

January 30, 2003

Attn: Commission's Docket Office  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

RE: Docket # R.99-10-025, Order Instituting Rulemaking into Distributed Generation

Dear Clerk:

Enclosed for filing please find an original and eight copies of the Comments of the California Independent System Operator Corporation on the Proposed Decision of Commissioner Lynch in Docket # R.99-10-025. Please date stamp one copy and return to California Independent System Operator in the self-addressed stamped envelope provided.

Thank you.

Sincerely,

Jeanne M. Solé  
Regulatory Counsel

Cc: Attached Service List

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

Order Instituting Rulemaking into Distributed )  
Generation. )  
\_\_\_\_\_ )

R.99-10-025

**COMMENTS OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
ON THE PROPOSED DECISION OF COMMISSIONER LYNCH**

Charles F. Robinson, General Counsel  
Jeanne M. Solé, Regulatory Counsel  
California Independent System Operator  
151 Blue Ravine Road  
Folsom, CA 95630  
Telephone: 916-351-4400  
Facsimile: 916-351-2350

Attorneys for the  
**California Independent System Operator**

Dated: January 30, 2003

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

Order Instituting Rulemaking into Distributed )  
Generation. )  
\_\_\_\_\_ )

R.99-10-025

**COMMENTS OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
ON THE PROPOSED DECISION OF COMMISSIONER LYNCH**

In accordance with CPUC Rules 77.2 and 77.3, the California Independent System Operator (“CA ISO”) respectfully submits these comments on the January 10, 2003 proposed decision of Commissioner Lynch in this matter (“Proposed Decision”). The CA ISO strongly supports the determination in the Proposed Decision that distribution-only wheeling is infeasible, except in the case of distribution systems that are electrically isolated from the transmission grid, and that accordingly, except in these circumstances, distribution-only wheeling tariffs are not appropriate.

The Proposed Decision addresses issues that were the subject of evidentiary hearings and briefing in 2000. The CA ISO participated actively in these proceedings primarily to demonstrate that distributed generators connected to the interconnected grid at the distribution level, both affect and benefit from the interconnected grid and hence the transmission system. The CA ISO explained, moreover, that as Control Area operator it must ensure that generation and load throughout the Control Area are in balance, and that adequate reserves are available within the Control Area to meet the requirements of the Western Electricity Coordinating Council (“WECC,” formerly the Western Systems Coordinating Council or “WSCC”). Accordingly, the CA ISO maintained that distribution-only wheeling tariffs have no technical basis and are inappropriate. The CA ISO identified two circumstances only in which distributed generators have either no, or minimal impact, on the interconnected grid: 1) distributed generators connected to distribution systems that are electrically isolated from the grid; and 2) when the energy transmitted from a distribution-connected generator to a distribution-connected

load does not alter in any way the energy flowing on the CA ISO Controlled Grid and the demand of the load is subject to an automatic curtailment scheme that would disconnect or curtail the load simultaneously with the disconnection or curtailment of the generator. See Proposed Decision at 30.

The Proposed Decision concludes that distribution-only wheeling is infeasible except in the case of distribution systems that are electrically isolated from the grid, and that accordingly, distribution-only wheeling tariffs are not appropriate except in the case of electrically isolated distribution systems. See Proposed Decision at 34. The CA ISO strongly concurs with this conclusion and urges the Commission to adopt it without modification in its final decision.

The Proposed Decision also cites to the CA ISO testimony, notes that there are limited cases beyond electrically isolated distribution systems in which impacts on the transmission system are reduced, and encourages the investor owned utilities, the CA ISO and the Federal Energy Regulatory Commission (“FERC”) to explore whether existing tariffs properly reflect cost causation in the narrow set of transactions identified by the CA ISO as not relying on the full menu of transmission services. See Proposed Decision at 34. The CA ISO is willing to entertain such an exercise as to cases in which the energy transmitted from a distribution-connected generator to a distribution-connected load does not alter in any way the energy flowing on the CA ISO Controlled Grid and the demand of the load is subject to an automatic curtailment scheme that would disconnect or curtail the load simultaneously with the disconnection or curtailment of the generator. See Proposed Decision at 30.

