



November 12, 2004

VIA ELECTRONIC FILING

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

**Re: Pacific Gas and Electric Company
Docket Nos. ER05-113-000 and ER05-125-000**

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceedings is the Motion to Intervene and Consolidate of the California Independent System Operator Corporation and Request for 45-Day Comment Period.

Thank you for your attention to this matter.

Yours truly,

/s/ Sidney L. Mannheim
Sidney L. Mannheim
Regulatory Counsel

Counsel for the California Independent
System Operator Corporation

Enclosure

cc: Service List

describing proposed changes to its Annual Fixed Revenue Requirements under its RMR Agreements as provided by Part B of Article I of Schedule F of the pro-forma RMR Contract. This filing is docketed as ER05-125-000. Both filings relate to proposed changes to the RMR Agreements for the 2005 Contract Year.

II. DESCRIPTION OF THE ISO AND COMMUNICATIONS

The ISO is a non-profit public benefit corporation organized under the laws of the State of California with a principal place of business at 151 Blue Ravine Road, Folsom, CA 95630. The ISO is the Control Area operator responsible for the reliable operation of the electric grid comprising the transmission systems of a number of utilities including PG&E, as well as the coordination of the ancillary services and real-time electricity markets in California.

The ISO requests that all communications and notices concerning this motion and these proceedings be provided to:

Sidney L. Mannheim
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California Independent System
Operator Corporation
151 Blue Ravine Road
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916-608-7144 (tel)
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III. MOTION TO INTERVENE

PG&E's RMR Units are needed to maintain the reliability of the ISO-Controlled Grid. As the Control Area operator and as the counter party to the RMR Agreements, the ISO has a unique interest in any Commission proceeding

that affects an RMR Contract. Accordingly, the ISO has a direct and substantial interest in this proceeding and requests that it be permitted to intervene.

Because no other party can adequately represent the ISO's interests in this proceeding, the ISO's intervention is in the public interest and should be granted.

IV. MOTION TO CONSOLIDATE

As noted above, PG&E's filings in both dockets consist of proposed changes and revisions to the rate schedules of the RMR Agreements between PG&E and the ISO for the 2005 Contract Year. It will be more efficient for the Commission and the parties to address all proposed changes affecting the rate schedules for the 2005 Contract Year in a single consolidated docket.

V. REQUEST FOR 45-DAY COMMENT PERIOD

The Notices of Filing specify a comment date of November 19, 2004, twenty-one days from the date of the filings, the Commission's standard comment period. Schedule F of the RMR Agreements, however, provides interested parties with 45 days to protest informational filings submitted pursuant to Part B of Article I of Schedule F. Accordingly, the ISO requests that the Commission establish a 45-day comment period requiring comments and protests to be filed on or before December 13, 2004.

VI. CONCLUSION

For the foregoing reasons, the ISO respectfully requests that the Commission grant this Motion to Intervene and make the ISO a party in the above-caption proceeding with full rights of participation. The ISO also respectfully requests that the Commission consolidate the above-referenced dockets in the interest of administrative efficiency and establish December 13, 2004 as the comment date.

Dated: November 12, 2004

Respectfully submitted

Sidney L. Mannheim
Sidney L. Mannheim
California Independent System
Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630

CERTIFICATE OF SERVICE

I hereby certify that I have this 12th day of November, 2004 caused to be served a copy of the forgoing Motion to Intervene and Protest upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

/s/ Sidney L. Mannheim

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