

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
1.	<p>It is unclear how the ISO will reconcile the metering standards contained in Existing Contracts with those now proposed by the ISO.</p> <p>Comments and Protest of the Transmission Agency of Northern California ("TANC") to the October 31, 1997 Compliance Filings of the California Independent System Operator Corporation and California Power Exchange Corporation, Docket Nos. EC96-19-006, <u>et al.</u>, filed November 21, 1997 ("TANC I").</p>	TANC I at 10.	The Commission finds that it is premature to address these and other issues until such time as the ISO's proposal is more fully developed.	81 FERC ¶ 61,320, at 62,473 (December 17, 1997).
2.	<p>The ISO has not fully explained what an entity needs to do in order to operate as a Metered Subsystem.</p> <p><i>Numerous intervenors.</i></p>		In light of the numerous comments the Commission has received to date on this issue, the Commission finds that there are many issues still unresolved with regards to the Metered Subsystem concept and the related agreements. Therefore, we will address issues related to the Metered Subsystem concept when the ISO completes its Metered Subsystem proposal.	81 FERC at 62,477.

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3.	<p>Ancillary Services Requirements Protocols: ISO should make numerous language changes as set out in Table 1 attached to BPA comments, in order to be able to implement the specified procedures in cases where the Ancillary Services are being offered by System Resources located outside the ISO grid.</p> <p><i>Motion to Intervene, Protest and Comments of the Bonneville Power Administration ("BPA") Regarding the California Independent System Operator Corporation and California Power Exchange Corporation Protocols, Pro Forma Agreements and Proposed Tariff Changes Filed October 31, 1997, Docket Nos. ER96-19-006, et al., filed November 21, 1997 ("BPA I").</i></p>	<i>BPA I</i> at 7-10.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC ¶ 61,320, at 62,471 (December 17, 1997).
4.	<p>Ancillary Services Requirements Protocol: Section 4.4.1 of the ASRP, Dynamic Schedules, is ambiguous and could be interpreted to exclude parties from the ancillary services market.</p> <p><i>BPA.</i></p>	<i>BPA I</i> at 12-13.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

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5.	<p>Metering Protocol: Section 13.5.1(b)(l) of the MP unnecessarily and unduly discriminates against imports of Ancillary Services and unreasonably burdens tie points.</p> <p><i>BPA.</i></p>	<i>BPA I</i> at 13-15.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
6.	<p>Scheduling and Billing Protocol: The SABP does not recognize sales of Ancillary Services from system resources and incorrectly states the formula for inadvertent interchange.</p> <p><i>BPA.</i></p>	<i>BPA I</i> at 16-17.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
7.	<p>Proposed new Section 2.5.7.4 is unnecessary and unduly discriminatory against Ancillary Services providers that are located outside the ISO control area that would otherwise be qualified to and wish to participate in the Ancillary Services market in California or who could economically self provide those services using resources located outside of the ISO control area.</p> <p><i>BPA.</i></p>	<i>BPA I</i> at 25-27.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.

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8.	<p>Metering Protocol: Section 2.4 lacks an obligation of the ISO to promptly respond to requests for data and should be revised to provide one. Also, the meter data is the interest of the entity whose data was collected and transmitted to the ISO, not necessarily the Scheduling Coordinator that the entity engaged at the time. The language should be changed to reflect this.</p> <p><i>BPA.</i></p>	<i>BPA / Table 3 at 1.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
9.	<p>Metering Protocol section 10.1: Changes to the validation, editing and estimation procedure should be subject to ISO Technical Advisory Committee approval and notice of proposed changes should be provided to all ISO Metered Entities.</p> <p><i>BPA.</i></p>	<i>BPA / Table 3 at 1.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
10.	<p>Metering Protocol section 12.1: The second and third sentences seek to place an unnecessary and unreasonable burden on SC Metered Entities, and should be deleted. There is no justification for this requirement, particularly in the case of SC Metered Entities that represent only non-California entities.</p> <p><i>BPA.</i></p>	<i>BPA / Table 3 at 1.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

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11.	<p>Scheduling Protocol section 1.3.1(d): The Interconnected Control Area Agreement will set forth the entire agreement regarding the coordination of schedules at the interconnection between the ISO and adjacent control areas. Delete inclusion of interfacing control area operators in section 1.3.1(d).</p> <p><i>BPA.</i></p>	<i>BPA / Table 3 at 1.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
12.	<p>Scheduling Protocol sections 3.2.6.3 and 3.2.8.3: The protocol requires the ISO to invalidate a Submittal for all Settlement Periods of the relevant Trading Day if the Submittal for any one Settlement Period is invalid. There is no technical reason for requiring that all periods be invalidated and the result is unreasonable and punitive.</p> <p><i>BPA.</i></p>	<i>BPA / Table 3 at 2.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
13.	<p>Scheduling Protocol section 3.2.8.1(b): In subsection (b) it is unclear why the ISO will allow the submissions of revised ranges but not prices in a SC's Adjustment Bids. There is no apparent reason for this restriction.</p> <p><i>BPA.</i></p>	<i>BPA / Table 3 at 2.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

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14.	<p>Outage Coordination Protocol section 1.3.1(d): The Interconnected Control Area Agreement will set forth the entire agreement regarding the coordination of outages affecting the interconnection between the ISO and adjacent control areas. Inclusion of Connected Entities that are adjacent control areas in section 1.3.1(d) should be deleted.</p> <p><i>BPA.</i></p>	<i>BPA / Table 3 at 2.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
15.	<p>Outage Coordination Protocol section 3.1.6: The Interconnected Control Area Agreement will set forth the entire agreement regarding the coordination of Maintenance Outages affecting the interconnection between the ISO and adjacent control areas. Section 3.1.6 should be deleted.</p> <p><i>BPA.</i></p>	<i>BPA / Table 3 at 2.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

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16.	<p>Outage Coordination Protocol section 5.2: The Interconnected Control Area Agreement will set forth the entire agreement regarding scheduling and approval of Maintenance Outages affecting the interconnection between the ISO and adjacent control areas. Section 5.2 should be deleted.</p> <p><i>BPA.</i></p>	<i>BPA / Table 3 at 2.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
17.	<p>Dispatch Protocol section 1.3.1(e): The Interconnected Control Area Agreement will set forth the entire agreement between the ISO and adjacent control areas regarding the coordination of information on and mitigation of adverse conditions affecting the reliable operation of the interconnection. Inclusion of Control Area Operators that are adjacent control areas in section 1.3.1(e) should be deleted.</p> <p><i>BPA.</i></p>	<i>BPA / Table 3 at 2-3.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

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18.	<p>Dispatch Protocol section 3.8: The Interconnected Control Area Agreement will set forth the entire agreement between the ISO and Control Area Operators that are adjacent control areas regarding information or data to be supplied or exchanged, including metering data, and scheduling and checkout procedures for Interconnection schedules. Section 3.8 should be deleted in its entirety, to the extent that it applies to Control Area Operators that are adjacent control areas.</p> <p><i>BPA.</i></p>	<i>BPA / Table 3 at 3.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
19.	<p>Dispatch Protocol section 4.1.2: The provision states that the ISO will access all Ancillary Services by use of the telephone. This provision could hinder operations in the WSCC because the time necessary to make the calls in real time could exceed the time available.</p> <p><i>BPA.</i></p>	<i>BPA / Table 3 at 3.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

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20.	<p>Outage Coordination Protocol section 5.3.2 overlaps with section 5.3.1. The section should be clarified to provide that it applies only to facilities not covered by section 5.3.1.</p> <p><i>Comments on Behalf of the Cities of Anaheim, Colton and Riverside, California and Asuza and Banning, California ("Southern Cities") on ISO Protocols, Pro Forma Agreements and Tariff Changes, Docket Nos. EC96-19-008 and ER96-1663-009, filed November 21, 1997 ("Southern Cities I").</i></p>	<i>Southern Cities I</i> at 10.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
21.	<p>Outage Coordination Protocol section 5.5 requires clarification. It is not clear whether there are different procedures applicable to Participating TOs versus Operators.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 10.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

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22.	<p>The ASRP appears inconsistent in describing the different types of resources that may provide a given ancillary service. For example, the provision of regulation and spinning reserves seems limited to Generating Units while other protocols allow for these services to be provided by System Resources.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 11.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
23.	<p>ASRP section 1.3.1(b) is inadequately defined and should specify which Operators are expected to abide by the Protocol.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 11.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
24.	<p>Previous drafts of sections 4.1.4 and 4.1.5 of the ASRP should be incorporated to specify the times by which the ISO would publish its estimated requirements for Regulation and provide guidance for participants.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 11.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
25.	<p>Section 4.2 of the ASRP should be expanded to include System Resources.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 11.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

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26.	<p>Because entities providing Regulation service under section 4.2.2 of the ASRP cannot be held accountable for ISO EMS control and related SCADA equipment not under their control, the language in section 4.2.2 needs to be modified.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 11-12.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
27.	<p>Section 5.1.2 of ASRP should not be limited to only Generating Units.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 12.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
28.	<p>The ISO's explanation of section 5.2 of the ASRP (software limitations) should not be dispositive. The ISO should be directed to weigh the burden imposed by the limitation against the cost of making necessary adjustments to the software.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 12.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
29.	<p>ASRP section 5.8.2 limiting procurement of Spinning and Non-Spinning Reserves to suppliers located within the ISO Controlled Grid could be extremely uneconomic and impose a significant burden on participants.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 12.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

