



December 7, 2005

VIA ELECTRONIC FILING

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

**Re: Geysers Power Company, LLC
Docket No. ER06-217-000**

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceedings is the Motion to Intervene and Limited 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

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 Pacific Gas and Electric Company ("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
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III. CAISO'S INTEREST AND MOTION TO INTERVENE

Geysers RMR Units are located within PG&E's transmission system and are needed to maintain the reliability of the ISO Controlled Grid. 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. STATEMENT OF ISSUES

1. The CAISO seeks to intervene in this proceeding with all rights attendant to such status.
2. The CAISO has not designated Geysers Units 13 and 16 as RMR Units for the 2006 Contract Year. Accordingly, Geysers is obligated to file a request for termination of the RMR Agreement pursuant to Paragraphs 2.2 (a) and 2.3. Geysers' November 16, 2005 filing should be rejected insofar as it attempts to revise the Geysers Units 13 and 16 RMR Agreement and the Commission should direct Geysers to file a notice and request for termination.

V. LIMITED PROTEST

Paragraph 2.2 of the RMR Agreement provides for termination of the RMR Agreement in the event the Agreement expires or terminates as to all Units subject to the Agreement. The CAISO has not designated either Geysers Units 13 or 16 as RMR Units for the 2006 Contract Year. This is evident in Geysers November 16 filing in the Schedule A to the Geysers Units 13 and 16 in Attachment A indicates that neither Unit is an RMR Unit for the 2006 Contract Year. Consequently, the Geysers Units 13 and 16 RMR Agreement will expire at the end of the 2005 Contract Year in accordance with the terms of the RMR Agreement.

Pursuant to Paragraph 2.3 of the RMR Agreement, whenever Commission authorization is required to give effect to expiration or termination of an RMR Agreement, the RMR Owner is obligated to file for the requisite

authorization to terminate the RMR Agreement as of the proposed effective date of the expiration or termination. Instead of filing such a request, Geysers filed updated rate schedules.¹ The CAISO requests that the Commission reject Geysers' November 16 filing insofar as it relates to the Geysers Units 13 and 16 RMR Agreement and direct Geysers to file a request for authorization to terminate the Geysers Units 13 and 16 RMR Agreement effective at midnight on December 31, 2005.

IV. 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-caption proceeding with full rights of participation and to reject Geysers November 16 filing insofar as it relates to the Geysers Units 13 and 16 RMR Agreement and direct Geysers to file the requisite request for authorization with the Commission.

Dated: December 7, 2005

Respectfully submitted

/s/ Sidney Mannheim Davies
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¹ The CAISO has no issues of concern with respect to the Geysers Main RMR Agreement.

CERTIFICATE OF SERVICE

I hereby certify that I have, this 7th day of December 2005, 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