

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

**Pacific Gas and Electric Company) Docket Nos. EL00-95-024
) and EL00-98-023**

**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 April 9, 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:

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II. BACKGROUND

On April 2, 2001, Pacific Gas and Electric Company (“PG&E”) tendered for filing, pursuant to Section 205 of the Federal Power Act, proposed amendments to its Transmission Owner (“TO”) Tariff¹ that address the obligations of generating facilities seeking interconnection to PG&E’s transmission grid. The filing was made in compliance with the Commission’s December 15, 2000 Order (“December 15 Order”).² That order directed the California Independent System Operator (“ISO”) to file proposed interconnection procedures (“IPs”) to facilitate the interconnection of new generators or existing generators seeking to increase the capacity of their facilities. It also directed California Investor-Owned Utilities (“IOUs”) to file compatible IPs.

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 and Electric Company, 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 proposing to implement procedures affecting interconnection to the ISO Controlled Grid and therefore the ISO’s ability to manage the grid reliably and efficiently.

¹ Capitalized terms not otherwise defined herein are defined in the Master Definitions Supplement, ISO Tariff Appendix A, as filed August 15, 1997, and subsequently revised.

² *Order Directing Remedies for California Wholesale Electric Markets*, 93 FERC ¶ 61,294 (2000).

In its December 15 Order, the Commission pointed out that it was essential to require the IOUs to file IPs compatible to those developed by the ISO in order to avoid confusion regarding the ISO's ability to require the IOUs to make interconnections deemed necessary for the stability of the grid. The Commission also pointed out that having such IOU IPs in place would serve to avoid delay in installing interconnections for new or expanded generation capacity. As such, the ISO has a direct and substantial interest in the proposed IPs since they will affect the ISO's ability to facilitate needed interconnections. In light of the close relationship between PG&E's filing and the ISO's proposed interconnection procedures, the ISO reserves the right to file additional comments on PG&E's filing should they be necessary in order to ensure compatibility with the ISO's filing.

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
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Date: April 23, 2001

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 23rd day of April, 2001.

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April 23, 2001

David P. Boergers, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: **Pacific Gas and Electric Company,
Docket Nos. EL00-95-024 and EL00-98-023**

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,

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