

LAWYERS

Davis Wright Tremaine LLP

ANCHORAGE BELLEVUE LOS ANGELES NEW YORK PORTLAND SAN FRANCISCO SEATTLE SHANGHAI WASHINGTON, D.C.

STEVEN F. GREENWALD
DIRECT (415) 276-6528
stevegreenwald@dwt.com

SUITE 800
505 MONTGOMERY STREET
SAN FRANCISCO, CA 94111-6533

TEL (415) 276-6500
FAX (415) 276-6599
www.dwt.com

November 13, 2008

Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Joint Motion to Dismiss Docket Nos. ER08-1289-000, ER08-1290-000,
ER08-1291-000, ER08-1292-000

Dear Secretary Bose:

Pursuant to Rules 212 and 216 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission, Geysers Power Company, LLC, Pacific Gas and Electric Company, and the California Independent System Operator Corporation, hereby submit for filing a Joint Motion to Dismiss Docket Nos. ER08-1289-000, ER08-1290-000, ER08-1291-000, ER08-1292-000.

/s/ Steven F. Greenwald

Steven F. Greenwald
Davis Wright Tremaine LLP
Counsel for Geysers Power Company, LLC

cc via email: Chief Administrative Law Judge Curtis L. Wagner, Jr.
Administrative Law Judge Edward M. Silverstein
Kurt Seel, Geysers Power Company, LLC
Alice L. Reid, Pacific Gas and Electric Company
Bill DiCapo, California Independent System Operator Corporation

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

California Independent System)	Docket Nos.	ER08-1289-000
Operator Corporation)		ER08-1290-000
)		ER08-1291-000
)		ER08-1292-000

JOINT MOTION TO DISMISS

Pursuant to Rules 212 and 216 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or the “Commission”), Geysers Power Company, LLC, Pacific Gas and Electric Company, and the California Independent System Operator Corporation (collectively “the Parties”), who are all parties to the proceedings, hereby jointly move to dismiss the proceedings in above-captioned dockets. By Order issued August 28, 2008, the Commission established settlement judge procedures and consolidated the above-captioned proceedings to facilitate settlement discussions. The Parties have reached unanimous agreement on the terms of the Large Generator Interconnection Agreements for the subject Aidlin, Bear Canyon, Calistoga, and West Ford Flat power plants, and all agree that no further Commission proceedings in the referenced dockets are required.

WHEREFORE, Geysers Power Company, LLC, Pacific Gas and Electric Company, and the California Independent System Operator Corporation hereby jointly move to dismiss the proceedings in the above-captioned dockets.

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

/s/ Steven F. Greenwald

Steven F. Greenwald
Lisa Zycherman
505 Montgomery Street
Suite 800
San Francisco, California 94111-6533

Tel.: (415) 276-6528
Fax: (415) 276-6599
Email: stevegreenwald@dwt.com

Attorneys for Geysers Power Company, LLC

/s/ Alice L. Reid

Charles R. Middlekauff
Alice L. Reid
Pacific Gas and Electric Company
P.O. Box 7442
San Francisco, CA 94120
Tel.: (415) 973-2966
Fax: (415) 973-5520
Email: alr4@pge.com

Attorneys for Pacific Gas and Electric Company

/s/ Baldassaro "Bill" Di Capo

Nancy Saracino, General Counsel
Sidney M. Davies, Assistant General Counsel
Baldassaro "Bill" Di Capo, Counsel
California Independent System Operator
Corporation
151 Blue Ravine Road
Folsom, CA 95630
Tel.: (916) 608-7157
Fax: (916) 608-7222
Email: bdicapo@caiso.com

*Attorneys for the California Independent System
Operator Corporation*

Dated: November 13, 2008

CERTIFICATE OF SERVICE

I hereby certify that I have on November 13, 2008, served a copy of this document upon each person designated on the official service list compiled by the Secretary in this proceeding.

/s/ Steven F. Greenwald

Steven F. Greenwald
Davis Wright Tremaine LLP
505 Montgomery Street
Suite 800
San Francisco, California 94111-6533
Tel.: (415) 276-6528

Document Content(s)

Motion to Dismiss CAISO 111308.PDF.....1-4