

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

California Independent System Operator Corporation))	Docket Nos.	ER04-445-005
)		ER04-445-006
)		ER04-445-007
)		ER04-445-008
)		ER04-445-009
Pacific Gas and Electric Company)	Docket Nos.	ER04-443-004
)		ER04-443-005
)		ER04-443-006
)		ER04-443-007
San Diego & Electric Company)	Docket Nos.	ER04-441-004
)		ER04-441-005
)		ER04-441-006
)		ER04-441-007
Southern California Edison Company)	Docket Nos.	ER04-435-007
)		ER04-435-008
)		ER04-435-009
)		ER04-435-011
Interconnection for Wind Energy)	Docket No.	RM05-4-000
Standardization of Generator Interconnection Agreements and Procedures)	Docket No.	RM02-1-006
)		(Not Consolidated)

**ANSWER OF THE CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION TO THE CALIFORNIA
PARTIES' MOTION TO POSTPONE PORTION OF
COMPLIANCE FILING**

Pursuant to Rule 213 of the Federal Energy Regulatory Commission (FERC or Commission) Rules of Practice and Procedure, 18 C.F.R. § 385.213 (2004), the California Independent System Operator Corporation (CAISO) hereby files this answer

in qualified support of the Motion to Postpone Portion of Compliance Filing filed by the California Parties¹ in this proceeding (Motion).

The Motion arises in response to the Commission's "Order Accepting in Part and Rejecting in Part Order Nos. 2003, 2003-A, and 2003-B Compliance Filings, issued July 1, 2005 (112 FERC ¶ 61,009 (2005) (July 1 Order), which, among other things, directed the CAISO to adopt a centralized process for conducting interconnection studies. (July 1 Order at ¶ 55-57.) The July 1 Order required that the CAISO and California Parties submit compliance filings, including a proposed centralized study process, within 60 days of the order's issuance or by August 30, 2005.

The California Parties request in the Motion that the Commission "allow the CAISO a minimum of six months to conduct a stakeholder process, and develop a detailed, consensus proposal for any further centralizing of the interconnection study function." (Motion at p. 23.) The CAISO fully agrees that a stakeholder process is appropriate to vet the changes to the existing interconnection study process resulting from the July 1 Order. A stakeholder process is likely to enhance the effectiveness and support for the ultimate proposal.

The CAISO qualifies its support for the Motion only because it feels that a minimum six-month extension of six months is unnecessarily lengthy. Instead, the CAISO believes that an extension of the compliance filing of approximately six weeks or up to October 14, 2005 on the limited aspect of the centralized study process should be sufficient to fully vet any issues. The CAISO, with the cooperation of the California

¹ The California Parties are Pacific Gas and Electric Company (PG&E), Southern California Edison (SCE), and San Diego Gas & Electric Company (SDG&E). The Motion is set forth as Section V. of the Joint Request of California Parties for Clarification and Rehearing of Order Partially Rejecting Compliance Filings, and Motion to Postpone Portion of Compliance Filing, filed on August 1, 2005.

Parties, has already made substantial progress in developing the requisite centralized study process. Accordingly, the CAISO believes that sufficient details of the proposal exist to promptly initiate a meaningful stakeholder process that will expeditiously produce the necessary stakeholder input to enable the ISO to submit a carefully scrutinized compliance filing by October 14, 2005. In fact, consistent with the foregoing, if the Commission were to grant the California Parties' Motion, the CAISO anticipates conducting an initial stakeholder meeting during the first week of September with a follow-up session during the third week of September. The additional time will permit additional stakeholder input, if necessary, and the incorporation of stakeholder feedback into the final compliance filing.

In summary, the CAISO supports the Motion and joins in requesting that the Commission extend the date for submission of the compliance filing on the topic of the centralized interconnection study process to allow for a stakeholder process. The CAISO further requests that the adopt an extension of time to October 14, 2005, rather than the minimum six months requested by the California Parties.

Respectfully submitted,

/s/ Grant Rosenblum

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Operator Corporation
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System Operator Corporation

Dated: August 10, 2005



August 10, 2005

BY ELECTRONIC TRANSMISSION

The Honorable Magalie Roman Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: California Independent System Operator Corporation
Docket No. ER04-445, et al.
Pacific Gas and Electric Company
Docket No. ER04-443, et al.
San Diego & Electric Company
Docket No. ER04-441, et al.
Southern California Edison Company
Docket No. ER04-435-007
Interconnection for Wind Energy
Docket No. RM05-4-000
**Standardization of Generator Interconnection Agreements
And Procedures**
Docket No. RM02-1-006

Dear Secretary Salas:

Enclosed for electronic filing please find an Answer of The California Independent System Operator Corporation to the California Parties' Motion to Postpone Portion of Compliance Filing in the above-referenced dockets.

Thank you for your assistance in this matter.

Very truly yours,

/s/ Grant Rosenblum

Grant Rosenblum

Counsel for the California Independent
System Operator Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in the above-captioned dockets.

Dated at Folsom, California, on this 10th day of August 2005.

/s/ Grant Rosenblum
Grant Rosenblum