

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

**Southern California Edison) Docket No. ER07-1034-000
Company)**

**COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION IN SUPPORT OF THE OFFER OF PARTIAL SETTLEMENT
INVOLVING THE LARGE GENERATOR INTERCONNECTION AGREEMENT
FOR GREEN BORDERS GEOTHERMAL, LLC**

Pursuant to Rule 602(f) of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.602(f) (2008), the California Independent System Operator Corporation (“CAISO”) hereby submits its comments on the Offer of Partial Settlement filed by Southern California Edison Company (“SCE”) in the above-captioned proceedings concerning the Large Generator Interconnection Agreement (“LGIA”) among SCE, the CAISO, and Green Borders Geothermal, LLC (“Green Borders”) filed unexecuted by SCE and the CAISO in this proceeding.¹ The Offer of Partial Settlement was filed by SCE on July 30, 2008.

I. COMMENTS

A. The CAISO Supports the Offer of Partial Settlement.

As represented by SCE in the Offer of Partial Settlement, the CAISO has negotiated the Offer of Partial Settlement with SCE and Green Borders and agrees with and supports the Offer of Partial Settlement as appropriately resolving the issues regarding the LGIA that are addressed therein. In particular,

¹ Capitalized terms not otherwise defined herein have the meanings set forth in the Master Definitions Supplement, Appendix A to the CAISO Tariff.

the CAISO agrees with and supports the terms of the revised LGIA filed by SCE as an attachment to the Offer of Partial Settlement.

B. The CAISO Reserves Its Rights Regarding the Single Issue Not Subject to the Offer of Partial Settlement.

As described in the Offer of Partial Settlement, a single issue remains unresolved in this proceeding. This issue is whether the telecommunications facilities on the generator's side of the interconnection should be classified as Interconnection Customer's Interconnection Facilities, Participating TO's Interconnection Facilities, or Network Upgrades. The CAISO asserts that these facilities should be classified as Interconnection Customer's Interconnection Facilities and reserves its right to assert that position in further proceedings on this matter.

II. CONCLUSION

For the reasons explained above, the Commission should accept the Offer of Partial Settlement.

Respectfully submitted,

/s/ Michael D. Dozier

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Dated: August 20, 2008

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 20th day of August, 2008.

Anna Pascuzzo
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