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30.	<p>Section 6.1.2 of the ASRP should specify when the Replacement Reserve requirement will be determined and how it will be communicated to participants.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 12.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
31.	<p>ASRP section 6.5.2 limits the supply of Replacement Reserve to providers located within the ISO Controlled Grid and may result in increased Ancillary Services costs to all Market Participants.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 12.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
32.	<p>Section 7.3 of the ASRP should specify the consequences of failing to supply sufficient Voltage Support.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 12.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
33.	<p>Subpart (b) of section 11.3 of the ASRP should be deleted. There is no apparent reason why a warning notice should expire prior to a retest; the mere passage of time is not likely to result in improved performance.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 12.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

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34.	<p>Appendix F section 4 of ASRP should require the ISO to respond to a request for reconsideration within 60 days of that request.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 13.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
35.	<p>SABP section 1.2.4's reference to "prevailing Pacific Standard Time" is confusing. It is not clear whether or not Daylight Time will be recognized.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 13.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
36.	<p>Section 6.10.3 of the SABP is inadequate and does not protect the rights of all customers that depend upon the SC being terminated.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 13.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
37.	<p>Preliminary and Final Settlement Statement potentially will contain commercially sensitive information that should be available to all users of the WEnet, and section 8.1 and Appendix 1 (section 9.1) of the SABP should be modified.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 14.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

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38.	<p>Numerous sections in the Protocols refer to "requirements" set forth in Section 16 of the ISO Tariff. But that section of the Tariff in fact contains no requirements or standards. The previous drafts of these sections are more appropriate.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I passim.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
39.	<p>Section 3.1.4 of the MP should direct the ISO to make the Technical Specifications available for review.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 14.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
40.	<p>The ISO's ability to impose requirement for additional metering facilities should be limited in section 5.1.1 of the MP.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 14.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
41.	<p>An applicant is entitled to a specific reason for ISO rejection of an application, not just generalized boilerplate reference. Section 3.1(b) of the Scheduling Coordinator Application Protocol should be modified.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 15.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

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42.	<p>The proposed form of software licensing (discussed in section 5.1(b) of the SCAP) should be made available for review and comment by potential SCs and other interested parties.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 15.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
43.	<p>Section 7.2 of the SCAP providing for suspension of a SC's scheduling rights must address how the SC's customers will simultaneously obtain a replacement SC.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 15.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
44.	<p>Additional language should be added to section 7.3 and Appendix A of SCAP to make clear that although a SC should commit to compliance with duly adopted ISO procedures and protocols, it does not give up its rights to challenge or request changes to such procedures and protocols.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 15 and 16.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
45.	<p>The requirement that an applicant must report to the ISO within 3 business days any changes regarding the information set forth in the Application Form is unreasonable. Appendix A (section 6.2) of the SCAP should be changed to 7 days.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 16.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

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46.	<p>Sections 3.3.3 and 3.3.4 of the SBP are not clear as to what types of instructions can be exercised independent of the ISO and what types cannot. The ISO should be directed to provide examples.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 16.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
47.	<p>SP section 3 should provide 7 days notice of any variation in timing requirements.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 17.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
48.	<p>There is no justification for rejecting submittals for an entire Trading Day due to a technical defect in a submittal for one Settlement Period. Sections 3.2.6.3 and 3.2.8.3 should be modified.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 17.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
49.	<p>Section 4.2.2 of the DP should provide for access to ISO voice recordings by entities receiving Dispatch Instructions.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 18.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

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50.	<p>Proposed Emergency Guidelines and Load Shedding and Load Restoration priorities (discussed in sections 10.2.4 and 10.2.7 of the DP) should be made available promptly for review and comment by participants.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 19.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
51.	<p>Section 2.5.20.5.1 of the Tariff should be rejected. There is no reason for rejecting an entire day's schedules for self provision of Ancillary Services due to a technical defect in the information submitted for just one hour.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 19-20.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
52.	<p>Section 2.2.4.7.1 of the Tariff is unclear. The language "will receive service at UDC rates" is inappropriately vague and ambiguous.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 20.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
53.	<p>The ISO should not be permitted to impose additional metering requirements except to the extent such additional facilities are necessary to permit the ISO to fulfill obligations with respect to the ISO Controlled Grid. Section 10.2.2 of the Tariff should be modified.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 20.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.

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54.	<p>The time allowed for SCs to review Preliminary Settlement Statements (discussed in Sections 11.6.1.2 and 11.7.2) is too brief. If the ISO requires additional time to consider comments regarding Preliminary Settlement Statements, it should add time at the end of the process and not reduce the time available for SC review.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities I</i> at 20.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
55.	<p>NYMEX is concerned that the coordination between the ISO and PX, under the proposed Market Monitoring and Information Protocol, will be so pervasive as to blur the operational lines between these two entities. By law, the ISO and PX are required to remain independent of each other.</p> <p><i>Comments of the New York Mercantile Exchange, Docket Nos. EC96-19-006, et al., filed November 21, 1997 ("NYMEX").</i></p>	<i>NYMEX</i> at 3.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

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56.	<p>Section 2.5.3.2 of the Tariff is subject to multiple interpretations and requires clarification.</p> <p><i>Comments, Protest and Renewed Request for Hearing of the Cities of Redding and Santa Clara, California, and the M-S-R Public Power Agency, Docket Nos. EC96-19-010, et al., filed December 4, 1997 ("Cities/M-S-R").</i></p>	<i>Cities/M-S-R</i> at 9-11.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
57.	<p>Section 16.2, in conjunction with Sections 16.1 and 20.1.3, allows the ISO Board to establish an amendment process and amend the protocols by unilateral action of the ISO Board on 30 days notice, thus depriving the Commission of any review of the amended protocols.</p> <p><i>Cities/M-S-R.</i></p>	<i>Cities/M-S-R</i> at 12.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
58.	<p>The ISO should utilize the least expensive Generating Units for all Ancillary Services, including Voltage Support. The ISO should be required to utilize the least-cost Generating Units and clearly incorporate that concept in its "merit order stack" criterion (in Section 2.5.18 of the Tariff).</p> <p><i>Cities/M-S-R.</i></p>	<i>Cities/M-S-R</i> at 15.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.

