests that Ms. Le Vine be included in the Official Service List. Ms. Solé and Ms. Le Vine work in separate buildings, and it would be of significant assistance to the ISO if both were included on the list.

### III. BACKGROUND

On December 17, 2002, Pacific Gas and Electric Company ("PG&E") tendered for filing an annual update filing including revisions to its Reliability Must Run Agreements ("RMR Agreements") with the ISO for Helms Power Plant ("Helms") and San Joaquin Water Power Plant ("San Joaquin") ("PG&E Second Filing"). According to P&E, the filing revises portions of the Rate Schedules to adjust the values for Contract Service Limits, Owner's Repair Cost Obligation and Prepaid Start-up information. On December 26, 2002, the Commission issued a Notice of Filing setting January 7, 2003 as the comment date.

### IV. CONCLUSION

For the foregoing reasons, the ISO respectfully requests that the Commission permit it to intervene, and that it be accorded full party status in this proceeding.

Date: January 7, 2003

Respectfully submitted,

Counsel for the California Independent  
System Operator Corporation  
Jeanne M. Solé  
151 Blue Ravine Road  
Folsom, California 95630  
Phone: (916) 351-4400  
Fax: (916) 608-7222

By: */s/ Jeanne M. Solé*

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Jeanne M. Solé



January 7, 2003

Magalie Roman Salas, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Re: **Pacific Gas and Electric Company,  
Docket No. ER03-299-000**

Dear Secretary Salas:

Enclosed please find an electronic filing in the above-captioned proceeding of the Motion to Intervene of the California Independent System Operator Corporation. Thank you for your attention to this filing.

Respectfully submitted,

Jeanne M. Solé  
Counsel for the California Independent  
System Operator Corporation

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Folsom, CA, on this 7th day of January, 2003.

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Jeanne M. Solé