

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

Order Instituting Rulemaking to Integrate and
Refine Procurement Policies and Consider
Long-Term Procurement Plans.

Rulemaking 10-05-006

**RESPONSE OF THE CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION TO THE MOTION
OF THE DIVISION OF RATEPAYER ADVOCATES
REGARDING THE TRACK 1 SCHEDULE**

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Corporation

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On June 3, 2011 the Division of Ratepayer Advocates (DRA) filed a motion that proposes several schedule modifications to the Track 1 system procurement schedule. Specifically, DRA seeks an additional two weeks between the July 1 submission of IOU and ISO study results and testimony, and the due date for responsive testimony filed by other parties. In the alternative, if the additional two weeks are not provided for testimony preparation, DRA requests: 1) that the IOUs be required file any portions of system Track 1 testimony not affected by the ISO model changes by June 17, 2011; and 2) that both the IOUs and the ISO be required to respond to discovery requests about the final study results and testimony within four working days (DRA motion, 4).

The ISO supports an extension of time for the DRA and other parties to submit responsive testimony. The ISO and IOU joint motion for an additional four weeks to complete modeling changes and develop supporting testimony was never intended to cause a hardship on other parties with respect to their own case preparation. Although the ISO has provided parties with access to input assumptions and other modeling data as the studies have been developed, a three week period for testimony preparation involving complex technical issues is a relatively short period of time.

The ISO does have concerns with the DRA's alternative request to shorten the discovery response period to four working days. Although the ISO prefers a much less formal process for responding to questions about its studies, and has suggested that a workshop be held shortly after the testimony has been submitted, it is possible that there also will be data requests to which the ISO must respond. Completing responses to data requests within four working days places an undue burden on limited ISO resources that are fully engaged in other modeling and study efforts connected with the ISO's 2011/2012 transmission planning process and other initiatives. Furthermore, the ISO will continue to make every effort to post all data inputs and assumptions on the ISO website and provide notice of these postings to the parties in this case. The ISO will also informally respond to questions. For these reasons, the ISO urges the Commission to reject a requirement that the ISO respond to formal data requests in a shortened period of time.

Respectfully submitted,

By: /s/ Judith B. Sanders

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June 8, 2011

CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2011, I served, by electronic and United States mail, a copy of the foregoing *Response Of The California Independent System Operator Corporation To The Motion Of The Division of Ratepayer Advocates Regarding The Track 1 Schedule* to each party in Docket No. R.10-05-006.

Executed on June 8, 2011
at Folsom, California

/s/ Anna M. Pascuzzo

Anna M. Pascuzzo
An Employee of the California
Independent System Operator