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59.	<p>The review period for Preliminary Settlement Statements should be extended to one month and the Tariff should reflect that failure to identify a billing error does not preclude an SC's right to challenge the bill until the expiration of any relevant statute of limitations.</p> <p><i>Cities/M-S-R.</i></p>	<i>Cities/M-S-R</i> at 16-17.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
60.	<p>The ISO Tariff should not compel any Participating Transmission Owner to violate restrictions applicable to facilities that are part of a system financed with Local Furnishing Bonds. SDG&E requests that the following language be inserted at the beginning of Dispatch Protocol: section 8.5: "Subject to Section 1.2.3 of the ISO Tariff and related ISO protocols and operating procedures." This language safeguards any financing that Participating Transmission Owners have secured with tax-exempt Local Furnishing Bonds.</p> <p><i>Intervention and Protest of San Diego Gas & Electric Company, Docket Nos. EC96-19-008 and ER96-1663-009, filed November 21, 1997 ("SDG&E").</i></p>	<i>SDG&E</i> at 12.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
61.	<p>The Scheduling Protocol is inconsistent with FERC's directive and the ISO Tariff in its proposed treatment of conditional firm transmission rights under Existing Contracts (specifically Path 15).</p> <p><i>Comments and Protest of the California Municipal Utilities Association, Docket Nos. EC96-19-008 and ER96-1663-009, filed November 21, 1997 ("CMUA").</i></p>	CMUA at 9-10.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
62.	<p>SP 7.2 proposes to put all ISO Tariff users, whether formerly PG&E native load, or any other new user, ahead of conditional firm users under Existing Contracts. SP 7.2 relegates conditional firm users under Existing Contract to a lower priority than new users under the ISO Tariff, representing a diminishment in the value of Existing Contracts.</p> <p><i>CMUA.</i></p>	CMUA at 10-11.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
63.	<p>Scheduling Protocol is inconsistent with the ISO's Tariff in which the ISO states that it will have no role in interpreting Existing Contracts. The ISO does so when it establishes range values of Adjustment Bids to reflect its interpretation of the relative priorities of Existing Contracts vis a vis the rights of users of the ISO Tariff.</p> <p><i>CMUA.</i></p>	<i>CMUA</i> at 11-12.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
64.	<p>There is a lack of appropriate restraints on the ISO's ability to monitor and take action against allegedly anticompetitive behavior through its MMIP. Section 2 of the MMIP lists an overly broad range of "anomalous market behavior" that is subject to scrutiny. This allows the ISO to act with impunity, potentially harming a participant, yet remain free from liability. Due process provisions need to be put in place.</p> <p><i>Protest of Enron Power Marketing, Inc. ("Enron"), Docket Nos. EC96-19-008 and ER96-1663-009, filed November 21, 1997 ("Enron I").</i></p>	<i>Enron I</i> at 2.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
65.	<p>Section 2.3.2 of the MMIP allows the ISO to “publicize such activities or behavior and it’s recommendations thereof, in whatever medium it believes most appropriate.” The ISO should not publicize its investigations and label a participant as engaging in anticompetitive behavior before an official enforcement action has begun.</p> <p><i>Enron.</i></p>	<i>Enron I</i> at 2-3.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
66.	<p>Section 4.5.2 of the MMIP is objectionable because a participant that fails to comply with arbitrary and possibly unreasonable demands from the ISO for information is subject to sanctions. Safeguards must be placed against discovery abuses by the ISO. Otherwise, the ISO can wrongfully threaten participants to reveal information.</p> <p><i>Enron.</i></p>	<i>Enron I</i> at 3.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
67.	<p>With respect to the discussion of protocol and activity rule changes (MMIP section 7.1), Tariff changes (MMIP section 7.2) and sanctions and penalties (MMIP section 7.3), Enron objects to these provisions allowing the ISO Governing Board to make changes to the protocols without Commission approval.</p> <p><i>Enron.</i></p>	<i>Enron I</i> at 3.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
68.	<p>MMIP 2.3.3 in appropriate circumstances permits the Market Surveillance Unit to institute ADR procedures involving participants to determine whether a particular practice is better characterized as improper gaming or legitimate aggressive competition. This should not be a matter subject to ADR. The monitoring protocols set up elaborate committees and their judgment should not be subject to ADR.</p> <p><i>Motion to Intervene of the Northern California Power Agency ("NCPA"), Protest, Request for Further Proceedings, and Motion for Summary Modification Or Rejection of ISO Submission, Docket Nos. EC96-19-008 and ER96-1663-009, filed November 21, 1997 ("NCPA I").</i></p>	NCPA I at 10-11.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
69.	<p>Amendments to sections 2.5.28.1 and 2.3.4.4.2 of the ISO Tariff are not explained.</p> <p><i>NCPA.</i></p>	NCPA I at 11.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
70.	<p>Section 2.5.24 states that the ISO has the authority to suspend Metered Subsystem control and to direct the operation of the Metered Subsystem's units, if necessary to maintain Grid reliability. This language is overbroad and the ISO's authority to suspend Metered Subsystem's control and to place its units under the ISO control should be limited to time of emergencies only.</p> <p><i>Motion to Intervene and Comments of Turlock Irrigation District ("Turlock"), Docket Nos. EC96-19-008 and ER96-1663-009, filed November 21, 1997 ("Turlock I").</i></p>	<i>Turlock I</i> at 15.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
71.	<p>It is not clear why the ISO is proposing to amend the Metered Subsystem Regulation Error provision.</p> <p><i>Turlock.</i></p>	<i>Turlock I</i> at 15.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
72.	<p>Intent of the Metered Subsystem definition needs to be clarified.</p> <p><i>Turlock.</i></p>	<i>Turlock I</i> at 16-17.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
73.	<p>The proposal to modify Sections 2.5.3.2 and 2.5.20.1 of the Tariff fails to recognize other firm purchases. Utilities purchasing firm power will now be required to carry Operating Reserves for those purchases.</p> <p><i>Protest and Request for Clarification on the Standard of Review for This Filing by the Sacramento Municipal Utility District ("SMUD"), Docket Nos. EC96-19-008 and ER96-1663-009, filed November 21, 1997 ("SMUD I").</i></p>	SMUD I at 8.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
74.	<p>Strict reading of amended Section 2.5.20.1 would require SMUD to pay for reserves twice, both on firm purchases and pursuant to the reserve requirement of the ISO.</p> <p><i>SMUD.</i></p>	SMUD I at 8.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
75.	<p>Amendment to Section 2.5.24 is objectionable. Previously, the section states that "the ISO shall monitor the provision of Regulation from a MSS" via a MSRE. Now, the "ISO shall monitor the performance of a MSS via a MSRE." This amendment gives the ISO unfettered authority to suspend MSS operations if it determines that (i) it is necessary to maintain reliability or (ii) if the MSS does not conform with Good Utility Practice. This change is inconsistent with Section 5 of the Tariff in addition to allowing the ISO to act unrestrained in non-emergency situations.</p> <p><i>SMUD.</i></p>	<p><i>SMUD I</i> at 10.</p>	<p>All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.</p>	<p>81 FERC at 62,476.</p>
76.	<p>Amended Sections 2.5.6.2 and 2.5.22.10 pass off added responsibilities to Scheduling Coordinators. The Scheduling Coordinators will undoubtedly claim that their costs are increasing (without any corresponding decrease in costs to the ISO). Such costs could then be passed on through the GMC. This subsequently will result in the failure to match cost responsibility with cost causation.</p> <p><i>SMUD.</i></p>	<p><i>SMUD I</i> at 11-12.</p>	<p>All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.</p>	<p>81 FERC at 62,476.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
77.	<p>Revised definition of the "Existing Operating Agreement" would limit the formation of MSSs to those agreements entered into between the ISO and Existing Operating Entities prior to the ISO Operations Date. No explanation as to why such a limitation is justified.</p> <p><i>SMUD.</i></p>	<p><i>SMUD I</i> at 12.</p>	<p>All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.</p>	<p>81 FERC at 62,476.</p>
78.	<p>SMUD disagrees with amended Section 2.4.4.5 which states that the "ISO will require" an automated solution using its "Congestion Management software" to deal with transmission rights under Existing Contracts. In many instances, those rights are implemented manually by existing control area operators. SMUD has seen no technical justification from the ISO that past practices in this regard cannot be implemented by the ISO. Further, the ISO's proposal is inconsistent with the Commission's recognition of the need to accommodate Existing Contracts.</p> <p><i>SMUD.</i></p>	<p><i>SMUD I</i> at 14.</p>	<p>All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.</p>	<p>81 FERC at 62,476.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
79.	<p>Proposed amendment to Section 7.3.2 deletes reference to the Grid Operations Charge – IntraZonal Congestion – but fails to reflect that certain Scheduling Coordinators will not be providing Adjustment bids such that the ISO will be using them to manage IntraZonal Congestion. SMUD suggests new language.</p> <p><i>SMUD.</i></p>	<p><i>SMUD I</i> at 14-15.</p>	<p>All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.</p>	<p>81 FERC at 62,476.</p>
80.	<p>SBP 2.4.2 raises the issue of adjustments for Transmission Losses. As proposed, this protocol fails to include the appropriate treatment for losses under Existing Contracts. The ISO should recognize that certain SCs or MSSs have the right to absorb internal losses within their systems and should not be subject to being charged for losses twice.</p> <p><i>SMUD.</i></p>	<p><i>SMUD I</i> at 23.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
81.	<p>SBP addresses changes to the operating instructions that RPTOs submit on behalf of holders of Existing Rights. It is entirely possible that this presents a violation of Existing Rights, and if so, must be revised.</p> <p><i>SMUD.</i></p>	<p><i>SMUD I</i> at 23-24.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
82.	<p>The Ancillary Services Requirements Protocols suffer from the ISO's back-pedaling in order to justify the shortcomings of the software instead of providing ground rules to foster a reasonable market for such products. SMUD's primary concern is the constant use of the reference to Zonal determination in the need for various Ancillary Services. The ISO makes no commitments to the resolution of this issue.</p> <p><i>SMUD.</i></p>	SMUD I at 24.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
83.	<p>The balkanization of the Ancillary Services markets creates a situation where Ancillary Services cannot be competitively supplied across Zones and thereby potentially creates thinner, less competitive markets.</p> <p><i>SMUD.</i></p>	SMUD I at 24-25.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
84.	<p>DP 6.9 is very general and understanding of how the ISO will implement this function is not given. SMUD provides language suggestions.</p> <p><i>SMUD.</i></p>	SMUD I at 25-26.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
85.	<p>DP 6.9.2(c) leaves only the ISO to resolve problems with the ISO Control Area. The ISO must also have the responsibility and authority to instruct other subregions to take corrective action to ensure reliability of the grid.</p> <p><i>SMUD.</i></p>	<i>SMUD I</i> at 25.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
86.	<p>DP 7 and DP 8.1 do not recognize Existing Right and Non-Converted Rights holders within the hour scheduling rights.</p> <p><i>SMUD.</i></p>	<i>SMUD I</i> at 26.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
87.	<p>DP 10 proposes a prioritized schedule for shedding and restoring load and adjusting generation to manage Emergencies. One of the most likely Emergencies is the loss of transmission ties. The ISO must put the restoration of transmission ties as the first priority, then the restoration of load.</p> <p><i>SMUD.</i></p>	<i>SMUD I</i> at 26-27.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
88.	<p>The Qcharge_j in the SABP substitutes the term metered "consumption" for metered "Demand." Consumption is undefined and creates ambiguity.</p> <p><i>SMUD.</i></p>	<i>SMUD I</i> at 27.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
89.	<p>Grid Operations Charge, SABP Appendix B 2.2, substitutes and employs the undefined term "consumption" in calculating the charge.</p> <p><i>SMUD.</i></p>	<i>SMUD I</i> at 27.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
90.	<p>The ISO must continue to develop its protocols, and accelerate that development if necessary, in order to provide market participants the ability to trade through more than one Scheduling Coordinator.</p> <p><i>Motion to Intervene and Protest of Electric Clearinghouse Inc. ("ECI") on October 31, 1997 Submittals, Docket Nos. EC96-19-006, et al., filed November 21, 1997 ("ECI I").</i></p>	<i>ECI I</i> at 6.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
91.	<p>The ISO, in the Outage Coordination Protocol, must defer to generators' existing maintenance schedules when coordinating maintenance outages so as not to impose additional conditions or burdens on these facilities.</p> <p><i>ECI.</i></p>	<i>ECI I</i> at 6 and 9.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
92.	<p>ASRP 5.8.2 and ASRP 6.5.2 are objectionable. Scheduling Coordinators must be permitted the flexibility to procure ancillary services from outside the ISO controlled grid.</p> <p><i>ECI.</i></p>	<i>ECI I</i> at 6.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
93.	<p>Scheduling Coordinators, under section 8.1 of the SABP, must not be forced to invest in systems to accommodate the processing of ISO invoices via EDI. This procedure is burdensome and unnecessary.</p> <p><i>ECI.</i></p>	<i>ECI I</i> at 6 and 12-13.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
94.	<p>ASRP section 4.3 refers to Regulation by Zone. It is unclear why the ISO seeks to define Regulation by Zone, inasmuch as the physics of the system as a whole will determine whether there is an area control error (ACE) for the entire grid. The ISO should be required to clarify why it apparently intends to control based on Zones rather than the ACE for the entire grid.</p> <p><i>ECI.</i></p>	<i>ECI I</i> at 10.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
95.	<p>ASRP 5.3.1, ASRP 5.4.2 and ASRP 6.2.2 are confusing, and unnecessary, in that they present no additional qualifications applicable to a Scheduling Coordinator who is seeking to determine whether it would qualify to provide particular service. These provisions should be clarified and should state the minimum requirement applicable to Scheduling Coordinators seeking to provide services, i.e., the ability to provide service for 2 hours.</p> <p><i>ECI.</i></p>	<i>ECI I at 10.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
96.	<p>ASRP 7.3 is unclear. For instance, it is unclear how a generator would know what "sufficient reactive supply" is if it does not know the substation voltage. In order to provide an adequate level of information to enable generators to make this determination, the ISO must be directed to designate a party responsible for monitoring voltage and a party responsible for providing the signal to change reactive output, as well as set forth the limitations on what steps the receiver of the signal must take in order to provide this service.</p> <p><i>ECI.</i></p>	<i>ECI I at 12.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
97.	<p>ISO's proposed changes to the Tariff regarding self provision of losses are unworkable and inconsistent with the agreement being reached with parties responsible for administering existing contracts and must be corrected.</p> <p><i>Comments of Southern California Edison Company to the California Independent System Operator Corporation's Proposed Tariff Amendments and Motion for Waiver, Docket Nos. EC96-19-010 and ER96-1663-011, filed December 4, 1997 ("Edison").</i></p>	<i>Edison at 9-10.</i>	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
98.	<p>New Section 2.2.7.6 of the Tariff cannot be reviewed at this time because the Existing Operating Agreements do not yet exist. To Edison's knowledge, there are no Existing Operating Agreements in existence and it is not possible to determine whether it is reasonable to permit such agreements to supersede the ISO Tariff.</p> <p><i>Edison.</i></p>	<i>Edison at 11.</i>	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
99.	<p>Section 2.5.20.1 of the Tariff, dealing with allocation of the costs of Ancillary Services, should be revised to use real time demand, rather than schedule demand.</p> <p><i>Edison.</i></p>	<i>Edison at 11-12.</i>	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
100.	<p>Changes to Section 2.5.28.4 of the Tariff were done without explanation. Without any information, it is impossible to determine whether the changes are just and reasonable.</p> <p><i>Protest and Comments of the Northern California Power Agency, Docket Nos. EC96-19-010 and ER96-1663-011, filed December 4, 1997 ("NCPA II").</i></p>	<i>NCPA II</i> at 8.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
101.	<p>Amendment to Section 2.5.7.2 of the Tariff provides that where there is interzonal congestion, the ISO will purchase Ancillary Services in each zone separately. There is no explanation of why this will be done.</p> <p><i>NCPA.</i></p>	<i>NCPA II</i> at 8.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
102.	<p>Proposed amendment to Section 11.2.4.1 of the Tariff consists primarily of unexplained formulae and changes.</p> <p><i>NCPA.</i></p>	<i>NCPA II</i> at 8-9.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
103.	<p>The provision providing that the EOA will prevail over the SP should be expanded to include any agreement.</p> <p><i>TANC.</i></p>	<i>TANC I</i> Appendix A at 1.	The Commission will require the to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
104.	<p>SP sections 3.1.1, 4.1 and others do not provide justification for the changes to the concept of "Balanced Schedules" as defined in the Master Definitions Supplement. At a minimum, the SP should provide more clearly that the "Balanced Schedules" of Metered Subsystems and other existing operating entities will be measured by net load.</p> <p>TANC.</p>	TANC I Appendix A at 1.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