The CA ISO has no comment on the remainder of the Proposed Decision except the section regarding jurisdiction over distributed generation interconnections when sales of excess energy occur. See Proposed Decision at 35-38. The CA ISO has questions about the accuracy and purpose of this section, which appears to conclude that, because interconnection of generators to the distribution system presents issues of local safety, reliability and environmental concern where the state has primary jurisdiction, the Commission, therefore, has jurisdiction over interconnections of generators to the distribution system in all cases.. See Proposed

Decision at 38. This analysis is overly simplistic and likely flawed; particularly in the case of generators interconnecting for the purpose of making wholesale sales. There is a strong case for FERC jurisdiction over such interconnections, as set forth in the Pacific Gas and Electric Company analysis that the Proposed Decision recounts on pages 35-36, and FERC's Notice of Proposed Rulemaking on Standardization of Generator Interconnection Agreements and Procedures issued on April 24, 2002, in FERC docket No. RM02-1-000.

Nonetheless, the CA ISO does not believe that endless discussion about jurisdiction is either necessary or helpful. Where jurisdiction lies is generally a fact specific case-by-case inquiry that is not affected by general pronouncements of the type set forth in the Proposed Decision. Moreover, if state and federal requirements for interconnection to the distribution system are similar, the question of jurisdiction becomes immaterial. As the CA ISO articulated to FERC in its comments regarding interconnection requirements for small generators filed on December 20, 2002 in FERC docket No. RM02-12-000, this is one advantage of both FERC and the CPUC maintaining similar procedures and requirements in the rules for interconnection to the distribution system.

In sum, the CA ISO strongly supports the conclusion in the Proposed Decision that distribution-only wheeling is technically infeasible except in the case of electrically isolated distribution systems, and that accordingly there is no basis for a distribution-only wheeling tariff. The CA ISO respectfully urges the Commission to adopt this conclusion in its final decision.

January 30, 2003      Respectfully Submitted:

By: \_\_\_\_\_  
Jeanne M. Solé  
Attorney for  
California Independent System Operator

Charles F. Robinson, General Counsel  
Jeanne M. Solé, Regulatory Counsel  
California Independent System Operator  
151 Blue Ravine Road  
Folsom, CA 95630  
Telephone: 916-351-4400  
Facsimile: 916-351-2350

Attorneys for  
**California Independent System Operator**

SARAH MCKINLEY  
DISTRIBUTED POWER COALITION OF  
AMERICA  
10 G STREET NE, NO. 700  
WASHINGTON, DC 20002

EDWARD H. COMER  
EDISON ELECTRIC INSTITUTE  
701 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, DC 20004

KEITH MC CREA  
ATTORNEY AT LAW  
SUTHERLAND, ASBILL & BRENNAN  
1275 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, DC 20004-2415

MICHAEL BRIGGS  
RELIANT RESOURCES  
801 PENNSYLVANIA AVENUE, N.W., SUITE 620  
WASHINGTON, DC 20004-2604

KAY DAVOODI  
NAVY RATE INTERVENTION  
1314 HARWOOD STREET, S.E.  
WASHINGTON NAVY YARD, DC 20374-5018

JAMES ROSS  
RCS CONSULTING, INC.  
500 CHESTERFIELD CENTER, SUITE 320  
CHESTERFIELD, MO 63017

A BRUBAKER  
BRUBAKER & ASSOCIATES, INC.  
1215 FERN RIDGE PARKWAY, SUITE 208  
ST. LOUIS, MO 63141

TRAVIS DODD  
WILLIAMS ENERGY SERVICES  
1 WILLIAMS CENTER, MAILDROP 41-3  
TULSA, OK 74172

BRUNO GAILLARD  
ENRON ENERGY SERVICES  
1400 SMITH STREET  
HOUSTON, TX 77002-7327

ROBERT J. FRANK  
DIRECTOR, STATE GOVERNMENT AFFAIRS  
ENRON CORP.  
1400 SMITH STREET  
HOUSTON, TX 77002-7361

BRIDGET BRANIGAN, SENIOR COUNSEL  
SOUTHWEST GAS CORPORATION  
5241 SPRING MOUNTAIN ROAD  
PO BOX 98510  
LAS VEGAS, NV 89193-8510

DAVID NORRIS  
SIERRA PACIFIC POWER CO.  
6100 NEIL ROAD  
RENO, NV 89520

FAY A. CHU  
DEPUTY CITY ATTORNEY  
LOS ANGELES CITY ATTORNEY'S OFFICE  
111 NORTH HOPE JFB 340  
LOS ANGELES, CA 90012

NORMAN A. PEDERSEN  
ATTORNEY AT LAW  
HANNA AND MORTON LLP  
444 SOUTH FLOWER ST., SUITE 1500  
LOS ANGELES, CA 90071-2916

