

December 6, 2000

David P. Boergers, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Re: **Pacific Gas and Electric Company,  
Docket No. ER01-460-000**

Dear Secretary Boergers:

Enclosed for filing in the above-captioned proceeding are an original and fourteen copies of the Motion to Intervene of the California Independent System Operator Corporation. Two additional copies of the filing are also enclosed. I would appreciate your stamping the additional copies with the date filed and returning it to the messenger.

Respectfully submitted,

Rebecca A. Blackmer  
Counsel for the California Independent System  
Operator Corporation

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

**Pacific Gas and Electric Company    )     Docket No. ER01-460-000  
  )**

**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 November 21, 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) 608-7135  
Fax: (916) 608-7296

J. Phillip Jordan  
Rebecca A. Blackmer  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007  
Tel: (202) 424-7500  
Fax: (202) 424-7643

## **II. BACKGROUND**

On November 15, 2000, Pacific Gas and Electric Company (“PG&E”) tendered for filing, pursuant to Section 205 of the Federal Power Act, a revised copy of its Must-Run Service Agreements (“RMR Agreements”), which governs the rates, terms, and conditions of service provided to the ISO by PG&E. The purpose of this filing is to update the Contract Service Limits for the year beginning January 1, 2001; to conform the terms and conditions of these RMR Agreements to the amendments approved by the Commission’s letter order of October 26, 2000, 93 FERC ¶ 61,089; and to comply with Order No. 614, 90 FERC ¶ 61,352 (2000), concerning the designation of rate schedule sheets.

## **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 this grid, the ISO believes that it has a unique interest in any Commission proceeding concerning Must-Run service provided to the ISO.

Upon review of the changes proposed by PG&E to its Must-Run Rate Schedule, the ISO discovered several errors with respect to the calculations provided and reported these errors to PG&E. PG&E acknowledged these errors, and provided the ISO with updated figures that the ISO found acceptable. We believe the correct values are: (1) Table B-1, Condition 2 Hourly Availability

Charge, Hunters Point 4 should be: \$4263.65; (2) Table B-3, Condition 2 Hourly Availability Charge, Hunters Point 4 should be: \$4263.65; (3) Table B-5, Long Term Planned Outage Hours, Hunters Point 4 should be: 2016; and (4) Table B-5, Target Available Hours, Hunters Point 4 should be: 4892.

It is the ISO's understanding that PG&E plans to file an amendment and errata to its revised RMR Agreements with the appropriate figures. Assuming that PG&E does so, the ISO has no substantive issues that it wishes to raise at the present time but reserves the right to do so should PG&E fail to submit the corrected calculations. The ISO also reserves the right to file supplemental comments if warranted.

#### **IV. CONCLUSION**

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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J. Phillip Jordan  
Rebecca A. Blackmer  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007  
Tel: (202) 424-7500  
Fax: (202) 424-7643

Counsel for the California Independent  
System Operator Corporation

Date: December 6, 2000

## **CERTIFICATE OF SERVICE**

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

Dated at Washington, DC, on this 6<sup>th</sup> day of December, 2000.

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Rebecca A. Blackmer  
Swidler Berlin Shereff Friedman  
3000 K Street, NW, Suite 300  
Washington, DC 20007  
Tel: (202) 424-7500  
Fax: (202) 424-7643