105.	<p>The consequences of invalidation of an SC's "submittal" for all Settlement Periods of the Trading Day (SP sections 3.2.6.3, 3.2.8.3 and 3.3.1.3) should be explained.</p> <p>TANC.</p>	TANC I Appendix A at 1.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
106.	<p>The provisions of section 3.2.9(f) of the SP should be expanded to be consistent with section 3.3.2(f) regarding the lack of need for change if the other Control Area operator's records are in error. Furthermore, the procedure by which the ISO will determine an "affected SC" regarding the mismatch of intertie schedules should be described.</p> <p>TANC.</p>	TANC I Appendix A at 1.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
107.	<p>The SP and SBP should recognize that losses may be absorbed internally in a scheduling party's system.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 1 and 5.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
108.	<p>Rather than leaving the responsibility for losses under an Existing Contract to the PTO, the SP section 4.3 should provide for losses to be specified in the operating instructions to be developed jointly by the PTO and the Existing Contract rights holder. Moreover, the section should indicate how the ISO will determine for such difference in losses its "mechanism acceptable to the PTO to roll any associated shortfall or surplus into the ISO rates and charges applicable to the PTO" in accordance with Section 2.4.4.4.45 of the ISO Tariff.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 2.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
109.	<p>Sections 7.1.1, 7.3.1 and 7.4.1 of the SP should provide for information regarding Existing Contracts to be set forth in the operating instructions to be developed jointly by the RPTO and the Existing Contract rights holder.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 2.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
110.	<p>Section 7.1.2 of the SP should provide that an Existing Rights holder may be an SC or may use an SC other than a RPTO.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 2.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
111.	<p>The ISO should make clear that TANC's transmission service under the South of Tesla Principles will be treated as "firm" under the SP and ISO Tariff.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 2.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
112.	<p>The failure to submit an "Adjustment Bid" in the ISO format cannot deny an Existing Contract rights holder its contractual right to firm transmission service. Section 7.2.2(a) of the SP should be modified.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 2.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
113.	<p>Sections 7.4.4, 7.5, 7.5.1 and 7.5.2 of the SP are confusing in the apparently conflicting attempts to preserve Existing Contract rights that give parties scheduling flexibility after the close of the ISO's Hour-Ahead scheduling process while simultaneously treating those rights as "available for the ISO's uses." The proposed treatment of any use of such Existing Contract scheduling flexibility as giving rise to Imbalance Energy deviations to be priced and accounted to the SC for that rights holder is unwarranted.</p> <p>TANC.</p>	TANC I Appendix A at 3.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
114.	<p>The SP (section 9) is not clear as to why the SP repeats the Ancillary Services bidding and pricing provisions from the ISO Tariff, particularly when those provision are not repeated in identical form. It appears that there is the possibility of unnecessary inconsistency in those provisions.</p> <p>TANC.</p>	TANC I Appendix A at 3.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
115.	<p>Section 9.9 of the SP should provide for information regarding Ancillary Services under Existing Contracts to be set forth in the operating instructions to be developed jointly by the RPTO and the Existing Contract rights holder. In addition, the SP should clarify what is necessary to account for the "differences" between Ancillary Services requirements in an Existing Contract and those in the SP.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 3.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
116.	<p>Section 10.3 of the SP, addressing Congestion Management and Congestion pricing, do not appear to be sufficiently detailed.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 3.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
117.	<p>The Protocols' references to the Balancing Energy and Ex-Post Pricing software should be more fully explained.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 3 and 6.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
118.	<p>SBP section 2.1.1(c) should include a reference to System Units where Generating Units are referenced.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 4.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
119.	<p>Sections 2.1.1(e) and 2.1.3(j) of the SBP should recognize that Generating Units owned by Local Publicly Owned Electric Utilities that serve native load are a special category not subject to Overgeneration Protocols.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 4.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
120.	<p>Section 2.1.2(c) of the SBP should recognize that an MSS or other existing operating entity will be measured by net load.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 4.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
121.	<p>Section 2.1.4 of the SBP appears to overlook the operational reality that some SCs may not be TOs and thus their transmission rights may not be subject to Usage Charges and their transactions not subject to ISO congestion management operations or charges. The provision should be revised to account for the foregoing.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 4.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
122.	<p>SBP section 3.2 should provide more clearly for the possibility that a service recipient may have the right to schedule directly to the ISO.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 5.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
123.	<p>Section 3.3.1 and the Appendix to the SBP proposes information requirements and electronic format that do not appear to fully account for the complexity associated with operations relating to the California-Oregon Transmission Project or service pursuant to the South of Tesla Principles. They should provide for the provision of more detailed information for those Existing Contracts that are not amendable to the simple categorizations specified.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 5.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
124.	<p>Sections 3.3.5.1, 3.3.5.2 and 3.4 of the SBP should be revised to provide for parties other than RPTOs to submit operating instructions, as provided in SBP 3.2.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 5.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
125.	<p>Section 3.3.5.2 of the SBP should ensure that the ISO will notify an Existing Rights holder, as well as a PTO, of any perceived problem with operating instructions submitted to the ISO so that it may take appropriate actions, both on its system to preserve reliability and under its contract to preserve its rights. In addition, the section should be revised to limit the ISO discretion to reject revised operating instructions and to delay as long as 7 days in implementing those instructions.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 5.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
126.	<p>Sections 6.2, 6.4 and 7.2 of the SBP and reference to the "ISO Data Templates and Validation Rules document" should be clarified.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 5.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
127.	<p>Section 7.1 of the SBP and the "technical aspects" of the ISO communication mechanisms should be specified by the ISO.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 5.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
128.	<p>Section 2.5 of the DP should not include an implication that the SBP and SP may alter the ISO Tariff provisions.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 6.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
129.	<p>Sections 6.2.1, 6.2.2 and 6.2.3 of the DP should provide for review of the ISO Register of PTO transmission facilities over which it proposes to accept control, including facilities below 230kV. Moreover, the DP should incorporate provisions setting forth the ISO's proposed method of exercising Operational Control over facilities that may be owned jointly by PTOs and Non-PTOs.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 6.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
130.	<p>Section 6.4 of the DP should not place the ISO in the position of directing PTO exercise of operation and maintenance functions in non-emergency conditions.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 6.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
131.	<p>Section 10.4.2 of the DP should not attempt to regulate the discretion of Local Regulatory Authorities with regard to load curtailment programs.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 7.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
132.	<p>Section 2.1.1(b) of the ASRP should be deleted. Once the ISO has established its Ancillary Services standards, it should only adjust them in an emergency.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 8.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
133.	<p>The allocation of Regulation should allow for the exclusion of self-provided Regulation and/or be based on net Demand scheduled with the ISO. Section 4.3 of the ASRP should be modified.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 8.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
134.	<p>Sections 4.5.3 and 5.5.1 of the ASRP should make clear that Ancillary Services may be provided by providers that are indirectly connected to the ISO Controlled Grid.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 8.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
135.	<p>Sections 7.5.2 and 8.5.1 of the ASRP should include a description of the length of the initial procurement period for Voltage Support and Black Start capability and a reference to the subsequent procurement process as set forth in the ISO Tariff.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 8.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
136.	The ISO needs to establish the "Technical Specifications" for metering standards (in the MP) and the technical standards for certification and registration of revenue quality meters as soon as possible. <i>TANC.</i>	<i>TANC I</i> Appendix A at 9.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
137.	The definition of "Scheduling Coordinator Metered Entity" (section 1.2.2 of the MP) is over-inclusive, in that it applies to entities that have no connection to the ISO. <i>TANC.</i>	<i>TANC I</i> Appendix A at 9.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
138.	The provisions (sections 2.2.4.3 and 2.3.5 of the MP) prohibiting the netting of Generating Unit output and Demand should be clarified as inapplicable to an MSS. <i>TANC.</i>	<i>TANC I</i> Appendix A at 9.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
139.	The MP (section 3.1.8) should provide a more complete description of the process for revocation of certification of a Certificate of Compliance for a meter. <i>TANC.</i>	<i>TANC I</i> Appendix A at 9.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
140.	The powers and authority of the ISO (as discussed in the MP) in the event of a party's failure to comply with the ISO's audit or test procedures should set forth in the MP to ensure the consistency of application. <i>TANC.</i>	<i>TANC I</i> Appendix A at 9.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
141.	Section 6.1.2 of the MP imposes tight deadlines for meter repair, but it does not specify what action the ISO intends to take in the event repairs are not completed by the deadlines. <i>TANC.</i>	<i>TANC I</i> Appendix A at 9.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
142.	Section 9.1.2 of the MP, giving the ISO control over metered entities' rights to grant access to meter data, appears overly restrictive. <i>TANC.</i>	<i>TANC I</i> Appendix A at 9.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
143.	The ISO should publish its proposed guidelines for granting exemptions from metering requirements (section 13.2(a) of the MP) as soon as possible. <i>TANC.</i>	<i>TANC I</i> Appendix A at 9.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
144.	The term "Direct Access" in the SCAP is not defined. <i>TANC.</i>	<i>TANC I</i> Appendix A at 10.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
145.	The grounds for ISO rejection of an SC application should be limited to noncompliance with material requirements. Section 3.1(b) of the SCAP should be modified. <i>TANC.</i>	<i>TANC I</i> Appendix A at 10.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
146.	The SCAP should specify the time for signing the SC Agreement. <i>TANC.</i>	<i>TANC I</i> Appendix A at 10.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
147.	The ISO must provide the form of its proposed software licensing agreement in section 5.1(b) of the SCAP. <i>TANC.</i>	<i>TANC I</i> Appendix A at 10.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
148.	The potential requirement for software for the purpose of Validating, Estimating and Editing meter values must be explained in the SCAP sections 5.1(c) and 1.2.2. <i>TANC.</i>	<i>TANC I</i> Appendix A at 10.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
149.	<p>The requirement of "LAN" service for "EDI" must be explained in the SCAP in explicit detail, including identification of the LAN service intended and the EDI requirements anticipated. Also, the cost of that requirement should be provided.</p> <p>TANC.</p>	TANC I Appendix A at 10.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
150.	<p>Section 7.2 of the SCAP should specify the results of termination or suspension of SC scheduling rights or rejection of SC schedules.</p> <p>TANC.</p>	TANC I Appendix A at 10.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
151.	<p>The Application in the SCAP should make clear what form of certification by a rating agency is acceptable to the ISO. The Application should also clarify the requirement of the "executed letter of understanding for payment."</p> <p>TANC.</p>	TANC I Appendix A at 10.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
152.	<p>The Application requirement of an Electronic Funds Transfer Account should be specified in more detail in the SCAP.</p> <p>TANC.</p>	TANC I Appendix A at 10.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
153.	The Application (in the SCAP) should make clear what form of confirmation of Scheduling Coordinator authority will be acceptable. <i>TANC.</i>	<i>TANC I</i> Appendix A at 11.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
154.	The Application in the SCAP should place limits on the "further information" that an Applicant may be required to provide the ISO. <i>TANC.</i>	<i>TANC I</i> Appendix A at 11.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
155.	Section 5.1.4 of the Tariff specifies that the exemption for Generating Units of less than 10 MW is available only to those units selling their total output to a UDC or to customers connected to the UDC's system. Sections 1.3.2, 2.1 and 4.4.1 of the OCP should be modified. <i>TANC.</i>	<i>TANC I</i> Appendix A at 12.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
156.	<p>The references (sections 4.3.5, 4.4.6, 5.6 and 5.9 of the OCP) to the ISO's "security standards, security concerns," and ability to withhold Final Approval of an Outage for reasons of "security or system status of the ISO Grid" should be clarified to specify what circumstances those references anticipate.</p> <p>TANC.</p>	TANC I Appendix A at 12.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
157.	<p>Sections 7.3 and 7.4 of the OCP regarding the ISO's communications to Operators or Participating Generators should be clarified as to what forms of communications are acceptable. It does not seem to be necessary that the ISO communicate in the same form as communications that it may receive.</p> <p>TANC.</p>	TANC I Appendix A at 12.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
158.	<p>Section 2.1 of the DFP should make clear that SC demand forecasts are not intended to be binding commitments or obligations.</p> <p>TANC.</p>	TANC I Appendix A at 13.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
159.	<p>Section 2.1 of the SABP should not attempt to establish matters of “prima facie proof” in advance for purposes of dispute resolution.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 14.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
160.	<p>Section 2.2.6 of the SABP does not seem necessary. It is not necessary for the ISO to “reasonably accept” a bank that meets the stated standards.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 14.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
161.	<p>Section 4.4.2 of the SABP and the time for notifying the ISO of a billing dispute and the process for disputes should not require the submittal of “all available evidence” with the notification. Such evidence can be provided in the ISO's ADR process.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 14.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
162.	<p>Section 6.10.3 of the SABP should provide more direct notice to, and recourse for, customers of defaulting SCs than posting of a notice on the ISO Home Page.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 14.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
163.	<p>Appendix A (section 3.2) of the SABP should refer to the ISO's FERC rate filing in the specification of the volume of transactions on which an SC's GMC will be calculated.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 14.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
164.	<p>Section 1.3.1 of the MMIP should apply to the PX as well as other participants.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 15.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
165.	<p>Section 2.2.1 of the MMIP should identify more clearly the issues that have been raised regarding short-term horizontal market power during the transition phase.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 15.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
166.	<p>Section 3.3.5 of the MMIP should require that an investigation be conducted when a complaint is received.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 15.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>
167.	<p>Section 4.1. of the MMIP should specify early dates for commencement of the functions of the ISO Market Surveillance Unit.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix A at 15.</p>	<p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,471.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
