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November 4, 2005

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

**Re: California Independent System Operator Corporation  
Docket No. ER05-1501-000**

Dear Secretary Salas:

Enclosed for electronic filing in the above-referenced docket please find the California Independent System Operator Corporation's Motion for Leave to File Answer and Answer to Protests, and Answer to Motions to Intervene and Comments.

Thank you for your assistance in this matter.

Respectfully submitted,

/s/

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/s/

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

**California Independent System                    )                   Docket No. ER05-1501-000  
Operator Corporation                            )**

**MOTION FOR LEAVE TO FILE ANSWER AND ANSWER TO PROTESTS,  
AND ANSWER TO MOTIONS TO INTERVENE AND COMMENTS OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

**I. INTRODUCTION AND SUMMARY.**

On September 22, 2005, the California Independent System Operator Corporation (“CAISO”) submitted for filing with the Federal Energy Regulatory Commission (“the Commission”) its Simplified and Reorganized CAISO Tariff (the “S&R Tariff”). The S&R Tariff is a simplified and reorganized version of the existing ISO Tariff (“Tariff”) and is not intended to substantively change any of the CAISO’s operations, practices, rates, terms, or conditions of service. In response to the S&R Tariff filing, a number of parties submitted comments, protests, and motions to intervene.<sup>1</sup>

Pursuant to Rule 213 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.213 (2005), the CAISO hereby requests leave to file this answer<sup>2</sup> to the

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<sup>1</sup> Motions to intervene, protests and comments concerning the CAISO’s September 22, 2005 S&R Tariff filing were submitted by the following entities: Pacific Gas & Electric (“Amended PG&E”); Citizens Energy Corporations (“Citizens”); Cogeneration Association of California (“CAC”); Transmission Agency of Northern California (“TANC”), Modesto Irrigation District (“MID”), the City of Redding, California (“Redding”), the City of Santa Clara, doing business as Silicon Valley Power (“SVP”), and M-S-R Public Power Agency (“M-S-R”); Northern California Power Agency (“NCPA”); Southern California Edison Company (“SCE”); California Energy Resources Scheduling Division (“CERS”); California Department of Water Resources State Water Project (“DWR”); California Electricity Oversight Board (“CEOB”); Mirant Americas Energy Marketing, LP, Mirant California, LLC, Mirant Delta, LLC, and Mirant Potrero, LLC (collectively, “Mirant”); the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, “Six Cities”); the City of Burbank, California (“Burbank”); the City of Glendale, California (“Glendale”); Turlock Irrigation District (“TID”); Imperial Irrigation District (“IID”); Morgan Stanley Capital Group Inc. (“MSCG”); Williams Power Company (“Williams”); Duke Energy North America, LLC and Duke Energy Marketing America, LLC (collectively, “Duke Energy”); Powerex Corp. (“Powerex”); Sacramento Municipal Utility District (“SMUD”); Metropolitan Water District of Southern California (“Metropolitan”); and Trans-Elect NTD Path 15, LLC (“NTD Path 15”).

<sup>2</sup> The ISO requests waiver of Rule 213(a)(2) (18 C.F.R. § 385.213(a)(2)) to permit it to make an answer to the protests. Good cause for this waiver exists here because the answer will aid the

comments, protests and motions to intervene submitted in the above-referenced docket. The CAISO does not oppose the intervention of any of the parties that have sought leave to intervene in this proceeding.

The S&R Tariff represents a significant undertaking by the CAISO in establishing a more workable ISO Tariff structure for the upcoming MRTU filing. In addition, the S&R Tariff structure will be a useful platform for the CAISO to make additional improvements in 2006. For example, on June 8, 2005 the CAISO Governing Board approved changes to the CAISO's credit policies. In the existing Tariff, the credit-related provisions are dispersed throughout the Tariff. The S&R Tariff has a new section, Section 12, which consolidates the credit-related provisions in one section allowing for a much more straightforward and transparent future amendment to implement the CAISO's new credit policies. The CAISO also recognizes that there is certain "deferred maintenance" in the existing Tariff that has been carried over to the S&R Tariff. One example noted by CAC is the need to conform the Tariff to be consistent with Commission rulings on Qualified Facilities. Other examples of deferred maintenance include unresolved inconsistencies between original Tariff language and language found in the Protocols that have been merged. In some instances, these inconsistencies can be resolved. When they cannot be resolved, original Tariff language should continue to prevail over any merged Protocol language until it is resolved through further Tariff amendment. Additional examples of deferred maintenance relate to anachronisms. The CAISO acknowledges that it has not sought to resolve all these imperfections in the S&R Tariff. The CAISO has pledged to engage in a separate effort to update and conform the ISO Tariff to address these issues.

