



California Independent  
System Operator Corporation

August 10, 2006

**VIA ELECTRONIC FILING**

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

**Re: Williams Power Company, Inc.  
Docket No. ER05-406-001 and**

**CAISO v. Cabrillo Power I, LLC, et al.  
Docket No. EL02-15-000**

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceedings is the Provisional Protest of the California Independent System Operator Corporation.

Thank you for your attention to this matter.

Yours truly,

**/s/ Sidney Mannheim Davies**

Sidney Mannheim Davies  
Assistant General Counsel  
Counsel for the California Independent  
System Operator Corporation

Enclosure

cc: Service List

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

<b>Williams Power Company, Inc.</b>	)	<b>Docket No. ER05-406-001</b>
<b><i>and</i></b>	)	
<b>CAISO v. Cabrillo Power I, LLC</b>	)	
	)	<b>Docket No. EL02-15-000</b>

**PROVISIONAL PROTEST OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.214, and the Commission’s July 25, 2006, Combined Notice of Filing, the California Independent System Operator Corporation (“CAISO”) submits this Provisional Protest in the above captioned proceeding. In support thereof, the CAISO states as follows:

**I. DESCRIPTION OF THE PROCEEDING**

On July 20, 2006, Williams Power Company, Inc. (“Williams”) submitted a Refund Report detailing the amounts refunded by Williams to the CAISO. Pursuant to the Offer of Settlement (approved by “Order” by the Commission, issued March 21, 2006) the refund was provided to the CAISO on July 6, 2006.

By its Notice issued July 25, 2006, the Commission established August 10, 2006, as the date motions to intervene; comments and/or protests are to be filed in the above-captioned proceeding. The CAISO is already a party to this docket. CAISO originally intervened in the above-referenced docket in January 2005.

## **II. DESCRIPTION OF THE ISO AND COMMUNICATIONS**

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California with its principal place of business at 151 Blue Ravine Road, Folsom, CA 95630. The CAISO is the Control Area operator responsible for the reliable operation of the electric grid comprising the transmission systems of a number of utilities including Southern California Edison Company ("SCE") as well as the coordination of the ancillary services and real-time electricity markets in California.

The CAISO requests that all communications and notices concerning this motion and these proceedings be provided to:

Sidney Mannheim Davies  
Assistant General Counsel  
California Independent System  
Operator Corporation  
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## **III. CAISO'S INTEREST**

The Williams Generation Units are located within SCE's transmission system and are needed to maintain the reliability of the ISO Controlled Grid. As the Control Area operator and as the counter party to the RMR Agreement, the CAISO has a unique interest in any Commission proceeding that affects an RMR Agreement.

#### **IV. PROVISIONAL PROTEST**

The CAISO protests Williams Refund Report. William's interest was incorrectly calculated and the CAISO understands that Williams is aware of this error and will be filing a corrected refund report. CAISO is filing this protest to preserve our right but anticipate that Williams will be filing a corrected version shortly showing corrected interest.

#### **V. CONCLUSION**

For the foregoing reasons, the CAISO respectfully requests that the Commission grant this Provisional Protest and orders Williams to re-file their Refund Report with the corrected interest.

Dated: August 10, 2006

Respectfully submitted

**/s/ Sidney Mannheim Davies**  
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Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
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## **CERTIFICATE OF SERVICE**

I hereby certify that I have, this 10<sup>th</sup> day of August 2006, caused to be served a copy of the forgoing document upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

**/s/ Sidney Mannheim Davies**  
Sidney Mannheim Davies