168.	<p>Section 5 of the MMIP should make some provisions for some staff to support the activities of the 3 members of the Market Surveillance Committee.</p> <p><i>TANC.</i></p>	<i>TANC I</i> Appendix A at 15.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
169.	<p>Section 6 of the MMIP should provide for a comprehensive scope of review by the ISO Market Surveillance Committee, rather than the narrow scope of functions specified. Moreover, the MMIP should allow for the Committee to present information directly to FERC.</p> <p><i>TANC.</i></p>	<i>TANC I</i> Appendix A at 15.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
170.	<p>Section 8.2 of the MMIP should include provisions for the publication of quantities associated with transactions.</p> <p><i>TANC.</i></p>	<i>TANC I</i> Appendix A at 15.	The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.	81 FERC at 62,471.
171.	<p>Section 2.4.4.4.4.5 of the Tariff is inconsistent with Section 2.4.4.4.4.3.</p> <p><i>TANC.</i></p>	<i>TANC I</i> at 33.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
172.	<p>Amendment to Section 2.4.4.4.5 of the Tariff suggests that the holder of Existing Rights under an Existing Contract may be subject "to the relevant ISO Tariff," presumably of the PTO which is a party to the Existing Contract. Until and unless a party to an Existing Contract converts its rights and becomes a PTO, the TO Tariff will not be applicable to that party.</p> <p><i>TANC.</i></p>	<i>TANC I</i> at 33-34.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
173.	<p>The purpose behind the amendment to Section 2.2.10.8 of the Tariff seems antithetical to the ISO's market approach.</p> <p><i>TANC.</i></p>	<i>TANC I</i> Appendix B at 2.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
174.	<p>Amendment to Section 2.2.4.7 does not state who provides the SC services after termination of an SC.</p> <p><i>TANC.</i></p>	<i>TANC I</i> Appendix B at 2.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
175.	<p>Section 7.4.1 of the Tariff: The ISO cannot initially provide losses, so section 7.4.1 should add ISO undertaking to provide all Ancillary Services as soon as possible.</p> <p><i>TANC.</i></p>	<i>TANC I</i> Appendix B at 2.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
176.	<p>Use of "metered consumption" rather than "metered Demand" (section 8.3) is improper.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix B at 2.</p>	<p>All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.</p>	<p>81 FERC at 62,476.</p>
177.	<p>The deletion of language in Section 11.4.3(g) of the Tariff deletes a crucial item of information.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix B at 3.</p>	<p>All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.</p>	<p>81 FERC at 62,476.</p>
178.	<p>The short review period should not affect an SC's rights to challenge improper billing after the conclusion of the billing period. Sections 11.6.1.2 and 11.7.2 should be revised.</p> <p><i>TANC.</i></p>	<p><i>TANC I</i> Appendix B at 3.</p>	<p>All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.</p>	<p>81 FERC at 62,476.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
179.	<p>ISO protocols are inconsistent with ISO Tariff, contains ambiguous terms, and reflect errors that should be corrected. Suggested changes to Protocols contained in Appendix A.</p> <p><i>Comments and Protest of the Metropolitan Water District of Southern California to the October 31, 1997 Compliance Filings of the California Independent Operator System Corporation and California Power Exchange Corporation, Docket Nos. EC96-19-006, et al., filed November 21, 1997 ("Metropolitan I").</i></p>	<i>Metropolitan I</i> Executive Summary.	<p>All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.</p> <p>The Commission will require the ISO to file their complete Protocols within 60 days of the ISO Operations Date. At that time we will afford the parties an opportunity to file comments.</p>	<p>81 FERC at 62,476.</p> <p>81 FERC at 62,471.</p>
180.	<p>Proposed access to Meter Data Acquisition System (MDAS) is unclear. Many equally credible interpretations can be made in Revised Staging Plan No. 1 in regards to the access to the MDAS.</p> <p><i>Motion to Intervene, Protest and Comments and Motion for Clarification of the Bonneville Power Administration Regarding the California Independent System Operator Corporation and California Power Exchange Corporation Proposed Tariff Amendments Filed November 21, 1997, Docket Nos. EC96-19-010, et al., filed December 10, 1997 ("BPA II").</i></p>	<i>BPA II</i> at 4-5.	<p>All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.</p>	81 FERC at 62,476.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
181.	<p>Amendment to the definition of "Congestion" to include "real time" conditions is problematic. First, the change appears to be permanent although no reason is given for it. To the extent that the algorithm unintentionally drives a change in the Tariff that may not be desirable, what steps are being taken to correct it? Second, it is not clear how the real time Congestion management will be implemented. Third, no indication is given as to how real time inter-zonal Congestion would be managed, if at all. And fourth, it is not clear that the ISO does not intend to manage Congestion at tie points in real time.</p> <p><i>BPA.</i></p>	<i>BPA II at 8-11.</i>	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.
182.	<p>The ISO's proposed amendments to Ancillary Services Bid Evaluation discriminate against parties importing Ancillary Services into the ISO Control Area.</p> <p><i>BPA.</i></p>	<i>BPA II at 11-12.</i>	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
183.	<p>Several of the MSS provisions of the ISO Tariff require clarification, including whether a utility can sell Ancillary Services as a System Unit if it is operating under its Interconnection Agreement and the meaning of "self provide" in section 2.5.20.3.</p> <p><i>Turlock.</i></p>	<i>Turlock II at 6-8.</i>	In light of the numerous comments the Commission has received to date on this issue, the Commission finds that there are many issues still unresolved with regards to the Metered Subsystem concept and the related agreements. Therefore, we will address issues related to the Metered Subsystem concept when the ISO completes its Metered Subsystem proposal.	81 FERC at 62,477.
184.	<p>Sections 2.5.20.5.1, 2.5.24, 2.5.8 and 2.2.3.3 of the Tariff pertaining to the MSS require clarification.</p> <p><i>Turlock.</i></p>	<i>Turlock II at 8-10.</i>	In light of the numerous comments the Commission has received to date on this issue, the Commission finds that there are many issues still unresolved with regards to the Metered Subsystem concept and the related agreements. Therefore, we will address issues related to the Metered Subsystem concept when the ISO completes its Metered Subsystem proposal.	81 FERC at 62,477.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
185.	<p>In changes proposed in the ISO's November 21, 1997 tariff amendments, the ISO is proposing new definitions that may or may not be consistent with the August 15 revisions that made DWR eligible for MSS status.</p> <p><i>Protest and Request for Further Procedures of the California Department of Water Resources ("DWR"), Docket Nos. EC96-19-010 and ER96-1663-011, filed December 4, 1997 ("DWR I").</i></p>	<i>DWR I</i> at 3.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,477.
186.	<p>Changes proposed in the ISO's November 21, 1997 tariff amendments eliminate competitive provisions of Ancillary Services to the ISO, revise Settlement and Billing provisions to, among other things, reduce the amount of information provided in Preliminary Settlement Statements and the amount of time Market Participants have to review them, apply a within-Zone approach to Ancillary Services obligations and charges, and revise provisions affecting Existing Contracts.</p> <p><i>DWR.</i></p>	<i>DWR I</i> at 4.	All issues raised by these filings, including but not limited to issues regarding Tariff amendments not addressed in this order, will be the subject of a future order.	81 FERC at 62,476.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
187.	<p>Tariff Amendment No. 4: The definition of terms for actual imports and actual exports in the calculation of Imbalance Energy is unclear.</p> <p><i>Motion to Intervene and Comments of The Bonneville Power Administration Regarding The California Independent System Operator Corporation's Proposed Tariff Amendment No. 4 Filed March 3, 1998, Docket Nos. EC96-19-017 and ER96-1663-018, filed March 16, 1998, ("BPA III").</i></p>	<i>BPA III</i> at 3-5.	A full understanding of issues related to the ISO Tariff will not be known until after the commencement of service. The Amendment is conditionally accepted subject to certain conditions and modifications, but issues not addressed will be the subject of a future order.	82 FERC ¶ 61,327, at 62,294 (March 30, 1998).
188.	<p>Tariff Amendment No. 4: The treatment of wheel-through transactions is ambiguous; ISO should clarify its practices with regard to certain curtailment situations.</p> <p><i>BPA.</i></p>	<i>BPA III</i> at 5-7.	A full understanding of issues related to the ISO Tariff will not be known until after the commencement of service. The Amendment is conditionally accepted subject to certain conditions and modifications but issues not addressed will be the subject of a future order.	82 FERC at 62,294.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
189.	<p>Tariff Amendment No. 4: Protest to Amendment to the extent that it is designed to permanently preclude entities from providing Black Start and Voltage Support Services to the ISO Grid.</p> <p><i>Protest of the California Department of Water Resources, Docket Nos. EC96-19-017 and ER96-1663-018, filed March 16, 1998 ("DWR II").</i></p> <p>Protest and Comments on Amendment No. 4 to the ISO Operating Agreement and Tariff and Protocols of The Metropolitan Water District of Southern California, Docket Nos. EC96-19-017 and ER96-1663-018, filed March 16, 1998 ("Metropolitan II").</p>	<p><i>DWR II at 2-5.</i></p> <p><i>Metropolitan II at 9.</i></p>	<p>A full understanding of issues related to the ISO Tariff will not be known until after the commencement of service. The Amendment is conditionally accepted subject to certain conditions and modifications but issues not addressed will be the subject of a future order.</p>	82 FERC at 62,294.
190.	<p>Tariff Amendment No. 4: Opposes elimination of capacity payments for Black Start Generators.</p> <p><i>DWR.</i></p>	<i>DWR II at 5.</i>	<p>A full understanding of issues related to the ISO Tariff will not be known until after the commencement of service. The Amendment is conditionally accepted subject to certain conditions and modifications, but issues not addressed will be the subject of a future order.</p>	82 FERC at 62,294.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
191.	<p>Tariff Amendment No. 4: The proposal to resolve mismatches in the scheduled quantity or location of Inter-Scheduling Coordinator Trades has the effect of decreasing the incentive for submission of balanced trade. The ISO should furnish additional information on the impact of this proposal on Scheduling Coordinators.</p> <p><i>Metropolitan.</i></p>	<i>Metropolitan II at 5-6.</i>	A full understanding of issues related to the ISO Tariff will not be known until after the commencement of service. The Amendment is conditionally accepted subject to certain conditions and modifications, but issues not addressed will be the subject of a future order.	82 FERC at 62,294.
192.	<p>Tariff Amendment No. 4: Concerning Wheeling Access Charge, objects to ISO posting amendments of filed rates or rate schedules on the ISO Home Page. The effectiveness of rates that are accepted subject to FPA should be determined by reference to rate schedules on file with FERC rather than by notice on private web site.</p> <p><i>Metropolitan.</i></p>	<i>Metropolitan II at 8-9.</i>	A full understanding of issues related to the ISO Tariff will not be known until after the commencement of service. The Amendment is conditionally accepted subject to certain conditions and modifications, but issues not addressed will be the subject of a future order.	82 FERC at 62,294.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
193.	<p>Tariff Amendment No. 5: the proposal leaves unanswered the potential impacts for the interrelationship of the ISO's proposal with other amendments and provisions of the ISO, particularly the impact on the Imbalance Energy market.</p> <p><i>Comments on Amendment No. 5 to the ISO Tariff of the Metropolitan Water District of Southern California, Docket Nos. EC96-19-018 and ER96-1663-019, filed March 16, 1998 ("Metropolitan III").</i></p> <p>Protest and Comments on Amendment No. 5 to the ISO Tariff of the Transmission Agency of Northern California, Docket Nos. EC96-19-018 and ER96-1663-019, filed March 16, 1998 ("TANC II").</p>	<p><i>Metropolitan III</i> at 4-5.</p> <p><i>TANC II</i> at 4.</p>	<p>A full understanding of issues related to the ISO Tariff will not be known until after the commencement of service. The Amendment is conditionally accepted subject to certain conditions and modifications, but issues not addressed will be the subject of a future order.</p>	82 FERC at 62,294.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
194.	<p>Tariff Amendment No. 5: ISO has not explained whether the Imbalance Energy Market will be sufficiently robust to accommodate the variances permitted by Amendment No. 5 between schedules and real time operations. The impact on Congestion Management in the Day-Ahead and Hour-Ahead markets is not considered and the potential for greater reliance on real time Congestion Management is not explained.</p> <p><i>TANC.</i></p>	<i>TANC II</i> at 5.	A full understanding of issues related to the ISO Tariff will not be known until after the commencement of service. The Amendment is conditionally accepted subject to certain conditions and modifications, but issues not addressed will be the subject of a future order.	82 FERC at 62,294.
195.	<p>Tariff Amendment No. 6: Correction to bill calculations procedure is not clear on how charges would be applied to transactions covered under existing contracts; the adjustments would result in unjust and unreasonable charges to Scheduling Coordinators.</p> <p>Motion to Intervene and Protest by the Western Area Power Administration, Docket Nos. EC96-19-021 and ER96-1663-022, filed April 7, 1998 ("WAPA").</p>	<i>WAPA</i> at 4-6.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications, and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
196.	<p>Tariff Amendment No. 6: The ISO has not justified its proposed temporary change to the Real-Time Market for Imbalance Energy, and the proposed changes to the Imbalance Energy pricing mechanism raise significant concerns. If accepted, the definitions of "BEEP Interval Ex Post prices" and "Uninstructed Imbalance Energy" require clarification.</p> <p>Protest to Amendment No. 6 to the ISO Operating Agreement and Tariff and Protocols and Request for Suspension and Hearing of the Metropolitan Water District of Southern California, Docket Nos. EC96-19-021 and ER96-1663-022, filed April 9, 1998 ("Metropolitan IV").</p>	<i>Metropolitan IV</i> at 7, 10-11.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications, and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
197.	<p>Tariff Amendment No. 6: New section 24 regarding physical restraints on schedules proposed by the ISO should be a permanent provision.</p> <p><i>Metropolitan.</i></p>	<i>Metropolitan IV</i> at 11.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications, and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
198.	<p>Tariff Amendment No. 6: the proposed changes regarding Overgeneration Management are inconsistent with prior orders and are discriminatory.</p> <p><i>Numerous intervenors in Docket Nos. EC96-19-021 and ER96-1663-022 (each filed April 9, 1998), including:</i></p> <p><i>Motion to Intervene and Protest of Enron Power Marketing, Inc. ("Enron II");</i></p> <p><i>Protest, Motion to Reject, In Part, and Request for Hearing of the Transmission Agency of Northern California ("TANC III");</i></p> <p><i>Protest of the California Department of Water Resources to Amendment 6 ("DWR III"); and</i></p> <p><i>Motion to Intervene of Turlock Irrigation District ("Turlock III").</i></p>	<p><i>Metropolitan IV at 12-15, Enron II at 10-11, TANC III at 3-5, DWR III at 2-3, Turlock III at 3.</i></p>	<p>Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.</p>	<p>82 FERC at 62,292-95.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
199.	<p>Tariff Amendment No. 6: The proposed changes to give load an implicit priority in congestion management violate the terms of existing contracts, are inconsistent with FERC orders and must be rejected.</p> <p><i>Motion to Reject, In Part, Protest and Request for Hearing Regarding Amendment No. 6 to the ISO Operating Agreement and Tariff Submitted on Behalf of the Cities of Redding and Santa Clara, California, and the M-S-R Public Power Agency, Docket Nos. EC96-19-021 and ER96-1663-022, filed April 9, 1998 ("Cities").</i></p>	<p><i>Metropolitan IV at 16, TANC III at 5-6, Cities at 7.</i></p>	<p>Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.</p>	<p>82 FERC at 62,292-95.</p>
200.	<p>Amendment No. 6: Clarification required of Default Usage Charge ("DUC") "day-prior notice" language.</p> <p><i>Metropolitan.</i></p>	<p><i>Metropolitan IV at 16.</i></p>	<p>Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.</p>	<p>82 FERC at 62,292-95.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
201.	<p>Tariff Amendment No. 6: ISO has not adequately explained proposed revisions to Appendices B and H to the Settlement and Billing Protocol.</p> <p><i>Metropolitan.</i></p>	<p><i>Metropolitan IV at 17.</i></p>	<p>Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.</p>	<p>82 FERC at 62,292-95.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
202.	<p>Tariff Amendment No. 6: ISO must clearly state the procedures and the priority of those procedures it will use in an effort to avoid aborting the Day-Ahead Market.</p> <p><i>Interventions in Docket Nos. EC96-16-021 and ER96-1663-022 (each filed April 9, 1998), including:</i></p> <p><i>Protest on Behalf of the Cities of Anaheim, Colton, and Riverside, California and the Cities of Azusa and Banning, California ("Southern Cities II");</i></p> <p><i>Notice of Intervention and Comments of the Public Utilities Commission of the State of California ("CPUC"); and</i></p> <p><i>Motion to Intervene and Comments of The Bonneville Power Administration Regarding The California Independent System Operator Corporation's Proposed Tariff Amendment No. 6 Filed March 23, 1998 ("BPA IV").</i></p>	<p><i>Metropolitan IV at 18, Southern Cities II at 4-5, CPUC at 6-7, TANC III at 7, BPA IV at 4-6.</i></p>	<p>Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.</p>	<p>82 FERC at 62,292-95.</p>