As discussed in detail below, the Commission should allow the S&R Tariff to go into effect after a brief suspension period, e.g., thirty to sixty days, to allow the Participating Transmission Owners to make conforming changes to their tariffs. The Commission should approve the S&R Tariff with the additional clarifications and

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Commission in understanding the issues in the proceeding, provide additional information to assist the Commission in the decision-making process, and help to ensure a complete and accurate record in this case. See, e.g., *Entergy Services, Inc.*, 101 FERC ¶ 61,289, at 62,163 (2002); *Duke Energy Corporation*, 100 FERC ¶ 61,251, at 61,886 (2002); *Delmarva Power & Light Company*, 93 FERC ¶ 61,098, at 61,259 (2000).

corrections based on the CAISO's response to the comments from intervenors as discussed below. With these additional clarifications and corrections, the S&R Tariff should be deemed to be the legal equivalent of the existing Tariff. The Commission's order accepting the S&R Tariff should accept the S&R Tariff on the basis that it is a simplified and reorganized version of the existing Tariff with the same legal force and effect.

## **II. ANSWER.**

### **A. SMUD's Request That the S&R Tariff Be Rejected Should Be Denied.**

SMUD argues that the S&R Tariff should be rejected because "it will prevent market participants from receiving a black line of the MRTU Tariff against the version of the CAISO Tariff they are familiar with and under which they have historically received service." SMUD at 2-3. SMUD's request should be denied.

As another intervenor, TANC, recognizes "the currently effective conformed CAISO Tariff and Protocols are in need of simplification and reorganization and should be replaced with a more comprehensive tariff structure" and "the MRTU Tariff should be built on the foundation of a pre-existing, clear and organized tariff." TANC, *et al.*, at 11 and 12. Further, PG&E states that the CAISO "has undertaken a monumental task in attempting to reorganize and simplify its existing open-access tariff, and its filing represents a significant and notable achievement." PG&E at 1.

The CAISO agrees with TANC and PG&E as to the need to reform the current Tariff and the importance of not perpetuating the structure that makes the current Tariff so problematic. Moreover, the S&R Tariff will enable the Commission and all market participants to review the MRTU-related provisions without also having to consider the reorganization at the same time.

SMUD seems to imply that the new market design should be applied to the existing ISO Tariff without taking the interim step of simplifying and reorganizing it. No good purpose would be served by this exercise. As explained in the transmittal letter for the S&R Tariff filing, the existing Tariff is based on a bifurcated structure in which the

Protocols, which were not meant to be filed, duplicate, and at times conflict with, other provisions of the Tariff. To perpetuate this unwieldy structure would only increase the disorganized format of the existing Tariff. Thus, the CAISO had a choice of either: (1) engaging in a two-step process where first it proposes the Tariff reorganization and then applies the MRTU changes to the reorganized Tariff; or (2) proposing both the organizational and substantive changes at once.

The CAISO chose the first approach. SMUD would have the Commission mandate the second. The CAISO submits that a blackline of the MRTU-related changes against the current Tariff, as SMUD suggests, containing both restructuring and substantive changes would be far more complex and difficult to understand.

The S&R Tariff is establishing a new platform that corrects the structural errors of the existing document. Intervenors have provided well-considered comments on that restructuring effort and the CAISO will respond in the following section. This process will result in a new conformed Tariff that will provide a foundation for the substantive changes resulting from the new market design. If the CAISO is forced to perform both the restructuring and the substantive changes in the upcoming filing as SMUD proposes, the CAISO, Market Participants, and the Commission will face the difficult task of discerning changes that are merely organizational as well as changes that do modify CAISO markets and operational practices at the same time.

**B. The Commission Should Delay the S&R Tariff's Effective Date For a Reasonable Amount of Time and Grant Waiver of the Filing Requirements for the MRTU Filing.**

PG&E notes that an S&R Tariff effective date of November 21, 2005 leaves insufficient time for PG&E to conform certain of its Tariffs to reflect the organizational changes set forth in the S&R Tariff. PG&E at 7-9. In recognition of the benefits of using the S&R Tariff as the baseline for the MRTU Tariff, PG&E also requests that the Commission grant waiver of Order No. 614 requirements.