MARK J. SKOWRONSKI  
ELECTRIC POWER GROUP  
201 SOUTH LAKE AVENUE, SUITE 400  
PASADENA, CA 91101

SUSAN ROSS, ATTORNEY AT LAW  
CALIFORNIA POWER EXCHANGE  
CORPORATION  
200 S. LOS ROBLES AVENUE, SUITE 400  
PASADENA, CA 91101-2482

KEVIN DUGGAN  
CAPSTONE TURBINE CORPORATION  
21211 NORDHOFF STREET  
CHATSWORTH, CA 91311

DANIEL W. DOUGLASS  
ATTORNEY AT LAW  
LAW OFFICES OF DANIEL W. DOUGLASS  
5959 TOPANGA CANYON BLVD., SUITE 244  
WOODLAND HILLS, CA 91367

MICHAEL D. MONTOYA, ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770

SUSAN L. CONWAY  
SOUTHERN CALIFORNIA WATER COMPANY  
630 EAST FOOTHILL BLVD  
SAN DIMAS, CA 91773-1212

RICH SPERBERG  
ONSITE SYCOM  
701 PALOMAR AIRPORT ROAD, STE. 200  
CARLSBAD, CA 92009

STEVEN C. NELSON  
ATTORNEY AT LAW  
SEMPRA ENERGY  
101 ASH STREET  
SAN DIEGO, CA 92101-3017

JOHN W. LESLIE, ATTORNEY AT LAW  
LUCE FORWARD HAMILTON & SCRIPPS, LLP  
600 WEST BROADWAY, SUITE 2600  
SAN DIEGO, CA 92101-3391

MICHAEL SHAMES, ATTORNEY AT LAW  
UTILITY CONSUMERS' ACTION NETWORK  
3100 FIFTH AVENUE, SUITE B  
SAN DIEGO, CA 92103

GREGG BUTSKO  
BUTSKO UTILITY DESIGN, INC.  
17065 VIA DEL CAMPO, SUITE 200  
SAN DIEGO, CA 92127

EILEEN M. SMITH  
SOLAR DEVELOPMENT COOPERATIVE  
3535 EAST COAST HIGHWAY 216  
CORONA DEL MAR, CA 92625

LUCINA LEA MOSES  
ASSISTANT CITY ATTORNEY  
CITY OF ANAHEIM  
200 S. ANAHEIM BLVD., SUITE 356  
ANAHEIM, CA 92805

ALAN R. WATTS, ATTORNEY AT LAW  
LAW OFFICES OF ALAN R. WATTS  
529 HILDA COURT  
ANAHEIM, CA 92806-4304

RANDALL J. HICKOK  
DUKE ENERGY NORTH AMERICA  
1290 EMBARCADERO ROAD  
MORRO BAY, CA 93442

NORMAN J. FURUTA  
ATTORNEY AT LAW  
DEPARTMENT OF THE NAVY  
2001 JUNIPERO SERRA BLVD., SUITE 600  
DALY CITY, CA 94014-3890

MARC D. JOSEPH  
ATTORNEY AT LAW  
ADAMS BROADWELL JOSEPH & CARDOZO  
651 GATEWAY BOULEVARD, SUITE 900  
SOUTH SAN FRANCISCO, CA 94080

JOE COMO, ATTORNEY AT LAW  
CITY AND COUNTY OF SAN FRANCISCO  
1 DR. CARLTON B. GOODLETT PLACE  
SAN FRANCISCO, CA 94102

MATTHEW FREEDMAN  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102

JONATHAN BROMSON  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE LEGAL DIVISION  
ROOM 4107  
SAN FRANCISCO, CA 94102-3214

