

December 22, 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. ER01-460-001

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,

Sean A. Atkins
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. ER01-460-001
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**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 December 7, 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
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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, revised copies of its Must-Run Service Agreements (“RMR Agreements”), which govern the rates, terms, and conditions of service provided to the ISO by PG&E. The purpose of that filing was 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. After that filing was made, the ISO discovered that PG&E had made several errors in calculations relating to Unit 4 of the Hunters Point Power Plant. PG&E acknowledged these errors, and submitted the filing at issue in order to remedy them. Accordingly, PG&E proposes to amend the data submitted in the initial filing for the following categories in Schedule B, Tables B-1 through B-5 of the Hunters Point Must-Run Agreement: Long-Term Planned Outage Hours, Hourly Availability Charge, Target Available Hours, and Hourly Penalty Rate. PG&E also proposes to correct several typographical errors discovered in the initial filing.

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 in order to support the reliability of this grid. This interest cannot adequately be represented by any other party. Moreover, the ISO is responsible for ensuring nondiscriminatory access to this grid, which may be affected by the terms of any RMR Agreement. The ISO's participation in this proceeding is therefore in the public interest.

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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Counsel for the California Independent
System Operator Corporation

Date: December 22, 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 22nd day of December, 2000.

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