

California Independent System Operator
Richard Jacobs, Assistant Corporate Counsel
151 Blue Ravine Road
Folsom, California 95630

California Independent System Operator
ISO Governing Board
Mr. Jan Smutney-Jones, Chair of the Board
151 Blue Ravine Road
Folsom, California 95630

California Independent System Operator
ISO Governing Board
Charles F. Robinson, General Counsel and Corporate Secretary
151 Blue Ravine Road
Folsom, CA 95630

American Arbitration Association (as delegated agent for the ISO ADR Committee)
Ms. Molly Bargaquest, Vice President – Case Management Center
1750 Two Galleria Tower
13455 Noel Road
Dallas, Texas 75240-6636

Ms. Julie Petersen
Manager, Elec. Trans. Svcs.
Pacific Gas & Electric Company
77 Beale Street B13J
San Francisco, CA 94105

Mark D. Patrizio, Esq.
Kelly M. Morton, Esq.
Pacific Gas & Electric Company
77 Beale B30A
San Francisco, CA 94105-9612

**Statement of Claim of the Northern California Power Agency
Pursuant to the ISO Tariff § 13.2.2**

October 19, 2000

The Northern California Power Agency (NCPA) hereby submits its statement of claim as an interested party to the dispute set forth in the October 5, 2000 Statement of Claim by Pacific Gas & Electric Company (PG&E). NCPA represents a number of its member-customers who hold transmission entitlements in the California Oregon Transmission Project (COTP) and who purchase power from the Western Area Power Administration

(Western). As such, NCPA believes that if the ISO charges of which PG&E complains are permitted to stand, PG&E will ultimately seek recovery of a portion of those costs from NCPA and its members. NCPA does not here opine on the chances of success such an effort might have, and does not seek here any resolution of any claim the losing party in the instant dispute initiated by PG&E might have against NCPA. However, as a party from whom PG&E would likely seek recourse if these charges stand, NCPA has a direct and substantial interest in the outcome of this proceeding.

Parties to the Dispute: California Independent System Operator Corporation (CAISO)
Pacific Gas & Electric Company (PG&E)

Other Potentially Interested Parties: Western Area Power Administration (Western)
Sacramento Municipal Utility District (SMUD)
Other holders of transmission entitlements on the
California-Oregon Transmission Project (COTP)

Claim: PG&E claims that from April, 1998 to April 1999, the CAISO improperly billed PG&E for charges amounting to \$14,172,337.08.

Relief Sought: PG&E seeks reimbursement of that amount plus Interest, and any other just and reasonable relief.

Summary of Claim: NCPA believes that if the charges protested by PG&E are permitted to stand, PG&E will seek recourse against NCPA or its members. NCPA does not seek to raise additional issues beyond those between PG&E and the CAISO as identified by PG&E in its summary of claim, but seeks to protect its own interests with regard to that claim as they may appear.

Knowledgeable Individuals: NCPA has no one to add to the list compiled by PG&E.

Service:

NCPA designates the following individuals for communications:

Robert C. McDiarmid
Lisa G. Dowden
Spiegel & McDiarmid
1350 New York Ave., NW
Ste. 1100
Washington, DC 20005
202-879-4000

Mr. George A. Fraser
General Manager
Northern California Power Agency
180 Cirby Way
Roseville, CA 95678
916-781-3636