ITZEL BERRIO, ATTORNEY AT LAW  
THE GREENLINING INSTITUTE  
785 MARKET STREET, 3RD FLOOR  
SAN FRANCISCO, CA 94103-2003

SUSAN E. BROWN  
ATTORNEY AT LAW  
LATINO ISSUES FORUM  
785 MARKET STREET, 3RD FLOOR  
SAN FRANCISCO, CA 94103-2003

CLYDE S. MURLEY  
GRUENEICH RESOURCE ADVOCATES  
582 MARKET STREET, SUITE 1020  
SAN FRANCISCO, CA 94104

EVELYN KAHL, ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104

NORA SHERIFF  
ATTORNEY AT LAW  
ALCANTAR & KAHL LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104

PETER HANSCHEN  
ATTORNEY AT LAW  
MORRISON & FOERSTER, LLP  
425 MARKET STREET  
SAN FRANCISCO, CA 94105

SHERYL CARTER  
NATURAL RESOURCES DEFENSE COUNCIL  
71 STEVENSON STREET, SUITE 1825  
SAN FRANCISCO, CA 94105

BRIAN CRAGG, ATTORNEY AT LAW  
GOODIN, MAC BRIDE, SQUERI, RITCHIE &  
DAY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111

JAMES SQUERI, ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI RITCHIE & DAY  
505 SANSOME STREET, STE 900  
SAN FRANCISCO, CA 94111

JEANNE M. BENNETT, ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI RITCHIE & DAY  
LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111

LINDSEY HOW- DOWNING  
ATTORNEY AT LAW  
DAVIS WRIGHT TREMAINE, LLP  
ONE EMBARCADERO, SUITE 600  
SAN FRANCISCO, CA 94111-3834

PETER OUBURG  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442, B30A  
SAN FRANCISCO, CA 94120

RANDALL J. LITTENEKER  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442  
SAN FRANCISCO, CA 94120

SARA STECK MYERS  
ATTORNEY AT LAW  
122 - 28TH AVENUE  
SAN FRANCISCO, CA 94121-1036

SYLVIA D. GARDNER  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000 - B9A  
SAN FRANCISCO, CA 94177-0001

GRANT KOLLING  
SENIOR ASSISTANT CITY ATTORNEY  
CITY OF PALO ALTO  
PO BOX 10250  
PALO ALTO, CA 94303

DAN BERGMANN  
INTERSTATE GAS SERVICES, INC.  
2600 KITTYHAWK ROAD, SUITE 101  
LIVERMORE, CA 94550

PETER W. HANSCHEN  
ATTORNEY AT LAW  
MORRISON & FOERSTER LLP  
101 YGNACIO VALLEY ROAD, SUITE 450  
WALNUT CREEK, CA 94593

ALEXANDER B. MAKLER  
CALPINE CORPORATION  
PO BOX 11749  
PLEASANTON, CA 94588-1749

LANDIS MARTTILA  
SENIOR BUSINESS REPRESENTATIVE  
IBEW LOCAL UNION 1245  
PO BOX 4790  
WALNUT CREEK, CA 94596

WILLIAM H. BOOTH  
ATTORNEY AT LAW  
LAW OFFICES OF WILLIAM H. BOOTH  
1500 NEWELL AVENUE, 5TH FLOOR  
WALNUT CREEK, CA 94596

SETH HILTON  
ATTORNEY AT LAW  
MORRISON & FOERSTER LLP  
101 YGNACIO VALLEY ROAD, SUITE 450  
WALNUT CREEK, CA 94596-4087

