

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

<b>Unnamed Entity,</b>	)	
<b>Complainant,</b>	)	
	)	
<b>v.</b>	)	<b>Docket No. EL12-70-000</b>
	)	
<b>California Independent System</b>	)	
<b>Operator Corporation,</b>	)	
<b>Respondent</b>	)	

**ANSWER OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
CORPORATION TO COMPLAINT**

The California Independent System Operator Corporation (“ISO”) hereby submits an abbreviated answer (“Answer”) to the complaint (“Complaint”) filed in this proceeding by Unnamed Entity on May 21, 2012.<sup>1</sup> Unnamed Entity asks the Commission to reverse or reduce sanctions that the ISO levied on Unnamed Entity for a failure to respond in a timely manner to certain information requests issued by the ISO’s Department of Market Monitoring on May 4, 2011.

The Complaint contains numerous factual errors, including misstatements. It is also legally without merit. The ISO in particular notes the filing yesterday in this docket by the Commission’s Office of Enforcement demonstrating that it had expressly directed the ISO to continue to seek responses to the information requests at issue.

The ISO has prepared an answer including a full rebuttal of Unnamed Entity’s statements and arguments. In light of the “Motion to Withdraw Section 206 Complaint” filed in this docket today by Unnamed Entity, the ISO will not burden the Commission

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<sup>1</sup> The ISO submits this filing pursuant to Rules 206(f) and 213 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.206(f), 385.213.

and its staff with the detailed answer. The ISO reserves the right under Rule 215, 18 C.F.R. § 385.215, to amend this answer to present a complete response to the Complaint in the event that the Commission denies Unnamed Entity's motion. The ISO notes that, in email service of the "Motion to Withdraw Section 206 Complaint," counsel for Unnamed Entity stated, "[W]e do not believe you are obligated to file your answer today despite the Notice in this docket. If you elect not to file in reliance upon the Motion to Withdraw, [Unnamed Entity] will not oppose a late filing of that answer if for some reason the Commission does not grant the Motion to Withdraw."

All service of pleadings and documents and all communications regarding this proceeding should be addressed to the following:

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Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service list for the above-referenced 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 Washington, D.C. this 20<sup>th</sup> day of June, 2012.

*/s/ Daniel Klein*  
Daniel Klein