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FEDERAL ENERGY REGULATORY COMMISSION

# TROUTMAN SANDERS LLP

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September 9, 2008

The Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**Re: 2009 CRR Release Process, Docket No. ER08-\_\_\_-000.**

Dear Secretary Bose:

On September 8, 2008, pursuant to Section 205 of the Federal Power Act ("FPA"), 16 U.S.C. § 824d, and Part 35 of the Federal Energy Regulatory Commission's ("FERC" or "Commission") regulations, 18 C.F.R. § 35 *et seq.*, the California Independent System Operator Corporation ("CAISO") submitted an original and five (5) copies of proposed revisions to the CAISO's currently-effective tariff ("September 8 Filing"). The filing involves three aspects of the CAISO's allocation and auction of Congestion Revenue Rights ("CRRs") for calendar year 2009.

The CASIO requested that the Commission approve the proposed changes to the currently-effective CAISO Tariff in order to enable the CAISO to release CRRs for 2009 in accordance with implementation of Market Redesign and Technology Upgrade ("MRTU") in early 2009.<sup>1</sup> The 2009 CRR allocation and auction process must be conducted in advance of February 1, 2009 -- the current, earliest go-live date for the MRTU Tariff -- and the CAISO requested waiver of the notice requirements in 18 C.F.R. § 35.3 (2008) in order to allow the proposed changes to take effect on September 10, 2008.<sup>2</sup>

Pursuant to Section VII of the Transmittal Letter, the CAISO intended to serve copies of this transmittal letter, and all attachments, on the California Public Utilities Commission, the California Energy Commission, and all entities with effective Scheduling Coordinator Service Agreements under the current CAISO Tariff.<sup>3</sup> The CAISO also intended to: (i) post the transmittal letter and all attachments on the CAISO Website, and (ii) provide courtesy copies of this filing to all parties in the MRTU proceeding (Docket No. ER06-615).<sup>4</sup>

<sup>1</sup> See Transmittal Letter to the September 8 Filing at 17-18.

<sup>2</sup> *Id.*

<sup>3</sup> *Id.* at 18.

<sup>4</sup> *Id.*

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This letter is to inform the Commission that service of the filing was made today, not yesterday as intended. The CAISO apologizes for the error. The CAISO does not request waiver of Rule 210 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.210 (2008), and accepts the Commission's establishment of a date for notices of intervention, protests or comments as if the September 8 Filing were made today. However, the CAISO respectfully renews its request waiver of the notice requirements in 18 C.F.R. § 35.3 (2008) in order to allow the proposed changes to take effect on September 10, 2008.

Respectfully Submitted,



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System Operator Corporation