

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

**Southern California Edison Co., et al. ) Docket Nos. ER98-441-000, et al.**

**ANSWER IN OPPOSITION TO REQUEST FOR  
SHORTENED ANSWER PERIOD**

To: The Honorable Curtis L. Wagner, Jr.  
Chief Administrative Law Judge

Pursuant to Rule 213 of the Commission's rules of Practice and Procedure, 18 C.F.R. § 385.213 (1999), the California Independent System Operator Corporation ("California ISO") files its partial answer in opposition to the Motion to Sever and Request for Shortened Answer Period filed on September 23, 1999, by Southern Energy Delta, Southern Energy Potrero, Cabrillo Power I and II, Duke Energy Moss Landing, Duke Energy Oakland and Duke Energy South Bay ( collectively referred to as "Owners"). The Owners request a response in three days or September 27. The California ISO was not aware that the motion was filed requesting a shortened response period until approximately 2:15p.m. today, September 24. The California ISO has not received a service copy.

The California ISO objects to shortening the time for a response. The Owners have requested an answer by Monday. This is prejudicial to the California ISO. Moreover, there is no reason for shortening the time period. As Your Honor is aware, the subject matter of this motion was debated at some length in a recent pre-hearing conference. After listening to the parties, Your Honor invited the motion, presumably so that the parties could frame their arguments as well as possible and Your Honor could give deliberate consideration to the motion and the opposition to it. There can be no deliberate consideration unless the members of the Buyers Coalition have adequate time

to respond to the motion. There is no reason whatsoever to rush as movants are requesting; indeed, the reasons given by the movants are without substance.

The California ISO respectfully requests that the motion to shorten the answer period be denied.

Respectfully submitted,

J. Phillip Jordan  
Counsel for California Independent System  
Operator Corporation

September 24, 1999  
Washington, DC

**CERTIFICATE OF SERVICE**

I hereby certify I have this day served the foregoing document upon the Secretary of the Federal Energy Regulatory Commission and upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, DC, this 24th day of September, 1999.

Holli A. Cole