

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

Order Instituting Rulemaking to Consider)	
Refinements to and Further Development of the)	R.05-12-013
Commission's Resource Adequacy)	
Requirements Program)	
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**COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
ON THE ADMINISTRATIVE LAW JUDGE'S RULING REGARDING
REVISED PROTECTIVE ORDER**

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Attorneys for the
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Dated: January 23, 2006

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REVISED PROTECTIVE ORDER**

In accordance with the Administrative Law Judge’s Ruling Regarding Revised Protective Order, issued on January 17, 2006 (“RPO Ruling”), the California Independent System Operator Corporation (“CAISO”) respectfully submits the following comments in support of the RPO Ruling.

I. The CAISO Supports the RPO With Two Suggested Modifications

The RPO Ruling proposes to replace the Interim Protective Order (“IPO”) adopted in the June 24, 2005 “Administrative Law Judge’s Ruling Directing Load Serving Entities to Submit Load Data and Adopting Protective Order” with a Revised Protective Order (“RPO”). The CAISO agrees that the RPO sets forth several material improvements over the IPO. Moreover, as discussed below, one of the suggested improvements in the RPO removes an existing obstacle under the IPO that hinders the CAISO from currently designating “ISO Reviewing Representatives” to assist the Commission in evaluating the sufficiency of the initial Resource Adequacy Requirement (“RAR”) year-ahead compliance filings. The RAR year-ahead compliance filings, which were originally due January 27, 2006, must now be filed on or about

February 12, 2006.¹ As such, the CAISO respectfully requests that the ALJ adopt the RPO in a timely manner so that the CAISO can ensure full compliance with its terms prior to the revised RAR showing date.

A. Specific Modifications Supported by the CAISO

In particular, the CAISO supports the following proposed changes incorporated into the RPO:

1. Paragraph c of Section 7 of the IPO prohibited any “Reviewing Representative,” which includes an ISO Reviewing Representative” from, among other things, accepting employment from any entity that directly or indirectly buys, sells or markets electricity or bids on or purchases power plans for a period of two years. Given the highly specialized nature of the skills required of ISO Reviewing Representatives, this prohibition was highly onerous if not legally unenforceable. The CAISO commends the ALJ for modifying Section 7 of the RPO to eliminate the provisions limiting employment opportunities. The RPO is appropriately tailored to restrict the use of Protected Materials, regardless of employment, to the development, implementation and operation of an RAR program. This restriction and the enforcement provisions of the RPO sufficiently protect the integrity of Protected Materials.
2. The CAISO supports expanding access to Protected Materials to “non-market participants.” Nevertheless, as discussed below, the CAISO believes that the scope of access provided to ISO Reviewing Representatives is unduly and impractically narrow.
3. The CAISO supports applying the RPO to this proceeding, rather than limiting its applicability to 2006 RAR compliance only. The CAISO agrees that the 2007 compliance cycle makes it reasonable to extend the use of the RPO.
4. The CAISO strongly supports clarifying that the RPO covers the resource tabulations of Load Serving Entities.

B. Specific Suggested Modifications to RPO

The CAISO posits that adopting two additional modifications could enhance the RPO and the efficiency of the implementation of the RAR:

1. Paragraph a of Section 7, relating to “Access to Protected Materials and Use of Protected Materials,” has been modified to state:

¹ See Letter from Steve Larson, Executive Director of the Commission, to Daniel W. Douglass, dated June 20, 2006, granting a joint request for extension of time to submit compliance filings by Southern California Edison, Pacific Gas and Electric Company, and the Alliance for Retail Energy Markets. The extension is for 10 days after the CAISO completes “Step 6” of the intertie allocation process adopted by the Energy Division in its December 21, 2005, Resource Adequacy Guide. The CAISO anticipates completing Step 6 on February 2, 2006.

