

# ALSTON & BIRD LLP

601 Pennsylvania Avenue, N.W.  
North Building, 10<sup>th</sup> Floor  
Washington, DC 20004-2601

202-756-3300  
Fax: 202-756-3333

Bradley R. Miliauskas

Direct Dial: 202-756-3405

Email: [bradley.miliauskas@alston.com](mailto:bradley.miliauskas@alston.com)

November 17, 2005

## VIA ELECTRONIC FILING

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

**Re: California Independent System Operator Corporation,  
Docket No. ER05-1533-000**

Dear Secretary Salas:

Attached please find the Answer of the California Independent System Operator Corporation to the Motion to Submit Late Filed Supplemental Comments and Supplemental Comments of the City and County of San Francisco, submitted in the above-captioned docket.

Thank you for your assistance in this matter.

Respectfully submitted,

/s/ Bradley R. Miliauskas

Bradley R. Miliauskas

Counsel for the California Independent  
System Operator Corporation

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

California Independent System            )  
Operator Corporation                        )     Docket No. ER05-1533-000

**ANSWER OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
CORPORATION TO MOTION TO SUBMIT LATE FILED SUPPLEMENTAL  
COMMENTS AND SUPPLEMENTAL COMMENTS OF THE CITY AND  
COUNTY OF SAN FRANCISCO**

Pursuant to Rule 213 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.213 (2005), the California Independent System Operator Corporation (“ISO”)<sup>1</sup> submits its answer to the motion to submit late filed supplemental comments and supplemental comments of the City and County of San Francisco (“CCSF”) in the captioned proceeding. This proceeding concerns the ISO’s filing of an amendment to the Interconnected Control Area Operating Agreement (“Amendment,” submitted in the “Amendment Filing”) between the ISO and the Sacramento Municipal Utility District (“SMUD”). The purpose of the Amendment is to facilitate the transfer of the system of the Modesto Irrigation District (“Modesto”) and the 500 kV California-Oregon Transmission Project (“COTP”) transmission line from the ISO Control Area to the SMUD Control Area, as requested by Modesto and the COTP, and to facilitate the implementation of a pilot Pseudo Tie of a Generating Unit currently

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<sup>1</sup> Capitalized terms not otherwise defined have the meanings set forth in the Master Definitions Supplement, Appendix A to the ISO Tariff.

in the SMUD Control Area to the ISO Control Area, effective on December 1, 2005. Transmittal Letter for Amendment Filing at 1.

**I. STATEMENT OF ISSUES**

In accordance with Rule 203(a)(7), 18 C.F.R. 385.203(a)(7), the ISO provides this Statement of Issues.

1. Whether the Commission should accept the Amendment, in light of the ISO's unilateral filing of an Interim Operations Agreement between the ISO and CCSF to address the issues raised by CCSF in the present proceeding.

**II. ANSWER**

CCSF raises the issues that (1) Modesto's Control Area change should not adversely affect CCSF or cause a change of Control Area for CCSF facilities; (2) Modesto's Control Area change should not result in an unauthorized and uncompensated use of CCSF facilities that have not been turned over to the ISO's operational control; (3) Modesto's Control Area change should not cause CCSF to incur additional ISO charges for existing transactions; and (4) the Commission should clarify that the Amendment does not govern the use or operation of CCSF facilities. See CCSF at 2, 3-5.

The ISO is sympathetic to CCSF's concerns. In order to address those concerns, the ISO proposes to make a unilateral filing of a special agreement, an Interim Operations Agreement between the ISO and CCSF. The ISO is submitting that agreement on the same day that it is submitting the present filing.

With the filing of the proposed Interim Operations Agreement, the ISO submits that CCSF's concerns should be addressed in the proceeding on that agreement and that the Commission should accept the Amendment and make it effective as of December 1, 2005 as requested.

**III. CONCLUSION**

Wherefore, the ISO respectfully requests that the Commission approve the Amendment subject to the discussion provided above.

Respectfully submitted,

Charles F. Robinson  
General Counsel  
John Anders  
Senior Counsel  
The California Independent  
System Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 351-4400  
Fax: (916) 608-7222

/s/ Michael E. Ward  
Michael E. Ward  
Bradley R. Miliauskas  
Alston & Bird LLP  
601 Pennsylvania Avenue, NW  
North Building, 10th Floor  
Washington, D.C. 20004-2601  
Tel: (202) 756-3405  
Fax: (202) 756-3333

Dated: November 17, 2005

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary 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).

/s/ John Anders  
John Anders