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
203.	<p>Tariff Amendment No. 6: ISO should clarify that it will make available information on the amounts flowing through the Neutrality Adjustment and when it proposes to make such information available.</p> <p><i>Motion to Intervene and Protest of Electric Clearinghouse, Inc., Docket Nos. EC96-19-021 and ER96-1663-022, filed April 9, 1998 ("ECI II").</i></p>	<i>ECI II</i> at 5.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
204.	<p>Tariff Amendment No. 6: Once sufficient data is gathered, the ISO should include the Neutrality Adjustment in the form of a stated rate under the ISO Tariff.</p> <p><i>ECI.</i></p>	<i>ECI II</i> at 6.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
205.	<p>Tariff Amendment No. 6: The proposed DUC requires more explanation regarding how the ISO will operate the Usage Charge plan and set the applicable floor and ceiling of the DUC.</p> <p><i>Motion to Intervene of Houston Industries Power Generation, Inc., Docket Nos. EC96-19-021 and ER96-1663-022, filed April 9, 1998 ("HIPG").</i></p>	<i>HIPG</i> at 6, <i>CPUC</i> at 6.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
206.	<p>Tariff Amendment No. 6: The Overgeneration proposal does not comply with FERC's October 30 directive that Scheduling Coordinators address their own Overgeneration problems.</p> <p>Protest by the Sacramento Municipal Utility District to Amendment No. 6 of the ISO Operating Agreement and Tariff, Docket Nos. EC96-19-021 and ER96-1663-022, filed April 9, 1998, ("SMUD II").</p>	SMUD II at 3.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
207.	<p>Tariff Amendment No. 6: ISO should clarify the role of Supplemental Energy bids in its real-time Overgeneration Management.</p> <p>Motion to Intervene and Comment of Los Angeles Department of Water and Power on California Independent System Operator Corporation's March 23, 1998 Filing (Amendment No. 6), Docket Nos. EC96-19-021 and ER96-1663-022, filed April 9, 1998 ("LADWP").</p>	LADWP at 3.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
208.	<p>Amendment No. 6: FERC urged to establish cap on the Neutrality Adjustment that can be collected through SABP 3.1.1 and require ISO to file any proposal to collect in excess of limits.</p> <p><i>Southern Cities.</i></p>	<i>Southern Cities II</i> at 5-7.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
209.	<p>Tariff Amendment No. 6: The DUC proposal is unreasonable and will not address the PX's gaming problems.</p> <p><i>Enron, DWR.</i></p>	<i>Enron II</i> at 5-6, <i>DWR III</i> at 4.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
210.	<p>Tariff Amendment No. 6: The DUC proposal is discriminatory against non-incumbent users of the ISO Grid, which do not have the ability to submit Adjustment Bids.</p> <p><i>Enron.</i></p>	<i>Enron II</i> at 7.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
211.	<p>Tariff Amendment No. 6: The DUC proposal is inconsistent with the agreed-on policy that Scheduling Coordinators seeking to use the ISO's grid for bilateral transactions outside the PX should not be mandated to submit adjustment bids.</p> <p><i>Enron.</i></p>	<i>Enron II at 3.</i>	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
212.	<p>Tariff Amendment No. 6: Sections 2.3.4.2 and 2.3.4.3 should be modified to establish that both Scheduling Coordinators and adjacent Control Areas will be offered the identical ability to purchase energy at negative prices prior to ISO taking action under Section 2.3.4.4.</p> <p><i>Enron.</i></p>	<i>Enron II at 11.</i>	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
213.	<p>Tariff Amendment No. 6: ISO should submit proposed procedures for selecting which resources will be the target of mandatory schedule reductions under Section 2.3.4.5.</p> <p><i>Enron.</i></p>	<i>Enron II at 11-12.</i>	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
214.	<p>Tariff Amendment No. 6: Further clarification is required on the justification for paying Instructed Units the highest incremental energy price upon ISO dispatch of the Units to supply the Real-Time Imbalance Market.</p> <p><i>CPUC.</i></p>	<i>CPUC</i> at 6.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
215.	<p>Tariff Amendment No. 6: Clarification required regarding the pricing structure for Supplemental Energy and energy supplied by Ancillary Services.</p> <p><i>CPUC.</i></p>	<i>CPUC</i> at 6.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
216.	<p>Tariff Amendment No. 6: Issues related to Congestion Management remain unclear.</p> <p><i>CPUC.</i></p>	<i>CPUC</i> at 6.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
217.	<p>Tariff Amendment No. 6: Proposed changes to the pricing mechanism for Imbalance Energy require clarification, including the definition of Uninstructed Imbalance Energy.</p> <p><i>TANC.</i></p>	<i>TANC III</i> at 3.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
218.	<p>Tariff Amendment No. 6: Proposed changes to Settlement and Billing Protocol, Appendix C, section C.2.2.3 of relating to Replacement Reserve capacity Charges is inconsistent with cost causation and self-provision concepts.</p> <p><i>TANC.</i></p>	<i>TANC III</i> at 7.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
219.	<p>Tariff Amendment No. 6: Section 11.2.4.2 proposed change to avoid System Emergencies violates WSCC practices and procedures as they relate to imports, and the term "imports" should be struck.</p> <p><i>BPA.</i></p>	<i>BPA IV</i> at 3.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.