Subject to the terms of this Protective Order, Reviewing Representatives shall be entitled to access to Protected Materials provided by public utilities, except that the Disclosing Parties may redact price information from Protected Materials made available to ISO Reviewing Representatives *and except that Staff Reviewing Representatives may have access to Electric Service Provider (“ESP”) Protected Materials. Notwithstanding any other provision of this Protective Order, access for parties other than Staff Reviewing Representatives to information submitted by an ESP shall be limited to a public aggregation of all ESP data to be compiled by the Commission’s Energy Division or the staff of the California Energy Commission, and the original Protected Material submissions by ESPs shall be held in confidence by the Commission and the California Energy Commission.* [additions in italics.]

The CAISO interprets this provision as limiting the review of Protected Materials, including resource tabulations, submitted by Electric Service Providers (“ESPs”) only to Staff Reviewing Representatives. It is unclear to the CAISO how it will fulfill its role of reviewing resource tabulations when the submission of a significant proportion of the LSEs will be unknown. It is further unclear why receive this disparate treatment. Simply put, unless the CAISO has the ability to review all resource tabulations, its effectiveness in assisting the Commission to determine RAR compliance will be compromised. Thus, the CAISO suggests that this provision be amended to include ISO Reviewing Representative along with Staff Reviewing Representative as having access to ESP Protected Materials.

2. Section 8 appears to exempt Staff Reviewing Representatives from executing a Non-Disclosure Certificate. The salutary basis for this exemption is that the Commission’s and CEC’s ongoing, routine involvement renders it impractical to require each individual employee to execute the Non-Disclosure Certificate given the likelihood of employment turn-over or internal transfer of job functions. If the CAISO is to have a recurring role in RAR implementation, the same practical concerns militate that the CAISO also be exempt from having each employee separately sign the Non-Disclosure Certificate. This is especially true if the CAISO is to participate in review of the monthly RAR compliance showings. Moreover, unlike other reviewing entities, CAISO employees are subject to a strict Code of Conduct, which is attached hereto. Consequently, that section should also be amended to include ISO Reviewing Representative along with Staff Reviewing Representative.

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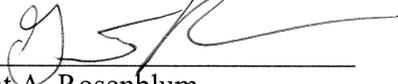
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II. Conclusion

For the foregoing reasons, the CAISO respectfully requests that the ALJ adopt the RPO with the modifications suggested above and that such approval occur in a time frame to allow the CAISO to utilize the RPO for those employees that will review the initial RAR showings.

January 23, 2006

Respectfully Submitted:

By: 

Grant A. Rosenblum

Attorney for

California Independent System Operator

EMPLOYEES CODE OF CONDUCT

The Code of Conduct for officers, employees and substantially full-time consultants and contractors of the California Independent System Operator Corporation (the "Corporation") shall be as follows:

(a) STANDARDS

Non-Participation in Energy Transactions

1. Neither the Corporation, its officers, its employees or its substantially full-time consultants or contractors will act as a broker in connection with any power or energy sale or purchase.
2. Neither the Corporation, its officers, its employees or its substantially full-time consultants or contractors will purchase electricity, except for ordinary personal uses, or sell electricity except to the extent necessary to carry out the Corporation's functions.
3. Unless a request has been made in writing, supported by specific reasons, and unless prior written approval has been granted by the Governing Board, no officer or employee of the Corporation, and no substantially full-time consultant or contractor to the Corporation, may be an employee, director or attorney for, or a substantially full-time consultant or contractor to, any entity engaged in the generation, transmission, marketing or distribution of electricity (a "Market Entity"). Any such request shall be noticed on the agenda of the meeting of the Governing Board at which action on the request is scheduled to be taken and shall be deemed approved by the Governing Board if at least a majority of the Governors then in office vote in favor of granting such request.
4. No person shall become an officer or full-time or part-time employee of the Corporation, and no person shall be hired as a substantially full-time consultant or contractor to the Corporation, unless such person has agreed in writing to dispose of securities owned by such person which were issued by a Market Entity or any affiliate thereof within six (6) months after the time such person is to commence providing services to the Corporation (no later than April 30, 1998, for persons employed by the Corporation on October 30, 1997) in order to assure that such person will not directly or indirectly (e.g., through a family trust, self directed pension or profit sharing plan, or employee benefit plan) own securities issued by a Market Entity or any affiliate thereof. Any question regarding whether particular securities are subject to this divestiture requirement, including shares of mutual funds or other collective investment vehicles owning securities issued by a Market Entity or any affiliate thereof, should be directed to the Corporation's Legal Department.

