

**BEFORE PUBLIC UTILITIES COMMISSION**  
**OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking into the operation )  
of interruptible load programs offered by ) R.00-10-002  
Pacific Gas and Electric Company, San Diego )  
Gas & Electric Company, and Southern )  
California Edison Company and the effect of )  
these programs on energy prices, other demand )  
responsiveness programs, and the reliability of )  
electric system. )  
\_\_\_\_\_ )

**COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
CORPORATION ON THE INTERIM OPINION ON ROLLING BLACKOUT  
REDUCTION PROGRAM**

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Attorneys for the  
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Corporation**

Dated: June 5, 2001

In connection with the Draft Decision of Commissioner Wood in Rulemaking 00-10-002, the California Independent System Operator Corporation submits the following comment:

The California Independent System Operator Corporation requests that the final decision in this proceeding require, as a condition to participating in the Rolling Blackout Reduction Program, that all participants in the program disconnect their load from the Controlled Grid when using their back up generators. The California Independent System Operator Corporation requests this requirement because any attempt to operate back up generators in parallel with the Controlled Grid system could pose a significant reliability risk.

Dated: June 5, 2001

Respectfully submitted,

**FARELLA BRAUN & MARTEL LLP**

By: \_\_\_\_\_  
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DECLARATION OF SERVICE

I, Gabriel A. Mikulich, declare that I am employed in the County of San Francisco, State of California, and am not a party to the within action. My business address is Russ Building, 235 Montgomery Street, San Francisco, CA 94104.

On May 18, 2001, I served the document titled **COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION ON THE INTERIM OPINION ON ROLLING BLACKOUT REDUCTION PROGRAM** on all parties of record in Rulemaking 001-10-002 by both mailing a properly addressed copy by first class mail with postage prepaid to each party and providing an electronic copy to the email address of record for each party.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed at San Francisco, California this 5th day of June, 2001.

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Gabriel A. Mikulich