The CAISO appreciates PG&E's comments and supports the proposal to suspend the effective date of the S&R Tariff to allow PG&E and other Participating Transmission Owners a reasonable amount of time (30 to 60 days) to conform their

Tariffs to the S&R Tariff, contingent upon the Commission's waiver of the Order No. 614 permitting the CAISO to use the S&R Tariff as the platform for changes proposed by the future MRTU Tariff filing to meet the requirements of 18 C.F.R. §35.10 (c).

While PG&E is correct in stating that there is no substantive change in the S&R Tariff, the CAISO opposes an indefinite delay. The S&R Tariff is an improvement over the existing Tariff, separate and apart from the need to provide a structure for the new market design. Moreover, as noted above, the CAISO intends to make additional Tariff changes during 2006, *e.g.*, to implement credit policies, the new settlement system and timeline, and to address deferred maintenance issues. Accordingly, it is important that the Commission allow the S&R Tariff to become effective within a reasonable time.

In the meantime, granting the Order No. 614 waiver as proposed by PG&E, would allow the CAISO to file the MRTU Tariff based on the S&R Tariff platform and enable the CAISO to realize the objective of allowing the Commission and Market Participants to focus on the substantive MRTU Tariff-related changes without spending additional resources on questions that result only from reorganization.

**C. The Commission Should Accept the S&R Tariff as a Replacement of the Existing Tariff.**

Metropolitan requests that the Commission accept the S&R Tariff as an informational filing only, as it asserts that the "significant effort" involved in resolving MRTU Tariff issues hindered stakeholders' ability to review the S&R Tariff text. Metropolitan at 8-9. As noted in the prior sections, it is important that the Commission accept the S&R Tariff as a replacement for the current Tariff, eliminating the need to keep two sets of Tariff sheets and allowing the CAISO, stakeholders and the Commission to work only with the new Tariff structure. Any concern that the CAISO may have inadvertently changed the substance of the Tariff can be addressed by the Commission's order accepting the S&R Tariff only as a simplified and reorganized version of the existing ISO Tariff.

**D. Section-Specific Issues Relating to Interpretation, the Existing Tariff, Organization, Clarity and Typographical or Other Minor Errors.**

The CAISO greatly appreciates the care and effort intervenors undertook to review the S&R Tariff. The comments fall into several categories: (1) concerns reflecting problems with the existing Tariff; (2) the integration of Protocols into the Tariff; and (3) typographical and other minor errors.

The CAISO will address on a section-by-section basis the comments filed with the Commission. With respect to the first category of concerns – problems with the existing Tariff language, as noted above, the CAISO deliberately did not seek to make corrections or changes at this time and has pledged to address many of these concerns in 2006.

**1. Section 4.5.1.2.2.1**

TANC and NCPA express concerns that when the language in S&R Tariff Section 4.5.1.2.2.1 was moved from the Scheduling Coordinator Application Protocol (“SCAP”), the term “ISO Controlled Grid” was changed to “ISO Balancing Authority Area.” TANC, *et al.*, 13-14; NCPA at 4. TANC and NCPA are correct. The change was unintended – the language should not have been modified from “ISO Controlled Grid.”<sup>3</sup> Accordingly, 4.5.1.2.2.1 should read as follows:

**4.5.1.2.2.1 Failure to Promptly Report a Material Change.**

If a Scheduling Coordinator fails to inform the ISO of a material change in its information provided to the ISO, which may affect the reliability or safety of the ISO ~~Balancing Authority Area~~ **Controlled Grid**, or the financial security of the ISO, the ISO may suspend or terminate the Scheduling Coordinator’s rights under the ISO Tariff in accordance with the terms of ISO Tariff Sections 12.3 and 4.5.1 respectively. If the ISO intends to terminate the Scheduling Coordinator’s rights it shall file a Notice of Termination with FERC. Such termination shall be effective upon acceptance by FERC of a Notice of Termination.

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<sup>3</sup> At one point, the CAISO had considered making additional changes to the Tariff, including using the term “CAISO Balancing Authority Area” and making other corrections. Once it became clear that the simplification and reorganization process was itself a major undertaking, the CAISO decided to limit the changes to the S&R Tariff to just the simplification and reorganization.