CONNIE EASTERLY  
ATTORNEY AT LAW  
UTILITY DESIGN, INC.  
2999 OAK ROAD  
WALNUT CREEK, CA 94597

DIANE FELLMAN  
ENERGY LAW GROUP, LLP  
1999 HARRISON STREET, SUITE 2700  
OAKLAND, CA 94612-3572

DAVID MARCUS  
ADAMS BROADWELL JOSEPH & CARDOZO  
1541 JUANITA WAY PO BOX 1287  
BERKELEY, CA 94701-1287

REED V. SCHMIDT  
BARTLE WELLS ASSOCIATES  
1889 ALCATRAZ AVENUE  
BERKELEY, CA 94703-2714



GREGORY MORRIS  
GREEN POWER INSTITUTE  
2039 SHATTUCK AVE., SUITE 402  
BERKELEY, CA 94704

PHILLIP MULLER  
SCD ENERGY SOLUTIONS  
436 NOVA ALBION WAY  
SAN RAFAEL, CA 94903

JOHN NIMMONS, PRESIDENT  
JOHN NIMMONS & ASSOCIATES, INC.  
175 ELINOR AVENUE SUITE G  
MILL VALLEY, CA 94941

JOSEPH M. KARP  
ATTORNEY AT LAW  
WHITE & CASE LLP  
THREE EMBARCADERO CENTER, SUITE 2210  
SAN FRANCISCO, CA 94941

C. SUSIE BERLIN  
ATTORNEY AT LAW  
MC CARTHY & BERLIN, LLP  
2005 HAMILTON AVENUE, SUITE 140  
SAN JOSE, CA 95125

SCOTT T. STEFFEN  
ATTORNEY AT LAW  
MODESTO IRRIGATION DISTRICT  
1231 ELEVENTH STREET PO BOX 4060  
MODESTO, CA 95352

SCOTT BLAISING  
ATTORNEY AT LAW  
BRAUN & ASSOCIATES, P.C.  
8980 MOONEY ROAD  
ELK GROVE, CA 95624

JEANNE SOLE  
CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

JAMES WEIL  
AGLET CONSUMER ALLIANCE  
PO BOX 1599  
FORESTHILL, CA 95631

GARY DERCK  
PRESIDENT, REGULATORY AFFAIRS  
MOUNTAIN UTILITIES  
PO BOX 1  
KIRKWOOD, CA 95646

DOUGLAS K. KERNER  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS  
2015 H STREET  
SACRAMENTO, CA 95814

EMILIO E. VARANINI III  
GENERAL COUNSEL  
CALIFORNIA POWER AUTHORITY  
901 P STREET, SUITE 142A  
SACRAMENTO, CA 95814

LOREN KAYE  
POLIS GROUP  
1115 11TH STREET, SUITE 100  
SACRAMENTO, CA 95814

STEVEN GREENBERG  
REAL ENERGY  
300 CAPITOL MALL, SUITE 120  
SACRAMENTO, CA 95814

PATRICK MC LAFFERTY  
NEXTEL POWER SYSTEMS, INC.  
921 11TH STREET, STE. 501  
SACRAMENTO, CA 95814-2820

JEFFERY D. HARRIS  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS  
2015 H STREET  
SACRAMENTO, CA 95814-3109

ANDREW BROWN  
ATTORNEY AT LAW  
ELLISON & SCHNEIDER  
2015 H STREET  
SACRAMENTO, CA 95814-3512

LYNN M. HAUG  
ATTORNEY AT LAW  
ELLISON & SCHNEIDER  
2015 H STREET  
SACRAMENTO, CA 95814-3512

RONALD LIEBERT  
ATTORNEY AT LAW  
CALIFORNIA FARM BUREAU FEDERATION  
2300 RIVER PLAZA DRIVE  
SACRAMENTO, CA 95833

ARLEN ORCHARD  
ATTORNEY AT LAW  
SACRAMENTO MUNICIPAL UTILITY DISTRICT  
PO BOX 15830, MS-B406  
SACRAMENTO, CA 95852-1830

MICHAEL ALCANTAR  
ATTORNEY AT LAW  
ALCANTAR & KAHL LLP  
1300 SW FIFTH AVENUE, SUITE 1750  
PORTLAND, OR 97201

MATTHEW WRIGHT  
V. P. REGULATION  
PACIFICORP  
825 NE MULTNOMAH, SUITE 800  
PORTLAND, OR 97232

DONALD SCHOENBECK  
RCS CONSULTING  
900 WASHINGTON STREET, SUITE 1000  
VANCOUVER, WA 98660

MARIA E. STEVENS  
CALIF PUBLIC UTILITIES COMMISSION  
320 WEST 4TH STREET SUITE 500  
EXECUTIVE DIVISION  
LOS ANGELES, CA 90013

AARON J JOHNSON  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
EXECUTIVE DIVISION ROOM 5205  
SAN FRANCISCO, CA 94102-3214

ANTHONY MAZY  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ELECTRICITY RESOURCES AND PRICING  
BRANCH RM 4209  
SAN FRANCISCO, CA 94102-3214

BRADFORD WETSTONE  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
DECISION-MAKING SUPPORT BRANCH  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214

CHRISTOPHER DANFORTH  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ELECTRICITY RESOURCES AND PRICING  
BRANCH RM 4209  
SAN FRANCISCO, CA 94102-3214

DANIEL M BERMAN  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ELECTRICITY RESOURCES AND PRICING  
BRANCH RM 4209  
SAN FRANCISCO, CA 94102-3214

DONALD R SMITH  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ELECTRICITY RESOURCES AND PRICING  
BRANCH ROOM 4209  
SAN FRANCISCO, CA 94102-3214

EDGAR A. QUIROZ  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ELECTRICITY RESOURCES AND PRICING  
BRANCH RM 4209  
SAN FRANCISCO, CA 94102-3214

