

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

Pacific Gas and Electric Company)))	Docket No. ER04-1139-000
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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 August 23, 2004, 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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Operator Corporation
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II. BACKGROUND

On August 19, 2004, Pacific Gas and Electric Company (PG&E) tendered for filing an amendment to the Interconnection Agreement (IA) between PG&E and the Port of Oakland (Port) to include the Davis Substation at Transmission Voltage a Point of Interconnection. PG&E states that the IA is submitted pursuant to the PG&E Wholesale Distribution Tariff (WDT). PG&E requests an effective date of January 5, 2005.

By its Notice issued August 23, 2004, the Commission established September 9, 2004, 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,

/s Anthony J. Ivancovich

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Counsel for the California Independent
System Operator Corporation

Date: September 9, 2004

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 9th day of September 2004.

/s Anthony J. Ivancovich
Anthony J. Ivancovich



September 9, 2004

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. ER04-1139-000

Dear Secretary Salas:

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

Respectfully submitted,

/s Anthony J. Ivancovich
Anthony J. Ivancovich

Counsel for the California Independent
System Operator Corporation