

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

Pacific Gas and Electric)
Company) **Docket No. ER03-358-000**

**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 January 3, 2003 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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Senior Regulatory Counsel
Deborah A. LeVine, Director of
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II. BACKGROUND

On December 31, 2002, Pacific Gas and Electric Company (PG&E) tendered for filing Generator Special Facilities Agreements (GSFAs), Generator Interconnection Agreements (GIAs) and Letter Agreements Supplementing, Clarifying, and Modifying the Generator Special Facilities Agreement (Supplemental Letter Agreements) between PG&E and the following Calpine-owned parties: Gilroy Energy Center, LLC (Gilroy); Los Esteros Critical Energy Facility, LLC (Los Esteros); Yuba City Energy Center, LLC (Yuba City); Metcalf Energy Center, LLC (Metcalf); Lambie Energy Center, LLC (Lambie); Goose Haven Energy Center, LLC (Goose Haven); Creed Energy Center, LLC (Creed); King City Energy Center, LLC (King City); Feather River Energy Center, LLC (Feather River); Riverview Energy Center, LLC (Riverview); Wolfskill Energy Center, LLC (Wolfskill); and Delta Energy Center, LLC (DEC).

By its Notice issued January 3, 2003, the Commission established January 21, 2003 as the date motions to intervene are to be filed in the above-captioned proceeding.

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 Pacific Gas & Electric Company, Southern California Edison Company, San Diego Gas & Electric Company and the Cities of Vernon, Anaheim, Azusa, Banning and Riverside, California. As the

operator of this grid, the ISO believes that it has a unique interest in any Commission proceeding concerning the issues raised in the captioned proceeding.

IV. CONCLUSION

For the foregoing reasons, the ISO respectfully requests that the Commission permit it to intervene, and that the ISO be accorded full party status in this proceeding.

Respectfully submitted,

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California Independent System
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Counsel for the California Independent
System Operator Corporation

Date: January 21, 2003

CERTIFICATE OF SERVICE

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

Dated at Folsom, CA, this 21st day of January, 2003.

Anthony J. Ivancovich



January 21, 2003

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

Re: **Pacific Gas and Electric Company**
Docket No. ER03-358-000

Dear Secretary Salas:

Enclosed please find a copy of the Motion to Intervene of the California Independent System Operator Corporation in the above noted matter. Thank you for your attention to this filing.

Respectfully submitted,

Anthony J. Ivancovich

Counsel for the California Independent
System Operator Corporation