

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

Geysers Power Company, LLC) Docket No. ER03-184-000

**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 19, 2002 Notice of Filing, the California Independent System Operator Corporation (“ISO”) hereby moves to intervene in the above-captioned proceeding¹. In support thereof, the ISO states as follows:

I. COMMUNICATIONS

Please address communications concerning this filing to the following persons:

¹ The ISO is filing its protest in this matter in a separate document.

<p>Jeanne M. Solé* Regulatory Counsel The California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 Tel: (916) 351-4400 Fax: (916) 608-7222</p>	<p>J. Phillip Jordan* Rebecca A. Blackmer Swidler Berlin Shereff Friedman, LLP 3000 K Street, N.W., Suite 300 Washington, DC 20007 Tel: (202) 424-7500 Fax: (202) 424-7643</p>
<p>Deborah A. Le Vine² Director of Contracts The California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 Tel: (916) 351-4400 Fax: (916) 608-7222</p>	

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

II. BACKGROUND

On November 13, 2002, Geysers Power Company, LLC ("Geysers Power") tendered for filing pursuant to Section 205 of the Federal Power Act ("FPA") revised rate schedule sheets for the Reliability Must-Run ("RMR") Service Agreement between Geysers Power and the ISO for the Geysers Main Units ("Geysers Main RMR Agreement"), and for the RMR Service Agreement between Geysers Power and the ISO for the Geysers Units 13 and 16 ("Geysers Units 13 and 16 RMR Agreement"). The filing ("Geysers Power Filing") is intended to undertake annual updates in accordance with the RMR Agreements and to comply with the provisions of an Offer of Settlement between Geysers Power, the ISO and Pacific Gas and Electric Company ("PG&E") submitted on

November 13, 2002, in Docket Nos. ER02-188-000, ER02-236-000, ER02-236-001, ER02-407-000 and ER02-407-001. The Geysers Power Filing includes revisions to Schedule A (description of facilities and contract service limits), Schedule B (the values in Tables B-1 through B-6), Schedule C (Steam Price and Equation C2-2), Schedule D (Start-Up Payment), and the "Notice" information reflected in Schedule J.

On November 19, 2002, the Commission issued a "Notice of Filing" setting December 5, 2002, as the final date for interventions and protests.

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 a number of public utilities including Pacific Gas and Electric Company ("PG&E"), as well as for the coordination of the competitive Ancillary Services and real-time electricity markets in California. The Geysers Main Units and Geysers Units 13 and 16 are located within PG&E's transmission system and are needed to maintain local area reliability. As the Control Area Operator responsible for maintaining the reliability of the PG&E's transmission system, and as the counter party in the RMR Agreements governing Geysers Power's provision of RMR services, the ISO has a unique interest in any Commission proceeding concerning proposed changes to those RMR Agreements. Accordingly, the ISO has a direct and substantial interest in

² In addition to Ms. Solé and Mr. Jordan, the ISO respectfully requests that Ms. Le Vine be included in the Official Service List. Ms. Solé 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.

the proposed rate changes and requests that it be permitted to intervene in this proceeding with full rights of a party.

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,

Jeanne M. Solé
Regulatory Counsel
California Independent System Operator
Corporation
151 Blue Ravine Road
Folsom, CA 95630
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Counsel for the California Independent
System Operator Corporation

Date: December 5, 2002



December 5, 2002

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

Re: **Geysers Power Company, LLC**
Docket No. ER03-184-000

Dear Secretary Salas:

Enclosed please find an electronic filing in the above-captioned proceeding of the Motion to Intervene of the California Independent System Operator Corporation. Thank you for your attention to this filing.

Respectfully submitted,

Jeanne M. Solé
Counsel for the California Independent
System Operator Corporation

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 Folsom, CA, on this 5th day of December, 2002.

Jeanne M. Solé