UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Electric Generation LLC) Docket No. ER02-456-000

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 December 13, 2001, 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:

William Hayes*
Deborah A. Le Vine
California Independent System
Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630

David Rubin*
Swidler Berlin Shereff Friedman,
LLP
3000 K Street, NW, Suite 300
Washington, DC 20007

^{*} Individuals designated for service pursuant to Rule 203(b)(3), 18 C.F.R. § 385.203(b)(3).

¹ In addition to Mr. Hayes and Mr. Rubin, the ISO respectfully requests that Ms. Le Vine be included on the Official Service List. Mr. Hayes and Ms. Le Vine work in separate buildings, and it would be of significant assistance to the ISO if both were included on the list.

II. BACKGROUND

On November 30, 2001, as described in the Notice of Filing, Electric Generation LLC ("Electric Generation") filed a Power Purchase and Sale Agreement ("PSA") between Electric Generation and Pacific Gas and Electric Company ("PG&E"). The PSA is part of the plan of reorganization filed by PG&E with the Bankruptcy Court on September 20, 2001. It provides the Reorganized PG&E with the right to dispatch and receive all energy, capacity and Ancillary Services from an approximately 7,100 MW portfolio of resources currently owned or contracted for by PG&E. The PGA is expected to go into effect on January 1, 2003 and last for twelve years.

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 the PG&E agreements described above.

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,

David B. Rubin 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: January 30, 2002

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, D.C. this 30th day of January, 2002.

David B. Rubin Swidler Berlin Shereff Friedman, LLP 3000 K Street, NW, Suite 300 Washington, D.C. 20007

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

January 30, 2002

The Honorable Magalie Roman Salas Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426

Re: Electric Generation LLC Docket No. ER02-456-000

Dear Secretary Salas:

Enclosed for filing in the above-captioned proceeding are the 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,

David B. Rubin
Counsel for the California Independent
System Operator Corporation