

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

Pacific Gas and Electric Company)
)
) **Docket No. ER00-2599-000**

**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 May 31, 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:

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II. BACKGROUND

On May 25, 2000, Pacific Gas and Electric Company (“PG&E”) tendered for filing three agreements: an Interconnection Agreement (“IA”) between PG&E and Lassen Municipal Utility District (“Lassen”); an Islanding Agreement between Lassen, HL Power Company, and PG&E; and a Letter Agreement between Lassen and PG&E dated May 12, 2000, regarding Interconnection Capacity and Study Procedures. PG&E and Lassen entered into the IA to provide for the continued interconnection of their electric systems. The IA provides the terms and conditions for such interconnection. The Islanding Agreement provides the terms and conditions to facilitate Lassen’s separation from PG&E’s transmission system at the Lassen-PG&E interconnection point and the HL Power Plant’s sole provision of Lassen’s electric energy and capacity requirements during periods of outages of the interconnection point. The Letter Agreement waives certain study requirements in the IA during times when there is unused capacity on the interconnecting transmission line.

III. BASIS FOR MOTION TO INTERVENE

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. As the operator of the PG&E transmission system, the ISO believes that it has a unique interest in any Commission proceeding concerning the agreements submitted. Moreover,

PG&E states that the IA requires Lassen to enter into certain agreements with the ISO, including a Utility Distribution Company Operating Agreement and a Metered Service Agreement for ISO Metered Entities, prior to the effective date of the IA. The IA also provides that Lassen will have power delivered to it at the point of interconnection listed in Appendix A of the IA using transmission service provided under the currently effective ISO Tariff or other agreements. PG&E Transmittal Letter at 2. Accordingly, the ISO requests that it be permitted to intervene herein with full rights as a party.

The ISO raises no substantive issues at the present time but reserves the right to do so in any further aspects of the proceeding ordered by the Commission. The ISO also reserves the right to file supplemental comments if warranted.

IV. 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,

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Counsel for the California Independent
System Operator Corporation

Date: June 15, 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 15th day of June, 2000.

David Rubin

June 15, 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. ER00-2599-000**

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.

Respectfully submitted,

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