

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

Los Medanos Energy Center, LLC

)

Docket No. ER08-133-000

**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 (2007), the California Independent System Operator Corporation (“CAISO”) submits this Motion to Intervene in the captioned proceeding. In support thereof, the CAISO states as follows:

I. Description of the Proceeding

On October 31, 2007, Los Medanos Energy Center, LLC (“Los Medanos”) submitted, pursuant to Section 205 of the Federal Power Act (“FPA”), revisions to certain of the rate schedule sheets to its Reliability Must-Run Service Agreement (“RMR Agreement”) with the CAISO for the Los Medanos Energy Center (the “Facility”) for Contract Year 2008. Los Medanos requests a January 1, 2008 effective date for the revised sheets.

The Commission issued a Combined Notice of Filings, setting November 21, 2007 as the comment date for interventions and protests in this proceeding.

II. Description of the CAISO and Communications

The CAISO 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 CAISO is the Control Area Operator responsible for the reliable operation of a grid comprising of the transmission systems of a number of public utilities including Pacific Gas and

Electric Company (“PG&E”), as well as the coordination of the ancillary services and real-time electricity markets in California.

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

Sidney Mannheim Davies
Assistant General Counsel
California Independent System
Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
916-608-7144 (tel)
916-608-7222 (fax)
sdavies@caiso.com

Robert C. Kott
Manager of Model & Contract Implementation
California Independent System
Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
916-608-5804 (tel)
916-351-2487 (fax)
rkott@caiso.com

Mary Anne Sullivan
Hogan & Hartson L.L.P.
555 Thirteenth Street, N.W.
Washington, D.C. 20004
202-637-3695 (tel)
202-637-5910 (fax)
masullivan@hhlaw.com

Karin L. Larson
Hogan & Hartson L.L.P.
555 Thirteenth Street, N.W.
Washington, D.C. 20004
202-637-6861 (tel)
202-637-5910 (fax)
kllarson@hhlaw.com

III. Motion to Intervene

Los Medanos’ Facility is located within PG&E’s transmission system and is needed to maintain the reliability of such system. As the Control Area Operator responsible for maintaining reliability of the PG&E transmission system and as the counter party to Los Medanos’ RMR Agreement, the CAISO has a unique interest in any Commission proceeding that affects this RMR Agreement. Accordingly, the CAISO has a direct and substantial interest in the proposed changes in this proceeding and requests that it be permitted to intervene with full rights of a party. Because no other party can adequately represent the CAISO’s interests in this proceeding, the CAISO’s intervention is in the public interest and should be granted.

IV. Conclusion

For the foregoing reasons, the CAISO respectfully requests that the Commission grant the CAISO's motion to intervene and make the CAISO a party in the above-captioned proceeding with full rights of participation.

Respectfully submitted,

/s/ Mary Anne Sullivan
Mary Anne Sullivan
Karin L. Larson
Hogan & Hartson L.L.P.
555 13th Street, N.W.
Washington, D.C. 20004

Counsel for
California Independent System
Operator Corporation

Dated: November 21, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this 21st day of November, 2007 caused to be served a copy of the forgoing Motion to Intervene upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

/s/ Karin L. Larson
Karin L. Larson
Hogan & Hartson L.L.P.
555 13th Street, N.W.
Washington, D.C. 20004