

Accession No.

200803195099

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Placer County Water Agency )  
 )  
 ) Project No. 2079-061  
 (Middle Fork American  
 River Project)

**MOTION TO INTERVENE  
OF PACIFIC GAS AND ELECTRIC COMPANY**

Pursuant to Rule 214<sup>1</sup> of the Commission's Rules of Practice, and the February 11, 2008, Notice the Federal Energy Regulatory Commission ("Commission" or "FERC"), initiating its National Environmental Policy Act ("NEPA") process for the above-captioned project, Pacific Gas and Electric Company ("PG&E") submits this Motion To Intervene in the proceedings for Placer County Water Agency's ("Agency's") Application for a New License ("Application") for Project No. 2079.

**I. MOTION TO INTERVENE**

PG&E is a California utility, organized and existing under the laws of the State of California, with its principal place of business at 77 Beale Street, San Francisco, California, 94105. PG&E is a FERC-jurisdictional public utility that transmits electric energy in interstate commerce. PG&E is also a Participating Transmission Owner (PTO) that has placed its electric transmission facilities under the operational control of the California Independent System Operator Corporation (CAISO) and a Scheduling Coordinator (SC) certified by the CAISO that schedules transmission and purchases and sells electricity and ancillary services through the CAISO's markets. PG&E is also one of the largest Load Serving Entities (LSEs) in California,

<sup>1</sup> 18 C.F.R. § 385.214 (2007)

distributing natural gas and electricity to a population of approximately 14 million people throughout northern and central California.

PG&E is an applicant for a new license for its FERC Project No. 2479, which is directly connected to the Agency's Project No. 2079, as described in PG&E's Notice of Intent to File Application For a New License. PG&E's Project No. 2497 is a transmission line only project that interconnects the Agency's Project No. 2079 with the California interconnected power grid. Issues under NEPA that affect or impact the Agency's Project No. 2079 may also impact PG&E's Project No. 2497. In addition, the Agency is studying modifications to Project No. 2079, which may directly affect PG&E's Project No. 2479. For these reasons, PG&E has a direct and substantial interest in, and may be affected by, the instant proceeding. No other party can adequately represent PG&E's interests. Accordingly, PG&E respectfully requests that the Commission permit it to intervene in this proceeding, with all the rights attendant to such status.

## **II. COMMUNICATIONS**

PG&E designates the following for service on the Commission's service list in this proceeding and/or for communications regarding the instant filing:

Mark D. Patrizio, Esq.  
Alyssa T. Koo, Esq.<sup>2</sup>  
Pacific Gas and Electric Company Law Department  
Post Office Box 7442  
San Francisco, CA 94120  
Telephone: (415) 973-3386  
Facsimile: (415) 973-5520  
E-Mail: MDP5@pge.com; ATK4@pge.com

PG&E requests that overnight deliveries be made to:

Alyssa T. Koo  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B30A  
San Francisco, CA 94105

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<sup>2</sup> Person designated for official service pursuant to Rule 2010. See 18 C.F.R. § 385.2010 (2006).

PG&E further requests that a copy of all communications in these proceedings be provided to:

Forrest Sullivan  
Pacific Gas and Electric Company  
5555 Florin-Perkins Road  
Sacramento, CA 95826  
Telephone: (916) 386-5580  
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Pacific Gas and Electric Company  
Regulatory File Room  
77 Beale Street, Room 3120, Mail Code B30A  
San Francisco, CA 94105  
E-mail: [LawFERCCases@pge.com](mailto:LawFERCCases@pge.com)

### III. CONCLUSION

PG&E respectfully requests that the Commission grant this Motion to Intervene in these proceedings.

Dated: March 19, 2008

Respectfully Submitted,  
MARK D. PATRIZIO  
ALYSSA T. KOO

By:                   /s/ Alyssa T. Koo                    
ALYSSA T. KOO

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Attorneys for  
PACIFIC GAS AND ELECTRIC COMPANY

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this day caused the foregoing document upon all parties designated on the official service list in docket numbers P-2079-000 and P-2479-000 in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Dated at San Francisco, California this 19th day of March 2008.

/s/ Amy S. Yu

Amy S. Yu

PACIFIC GAS AND ELECTRIC COMPANY  
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San Francisco, CA 94105

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