

Way, Folsom, CA 95630. The ISO is the Balancing Authority 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 ISO requests that all communications and notices concerning this motion and these proceedings be provided to:

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III. ISO'S INTEREST

The Potrero generating units are interconnected to PG&E's transmission system. For many years, these facilities were needed to maintain the reliability of the ISO Controlled Grid. As the Balancing Authority Area Operator and as the counter party to the RMR agreements, the ISO has a unique interest in any Commission proceeding that affects an RMR Agreement. Accordingly, the ISO 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 ISO's interests in this proceeding, the ISO's intervention is in the public interest and should be granted.

IV. COMMENTS

As noted above, the Potrero RMR units played an important reliability role in maintaining the reliability of the San Francisco area for many years. Due to transmission and local area upgrades, the Potrero generating units are no longer needed for reliability must-run service.

On January 19, 2011, the Commission issued a delegated order effective as of January 1, 2011 in Docket No. ER11-2216 that accepted revisions to Potrero's RMR agreement, including the provision that allows the ISO to terminate the RMR agreement upon notice prior to the end of a contract year. On December 21, 2010, the ISO provided Potrero with notice of termination effective as of January 1, 2011. As a result of the notice of termination, the RMR agreement will terminate as of midnight, February 28, 2011. Consequently, on January 25, 2011, Potrero filed its notice of cancellation requesting a February 28, 2011 effective date and waiver of the Commission's prior notice requirements.

The ISO urges the Commission accept Potrero's filing effective as of February 28, 2011. Such an order would align with the termination date and allow for timely wind-up of the RMR agreement.

V. CONCLUSION

For the foregoing reasons, the ISO respectfully requests that the Commission grant this motion to intervene and make the ISO a party in the above-captioned proceeding with full rights of participation. More specifically, the ISO requests that the Commission accept Potrero's notice of cancellation of the of its RMR agreement effective as of February 28, 2011 as requested by Potrero.

Dated: February 15, 2011

Respectfully submitted

By: /s/ Sidney Mannheim Davies

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CERTIFICATE OF SERVICE

I hereby certify that I have, this 15th day of February, 2011, 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.

Is/ Anna Pascuzzo

Anna Pascuzzo