UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Pacific Gas and Electric Company)	Docket No. ER00-3150-000
)	

MOTION TO INTERVENE OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. § 385.214, and the Commission's July 18, 2000, Notice of Filing, the California Independent System Operator Corporation ("ISO") hereby moves to intervene in the above-captioned proceeding. In support thereof, the ISO states as follows:

I. COMMUNICATIONS

Please address communications concerning this filing to the following persons:

Roger E. Smith, Senior Regulatory Counsel
Deborah Le Vine, Director of
Contracts and Compliance
The California Independent System
Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630

Tel: (916) 351-4400 Fax: (916) 351-4436 Edward Berlin Kenneth G. Jaffe Michael E. Ward Swidler Berlin Shereff Friedman, LLP 3000 K Street, NW, Suite 300 Washington, DC 20007

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II. BASIS FOR MOTION TO INTERVENE

On July 13, 2000, Pacific Gas and Electric Company ("PG&E") tendered for filing with the Commission an Emergency Service Agreement Between Pacific Gas & Electric Company and Northern California Power Agency

("NCPA"). PG&E states that the agreement is intended to facilitate NCPA's supplying of excess and reserve energy to the ISO to support the reliability of the electric grid in California. Under the Agreement, when the ISO requests dispatch of excess energy from NCPA and pays PG&E (as NCPA's Scheduling Coordinator) therefor, PG&E will transfer the payments to NCPA.

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 PG&E, San Diego Gas & Electric Company, and Southern California Edison Company, as well as for the coordination of the competitive electricity market in California. The agreement will affect the procedures by which the ISO maintains the reliability of the grid. The ISO therefore has an interest in the proceeding that cannot adequately be represented by any other party.

The ISO is committed to, and responsible for, maintaining fair and nondiscriminatory access to the electric grid in California. Therefore, the ISO's participation in the proceeding is also in the public interest.

Accordingly, the ISO requests that it be permitted to intervene herein with full rights of a party.

III. CONCLUSION

Wherefore, 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.

Respectfully submitted,

Charles Robinson, General Counsel Roger E. Smith, Senior Regulatory Counsel California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 Edward Berlin Kenneth G. Jaffe Michael E. Ward Swidler Berlin Shereff Friedman, LLP 3000 K Street, NW, Suite 300 Washington, DC 20007

Tel: (202) 424-7500 Fax: (202) 424-7643

Counsel for the California Independent System Operator Corporation

Date: August 3, 2000

CERTIFICATE OF SERVICE

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

Dated at Washington, DC, on this 3rd day of August, 2000.

Michael E. Ward

August 3, 2000

The Honorable David P. Boergers Secretary Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

Re: Pacific Gas and Electric Company,
Docket No. ER00-3150-000

Dear Secretary Boergers:

Enclosed for filing are one original and 14 copies of the Motion to Intervene of the California Independent System Operator Corporation in the above-identified proceeding. Two additional copies of the filing are also enclosed. Please stamp the two additional copies with the date and time filed and return them to the messenger.

Thank you for your assistance in this matter.

Yours truly,

Michael E. Ward Swidler Berlin Shereff Friedman, LLP 3000 K Street, NW, Suite 300 Washington, DC 20007

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Counsel for the California Independent System Operator Corporation