

Ravine Road, Folsom, CA 95630. The CAISO is the Control Area Operator responsible for the reliable operation of a grid comprising of 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:

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Please place each of the above persons on the official service list for this proceeding pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure. 18 C.F.R. § 385.2010 (2005).

III. Motion to Intervene

Humboldt Bay is located within PG&E's transmission system and is needed to maintain system reliability. As the Control Area Operator responsible for maintaining reliability of PG&E's transmission system and as the counter party to the RMR Agreement, the CAISO has a unique interest in any Commission

proceeding concerning proposed changes to the RMR Agreement. Accordingly, the CAISO has a direct and substantial interest in the proposed changes in this proceeding and requests that it be permitted to intervene with full rights of a party. 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. Comments

PG&E has revised its Rate Schedule to separate the previously combined unit data used for dispatching Humboldt Bay Mobile Units 2 and 3 in anticipation of the units being connected to the transmission grid through separate meters effective December 1, 2005. To date, Mobile Units 2 and 3 have been connected to the transmission grid through a single aggregated generation meter, and the CAISO has metered the units as a single unit. There are two steps PG&E must take to achieve separate metering of the units in question. PG&E must: (1) submit for CAISO approval updated Meter Service Agreement for ISO Metered Entities ("MSA/ISOME") and Participating Generator Agreement ("PGA") which reflects new Resource IDs for the individual meters, and (2) submit for CAISO approval a Resource Data Template ("RDT") which is used to update the CAISO's Master File with the Resource ID information. Accordingly, before CAISO can dispatch Mobile Units 2 and 3 individually, PG&E must complete these administrative steps to integrate the new meters with the CAISO's operations. PG&E needs to take action soon to achieve a December 1 effective date. Therefore, the CAISO requests that the Commission condition its acceptance of the revised

Rate Schedule on PG&E submitting for the CAISO's approval the updated MSA/ISOME, PGA and RDT.

V. Conclusion

For the foregoing reasons, the CAISO respectfully requests that the Commission grant the CAISO's motion to intervene in the above-captioned proceeding with full rights of a party and, in consideration of the CAISO's comments, condition the acceptance of the revised Rate Schedule as described above.

Respectfully submitted

/s/ Karin L. Larson

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Dated: November 3, 2005

CERTIFICATE OF SERVICE

I hereby certify that I have this 3rd day of November, 2005 caused to be served a copy of the forgoing Motion to Intervene and Comments upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

/s/Karin L. Larson
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