GEORGE CLUFF  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
CONSUMER ISSUES BRANCH ROOM 4102  
SAN FRANCISCO, CA 94102-3214

JULIE HALLIGAN  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5025  
SAN FRANCISCO, CA 94102-3214

MARTIN G. LYONS  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ENERGY COST OF SERVICE BRANCH  
ROOM 4205  
SAN FRANCISCO, CA 94102-3214

ROSALINA WHITE  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
PUBLIC ADVISOR OFFICE AREA 2-B  
SAN FRANCISCO, CA 94102-3214

TIMOTHY J. SULLIVAN  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5007  
SAN FRANCISCO, CA 94102-3214

WERNER M. BLUMER  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
INVESTIGATION, MONITORING &  
COMPLIANCE BRANCH AREA 4-A  
SAN FRANCISCO, CA 94102-3214

MIGNON MARKS  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET, MS 15  
SACRAMENTO, CA 95814

SCOTT TOMASHEFSKY  
CALIFORNIA ENERGY COMMISSION  
1516 - 9TH STREET, MS-31  
SACRAMENTO, CA 95814

JONATHAN M. TEAGUE  
MANAGER, ELECTRICITY SERVICES  
CALIFORNIA DEPT. OF GENERAL SERVICES  
717 K STREET, SUITE 409  
SACRAMENTO, CA 95814-3406

EDWIN QUAN  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
INFORMATION & MANAGEMENT SERVICES  
DIVISION RM 3016  
SAN FRANCISCO, CA 94102-3214

GREGORY A. WILSON  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
DECISION-MAKING SUPPORT BRANCH  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214

KIRK BRACHT  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
DECISION-MAKING SUPPORT BRANCH  
ROOM 4000  
SAN FRANCISCO, CA 94102-3214

MICHELLE COOKE  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5006  
SAN FRANCISCO, CA 94102-3214

SCOTT CAUCHOIS  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ELECTRICITY RESOURCES AND PRICING  
BRANCH ROOM 4209  
SAN FRANCISCO, CA 94102-3214

TROID O EDWARDS  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
MARKET DEVELOPMENT BRANCH  
ROOM 4101  
SAN FRANCISCO, CA 94102-3214

WILLIAM JOHNSTON  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
TELECOMMUNICATIONS BRANCH ROOM 4101  
SAN FRANCISCO, CA 94102-3214

DARCIE HOUCK STAFF COUNSEL  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS 14  
CHIEF COUNSEL'S OFFICE  
SACRAMENTO, CA 95814

TOM FLYNN  
POLICY ADVISOR  
ELECTRICITY OVERSIGHT BOARD  
770 L STREET SUITE 1250  
SACRAMENTO, CA 95814

JAIRAM GOPAL  
FUELS OFFICE  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET, MS-23  
SACRAMENTO, CA 95814-5512

FRED L. CURRY  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
WATER ADVISORY BRANCH ROOM 3106  
SAN FRANCISCO, CA 94102-3214

JOHN GALLOWAY  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ANALYSIS BRANCH AREA 4-A  
SAN FRANCISCO, CA 94102-3214

LEE-WHEI TAN  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
TELECOMMUNICATIONS BRANCH ROOM 4101  
SAN FRANCISCO, CA 94102-3214

NATALIE WALSH  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
WATER AND NATURAL GAS BRANCH  
ROOM 3200  
SAN FRANCISCO, CA 94102-3214

STEVEN C ROSS  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ELECTRICITY RESOURCES AND PRICING  
BRANCH ROOM 4209  
SAN FRANCISCO, CA 94102-3214

VALERIE BECK  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ANALYSIS BRANCH AREA 4-A  
SAN FRANCISCO, CA 94102-3214

ZENaida G. TAPAWAN-CONWAY  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ANALYSIS BRANCH AREA 4-A  
SAN FRANCISCO, CA 94102-3214

MICHAEL R. JASKE  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET, MS-22  
SACRAMENTO, CA 95814

VINCENT SCHWENT  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS-45  
SACRAMENTO, CA 95814

PROOF OF SERVICE

I hereby certify that on January 30, 2003, I served by electronic and U.S. mail, the Comments of the California Independent System Operator on the Proposed Decision of Commissioner Lynch in Docket # R. 99-10-025.

DATED at Folsom, California on January 30, 2003.

---

Mui (Karen) Au  
An Employee of the California  
Independent System Operator