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220.	<p>Tariff Amendment No. 6: Staging Plan 3 submitted on April 6, 1998 does not provide the expected duration of temporary amendments.</p> <p><i>DWR.</i></p>	<i>DWR III at 2.</i>	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,29295.
221.	<p>Tariff Amendment No. 6: The latitude in use of a neutrality adjustment should only be a temporary aspect of ISO operation.</p> <p><i>DWR.</i></p>	<i>DWR III at 6.</i>	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,29295.
222.	<p>Tariff Amendment No. 6: Guidelines to assure reasonable results for BEEP should be proposed including audit procedures.</p> <p><i>Motion to Intervene and Limited Protest of Pacific Gas and Electric Company to Amendment No. 6 to the ISO Operating Agreement and Tariff, Docket Nos. EC96-19-021 and ER96-1663-022, filed April 9, 1998, ("PG&E").</i></p>	<i>PG&E at 4.</i>	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
223.	<p>Tariff Amendment No. 6: The consideration of Supplemental Energy and Ancillary Services bids should undergo stakeholder review after commencement of ISO operations.</p> <p><i>PG&E.</i></p>	<i>PG&E</i> at 5-6.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
224.	<p>Tariff Amendment No. 6: ISO should expedite development of improved electronic transfers of Dispatch instructions to ensure more accurate dispatching instructions; the dispatch instructions should indicate whether the instruction is an emergency or out of market instruction.</p> <p><i>PG&E.</i></p>	<i>PG&E</i> at 7.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.

