



California Independent
System Operator Corporation

November 27, 2006

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
Helms Power Plant
Docket No. ER07-149-000**

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceedings is the Motion to Intervene Out of Time of the California Independent System Operator Corporation.

Thank you for your attention to this matter.

Yours truly,

/s/ Sidney Mannheim Davies

Sidney Mannheim Davies
Assistant General Counsel
Counsel for the California Independent
System Operator Corporation

Enclosure
cc: Service List

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

**Pacific Gas and Electric
Company**

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Docket No. ER07-149-000

**MOTION TO INTERVENE OUT OF TIME 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 November 7, 2006, Combined Notice of Filings, the California Independent System Operator Corporation (“CAISO”) submits this Motion to Intervene Out of Time in the above captioned proceeding. In support thereof, the CAISO states as follows:

I. DESCRIPTION OF THE PROCEEDING

On November 2, 2006, Pacific Gas and Electric Company (PG&E) tendered for filing its Notice of Cancellation of its FERC Rate Schedule 207 of the Reliability Must Run (“RMR”) Service Agreement between PG&E and CAISO for Helms Power Plant (PG&E First Revised Rate Schedule FERC No. 207). PG&E requests the Notice of Cancellation to become effective January 1, 2007, consistent with the termination date of the underlying contract.

By its Notice issued November 7, 2006, the Commission established November 22, 2006, as the date motions to intervene are to be filed in the above-captioned 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 its 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 the electric grid comprising the transmission systems of a number of utilities including Pacific Gas & 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:

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III. CAISO’S INTEREST

Helms Power Plant is located within PG&E’s transmission system and has been 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 CAISO has a unique interest in any Commission proceeding that affects an RMR Agreement. Accordingly, the CAISO 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 CAISO's interests in this proceeding, the CAISO's intervention is in the public interest and should be granted.

Based on the fact that PG&E has procured adequate Local Area Resource Adequacy Resources, the CAISO has determined that it no longer needs this resource to provide reliability services under the RMR Agreement. Accordingly, the CAISO notified PG&E that it would not be extending the term of the RMR Agreement and requested PG&E to file a Notice of Cancellation, to which the CAISO does not object.

IV. MOTION TO INTERVENE OUT OF TIME

Due to an administrative oversight, the CAISO failed to file this motion by the date specified in the November 7, 2006, Combined Notice of Filings. Given the early status of the proceeding, however, no party will be prejudiced by the granting of the motion.

V. CONCLUSION

For the foregoing reasons, the CAISO respectfully requests that the Commission grant this Motion to Intervene and make the CAISO a party in the above-caption proceeding with full rights of participation.

Dated: November 27, 2006

Respectfully submitted

/s/ Sidney Mannheim Davies
Sidney Mannheim Davies

Counsel for the California Independent
System Operator Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have, this 27th day of November 2006, caused to be served a copy of the forgoing document upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

/s/ Sidney Mannheim Davies
Sidney Mannheim Davies