

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

Independent Energy Producers Association,	)	
Complainant,	)	
	)	
v.	)	Docket No. EL05-146-000
	)	
California Independent System	)	
Operator Corporation,	)	
Respondent	)	
	)	

**ANSWER OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION  
TO THE MOTION FOR LEAVE TO FILE ANSWER OF THE  
INDEPENDENT ENERGY PRODUCERS ASSOCIATION**

Pursuant to Rule 213 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.213, the California Independent System Operator Corporation (“ISO”) respectfully submits this Answer to the Motion for Leave to File Answer of the Independent Energy Producers Association (“IEP”) filed in the above-identified docket. IEP filed its Motion in order to respond to the ISO’s Answer to its Complaint filed on August 26, 2005, and to clarify the relief it requested in its Complaint. In the Answer accompanying its Motion, IEP clarifies that it is not seeking to have its proposed Reliability Capacity Services Tariff (“RCST”) implemented prior to June 1, 2006.

The ISO does not oppose IEP’s Motion and indeed welcomes the clarification. The ISO agrees with IEP regarding the need for a backstop for the Resource Adequacy requirement that will replace the Must Offer Requirement on June 1, 2006.

IEP has been working diligently and cooperatively with the ISO to develop a workable reliability capacity service to serve as such a backstop. IEP's RCST proposal represents the progress that has been made through those efforts. Although the ISO's Answer identified a number of issues that remain to be addressed regarding the appropriate design of a capacity backstop, the ISO is confident that the proposed technical conference can resolve them. The ISO fully supports IEP's efforts to ensure the timely implementation of an efficient and fully compensatory backstop service on June 1, 2006 and is committed to continue to work with IEP and other stakeholders toward that end.

By this filing, the ISO wishes to clarify that it did not, by its Answer, intend to oppose implementation of an appropriately designed RCST mechanism as a replacement for the must offer obligation on June 1, 2006, as clarified by IEP's Answer.

Respectfully submitted,

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**/s/ Anthony J Ivancovich**  
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Counsel for the California Independent  
System Operator Corporation



October 18, 2005

The Honorable Magalie Roman Salas  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**Re: Independent Energy Producers Association vs.  
California Independent System Operator Corporation  
Docket Nos. EL05-146-000**

Dear Secretary Salas:

Enclosed please find an electronic filing of an Answer of The California Independent System Operator Corporation to Motion for Leave to File Answer of the Independent Energy Producers Association.

Thank you for your attention to this filing.

Respectfully submitted,

**/s/ Anthony J. Ivancovich**  
Anthony J. Ivancovich

Counsel for the California Independent  
System Operator Corporation

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list for the captioned proceeding, in accordance with Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California, on this 18th day of October, 2005.

**/s/ Anthony J. Ivancovich**  
Anthony J. Ivancovich