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225.	<p>Tariff Amendment No. 6: When ISO does call on a Generating Unit, either directly or through SC, for Imbalance Energy or other resources support necessary to meet the ISO's real time requirements, the Settlement for Instructed Imbalance Energy, Tariff section 11.2.4.1.1, should apply rather than the Net Settlements for Uninstructed Imbalance Energy, Tariff section 11.2.4.1.</p> <p><i>PG&E.</i></p>	<i>PG&E</i> at 8.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
226.	<p>Tariff Amendment No. 6: There needs to be close coordination between the ISO, PX and other SCs on changes affecting settlements and billing to assure that all necessary information to complete and review settlements is available, and that adequate lead time to make necessary program changes is provided after changes and FERC orders.</p> <p><i>PG&E.</i></p>	<i>PG&E</i> at 8-9.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
227.	<p>Tariff Amendment No. 6: Settlement and Billing Protocol Appendix H term "SCPUOT" needs clarification.</p> <p><i>PG&E.</i></p>	<i>PG&E</i> at 11.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
228.	<p>Tariff Amendment No. 6: Commission should confirm that the ISO has control over Generating Units which are not associated with the ISO Controlled Grid or are not operated by an ISO participant only to the extent that such non-participants' contracts or other arrangements allow the ISO to assert such control in a System Emergency.</p> <p><i>Cities.</i></p>	<i>Cities</i> at 5.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications , and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.

	ISSUE and INTERVENOR	ISSUE PAGE CITE	FERC COMMENT	FERC COMMENT CITE
229.	<p>Tariff Amendment No. 6: ISO has not adequately justified its proposed modification to the neutrality adjustment.</p> <p><i>Cities.</i></p>	<i>Cities</i> at 8.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.
230.	<p>Tariff Amendment No. 6: ISO proposal in transmittal letter that in certain conditions it will attempt to eliminate Overgeneration by exports of Energy to one or more adjoining Control Areas at no cost or negative price should also be extended to within the ISO Control Area.</p> <p><i>Turlock.</i></p>	<i>Turlock III</i> at 3-4.	Commission conditionally accepts Amendment No. 6 for filing, subject to certain conditions and modifications and subject to further Commission orders. The notice period in the Dockets for Amendment No. 6 had not yet been closed at the time of this order. Commission will address substantive issues raised by intervenors in a future order.	82 FERC at 62,292-95.