



January 13, 2006

**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. ER06-387-000**  
**Docket No. ER06-217-000 (*not consolidated*)**

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceeding is the Motion to Intervene, Comments and Withdrawal of 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

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

<b>Geysers Power Company, LLC</b>	)	<b>Docket No. ER06-387-000</b>
	)	<b>Docket No. ER06-217-000</b>
	)	<b><i>(not consolidated)</i></b>
	)	

**MOTION TO INTERVENE, COMMENTS AND WITHDRAWAL OF LIMITED  
PROTEST 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 December 30, 2005, Notice of Filing, the California Independent System Operator Corporation (“CAISO”) submits this Motion to Intervene, comment and withdrawal of limited protest in the above captioned proceeding. In support thereof, the CAISO states as follows:

**I. DESCRIPTION OF THE PROCEEDING**

On December 23, 2005, Geysers Power Company, LLC (“Geysers”) submitted a Notice of Termination of its First Revised Rate Schedule FERC No. 4 (“Notice of Termination”), the Reliability Must-Run Service Agreement (“RMR Agreement”) with CAISO for Geysers Units 13 and 16, effective 01/01/2006. The Commission established Docket No. ER06-387 for this filing. By its Notice issued December 30, 2005, the Commission established January 13, 2006, as the date motions to intervene are to be filed in the above-captioned proceeding. This filing relates to Geysers’ prior filing in Docket No. ER06-217, in which the CAISO filed a limited protest arguing that, Geysers had an obligation under the

RMR Agreement to terminate the RMR Agreement with respect to Geysers Units 13 and 16.

## **II. DESCRIPTION OF THE CAISO AND COMMUNICATIONS**

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California with its principal place of business at 151 Blue 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 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  
Assistant General Counsel  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 608-7144  
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## **III. CAISO'S INTEREST**

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 the rights attendant to such status.
2. Geysers Notice of Termination filed in ER06-387 resolves the limited protest filed by the CAISO in ER06-217. Accordingly, the CAISO withdraws its limited protest in ER06-217.

#### **V. COMMENT AND WITHDRAWAL OF PROTEST**

In Docket No. ER06-217, the CAISO filed a limited protest arguing that Geysers was under an obligation to terminate the RMR Agreement with respect to Geysers Units 13 and 16 because the CAISO had not designated these units as RMR Units for the 2006 Contract Year. By filing a Notice of Termination as to Geysers Units 13 and 16 in ER06-387, Geysers has complied with the requirements of the RMR Agreement and has addressed the CAISO's concerns in ER06-217. Accordingly, the CAISO hereby withdraws its limited protest in that docket.

**VI. CONCLUSION**

For the foregoing reasons, the CAISO respectfully requests that the Commission grant this Motion to Intervene in ER06-387 and accept the CAISO's request to withdraw the limited protest filed in ER06-217.

Dated: January 13, 2006

Respectfully submitted

**/s/ Sidney Mannheim Davies**  
Sidney Mannheim Davies  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this 13<sup>th</sup> day of January 2006 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