5. No officer or employee of the Corporation, and no substantially full-time consultant or contractor to the Corporation, shall acquire, directly or indirectly (e.g., through a family trust, self directed pension or profit sharing plan, or employee benefit plan) securities issued by a Market Entity or any affiliate thereof. Any questions regarding whether particular securities are subject to this limitation, including shares of mutual funds or other collective investment vehicles owning securities issued by Market Entity or any affiliate thereof, should be directed to the Corporation's Legal Department.

Administration of Tariffs

6. It is the policy of the Corporation to offer open-access transmission service on a non-discriminatory basis.
7. If there is discretion in the application of any tariff provision relating to the transmission of electricity, including, but not limited to, cost, available transmission capacity, scheduling, dispatching, ancillary services or transmission curtailment priority, the Corporation, its officers, employees and substantially full-time consultants and contractors will apply the tariff provision in substantially the same manner to the same or similarly situated persons.
8. The Corporation, its officers, employees and substantially full-time consultants and contractors will strictly enforce any tariff provision relating to transmission service which does not, by its terms, provide for the exercise of discretion.
9. The Corporation, its officers, employees and substantially full-time consultants and contractors will process all similar requests for transmission in a non-discriminatory manner and without undue delay. The Corporation will maintain for public inspection records of all requests for transmission, when each request was received, and the determination of each request.
10. To the extent that the Corporation may grant a waiver of a non-material rule which provides for discretionary waiver, the Corporation will maintain a written log of each waiver of a rule, the circumstances involved, the person authorizing such waiver and the source of authority for such waiver and provide the log for review and copying at the request of any interested person at such person's expense during regular business hours at the Corporation's offices.

Non-disclosure of Transactional Information

11. The Corporation, its employees, and its substantially full-time consultants and contractors will abide by the Standards of Conduct for Public Utilities set forth in FERC Order 889 and 889A, as those standards are codified in 18 C.F.R. Section 37.1-37.4, as amended, or any successor law.

Use of Information

12. No employee shall use any non-public information obtained in his or her capacity as an employee for his or her own personal gain or to the detriment of the Corporation except to the extent authorized by the Corporation's bylaws, any law or any court order.

General

13. Corporation officers, employees and substantially full-time consultants and contractors shall comply with all laws and regulations applicable to the conduct of the business of the Corporation and this Code of Conduct. Officers, employees or substantially full-time consultants or contractors who become aware of any illegal or improper conduct on the part of another officer, employee or substantially full-time consultant or contractor, or conduct inconsistent with this Code of Conduct, shall promptly report such conduct to their supervisor or the General Counsel of the Corporation.
14. Corporation officers, employees and substantially full-time consultants and contractors shall not put themselves in a position in which their personal interests and those of the Corporation might be in conflict or which might interfere with the officer's, employee's, consultant's or contractor's ability to perform his or her job as well as possible.
15. Corporation officers, employees and substantially full-time consultants and contractors shall not use any Corporation property or services for personal gain and shall not remove or dispose of the materials, supplies or equipment of the Corporation without proper authority.
16. Corporation officers, employees and substantially full-time consultants and contractors shall not accept any form of gratuity which would tend to affect, or give the appearance of affecting, their judgment in the performance of their duties. Food, refreshments and entertainment in the course of a luncheon, dinner, other meeting or corporate event, and non-cash gifts, such as pens, pencils, note pads, calendars, clothing or gifts received as a promotional matter or for a special occasion, are examples of acceptable gratuities. Cash in any form or amount is not considered an acceptable gift and is explicitly forbidden. Such individuals shall keep a personal written record of all forms of gratuities with an individual value of \$50 or more ("Recordable Gratuities") they do accept. In no event may an officer, employee or substantially full-time consultant or contractor accept Recordable Gratuities with an aggregate value in excess of \$250 per source per year.
17. Corporation officers, employees and substantially full-time consultants and contractors shall not give or offer to give gratuities in any form to anyone for the purpose of influencing their judgment in the performance of their duties.

18. Corporation officers, employees and substantially full-time consultants and contractors shall not use funds or resources of the Corporation in support of any political party or candidate for elected office. A Corporation officer, employee or substantially full-time consultant or contractor may not use his or her position, authority, or influence with the Corporation for the purpose of affecting the result of an election or a nomination or a party or public office. An officer, employee or substantially full-time consultant or contractor shall not directly or indirectly coerce, attempt to coerce, command or advise another officer, employee or substantially full-time consultant or contractor, to pay, lend, or contribute anything of value or to contribute personal services to a party, committee, organization, agency or person for political purposes.
19. Corporation officers, employees and substantially full-time consultants and contractors with responsibility to initiate or modify entries in the Corporation's accounting records shall perform such duties in accordance with management's directions and in conformance with the Corporation's accounting policies and procedures.
20. Corporation officers, employees and substantially full-time consultants and contractors shall not, except as may be allowed by a recognized legal privilege or appropriate assertion of confidentiality, withhold information from or give false or misleading information to anyone conducting duly authorized investigations or audits of or relating to the Corporation or its business.
21. Corporation officers, employees and substantially full-time consultants and contractors shall not discriminate against anyone on any unlawful basis, including sex, race, religion, color, national origin, sexual orientation, age, medical condition, physical or mental disability, HIV or AIDS condition, marital status, veteran status, or family leave status.
22. Corporation officers, employees and substantially full-time consultants and contractors shall not be under the influence of alcohol, or possess, use or be under the influence of illegal drugs while on the job or during work hours, including meal breaks.

(b) IMPLEMENTATION

1. The Corporation will inform and train its officers, employees and substantially full-time consultants and contractors in appropriate provisions of federal and state law. The Corporation will direct all of its officers, employees, and substantially full-time consultants and contractors to comply with appropriate provisions of federal and state law. The Corporation will monitor its officers, employees and substantially full-time consultants and contractors, and will conduct periodic reviews to ensure continued compliance. The Corporation will instruct its officers, employees and substantially full-time consultants and contractors to contact their

supervisors or the General Counsel of the Corporation if they have any questions regarding applicable federal or state law or this Code of Conduct.

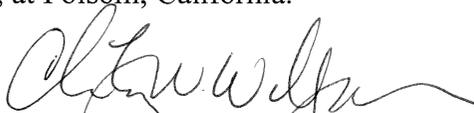
2. The Corporation will distribute copies of this Code of Conduct to all of its officers, employees and substantially full-time consultants and contractors. Copies of this Code of Conduct will be provided to any new officer, employee and substantially full-time consultant and contractor as part of an orientation process. The Corporation will direct all of its officers, employees and substantially full-time consultants and contractors to comply with this Code of Conduct. All officers, employees and substantially full-time consultants and contractors shall be required to complete an annual disclosure questionnaire regarding compliance with this Code of Conduct and investments in Market Entities; provided, however, that the Governing Board may determine that certain categories of non-management employees, consultants and contractors of the Corporation shall not be required to complete such questionnaire or may complete an abbreviated questionnaire.
3. The Governing Board of the Corporation will evaluate the Corporation's experience and refine these procedures, if necessary, to ensure continued compliance with this Code of Conduct.
4. The Audit Committee shall monitor compliance with this Code of Conduct and shall make a compliance report to the full Governing Board at least annually.
5. Any officer, employee or substantially full-time contractor or consultant of the Corporation shall be subject to discipline for failure to comply with all applicable federal and state laws or for failure to comply with this Code of Conduct. Discipline may take the form of reprimand, suspension without pay, limitation in the scope of responsibilities, monetary fines, or termination, in accordance with policies approved by the Governing Board.

The Governing Board shall adopt guidelines and policies for granting waivers of compliance with paragraph (a)(3) of this Code of Conduct.

CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail,
Comments of The California Independent System Operator Corporation on The
Administrative Law Judge's Ruling Regarding Revised Protective Order in Docket No.
R.05-12-013.

Executed on January 23, 2006, at Folsom, California.



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An Employee of the California
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