**2. Section 4.5.3.2**

PG&E contends that the term “interconnection schedules” is vague and that Appendix A should include a definition that is consistent with the use of the term in the current Dispatch Protocol (“DP”). Amended PG&E at 12-13. The CAISO does not necessarily oppose PG&E’s contention. In preparing the S&R Tariff, however, the CAISO deliberately avoided making such substantive changes to the existing Tariff. Instead, here the CAISO combined the first sentence of DP 3.3 with Tariff Section 2.2.6.2, a strictly organizational change. In doing so, the CAISO did not eliminate or change any existing definition of “interconnection schedules.” Such a change would be beyond the scope of the S&R Tariff.

**3. Section 4.5.3.7**

Powerex requests that the CAISO modify Section 4.5.3.7 to make explicit that only Scheduling Coordinators that serve load must submit demand forecasts. Powerex at 6-7. As proposed in the S&R Tariff, Section 4.5.3.7 accurately tracks the existing Tariff language of Section 2.2.6.8. While the CAISO appreciates Powerex’s comment, this would go beyond simplification and reorganization.

**4. Section 4.5.4.2**

Powerex asserts that the CAISO should modify Section 4.5.4.2 to reflect that in practice the CAISO does not adjust imports or exports for Transmission Losses. Powerex at 7. Again, while the CAISO appreciates Powerex’s comment, the purpose of the S&R Tariff is limited to the simplification and reorganization of the existing Tariff. The language in Section 4.5.4.2 was taken directly and without modification from the existing Scheduling Protocol (“SP”) 3.1.1 and existing Tariff Section 2.2.7.2.

**5. 4.6.1.1(i) & (ii)**

PG&E states that Sections 4.6.1.1(i) & (ii) should read “Participating Generator” instead of “Generator.” Amended PG&E at 11-12. While the term “Generator” is what is used in the current DP 3.7.1 and DP 3.7.2, the source of S&R Tariff Section 4.6.1.1. (i) and (ii), the CAISO does not object to this non-substantive correction. The amended Section 4.6.1.1 is as follows:



#### 4.6.1.1 Operate Pursuant to Relevant Provisions of ISO Tariff.

Participating Generators shall operate, or cause their facilities to be operated, in accordance with the relevant provisions of this ISO Tariff, including, but not limited to, the operating requirements for normal and emergency operating conditions specified in Section 7 and the requirements for the dispatch and testing of Ancillary Services specified in Section 8.

(i) Each **Participating** Generator shall immediately inform the ISO, through its respective Scheduling Coordinator, of any change or potential change in the current status of any Generating Units that are under the Dispatch control of the ISO. This will include, but not be limited to, any change in status of equipment that could affect the maximum output of a Generating Unit, the minimum load of a Generating Unit, the ability of a Generating Unit to operate with automatic voltage regulation, operation of the PSSs (whether in or out of service), the availability of a Generating Unit governor, or a Generating Unit's ability to provide Ancillary Services as required. Each **Participating** Generator shall immediately report to the ISO, through its Scheduling Coordinator any actual or potential concerns or problems that it may have with respect to Generating Unit direct digital control equipment, Generating Unit voltage control equipment, or any other equipment that may impact the reliable operation of the ISO Controlled Grid.

(ii) In the event that a **Participating** Generator cannot meet its Generation schedule, whether due to a Generating Unit trip or the loss of a piece of equipment causing a reduction in capacity or output, the **Participating** Generator shall notify the ISO, through its Scheduling Coordinator at once. If a **Participating** Generator will not be able to meet a time commitment or requires the cancellation of a Generating Unit start up, it shall notify the ISO, through its Scheduling Coordinator at once.

## 6. Section 6.6

PG&E objects to the manner in which the CAISO integrated the existing Schedules and Bids Protocol ("SBP") 7.5 with the existing Tariff Section 6.4 into the new proposed S&R Tariff Section 6.6, stating that the CAISO replaced controlling Tariff language that required the CAISO to maintain a back-up system in case of failure with previously non-controlling Protocol language not requiring such a system. Amended PG&E at 10-11. The CAISO accepts PG&E's comments and proposes to delete SBP 7.5 as being superseded by the existing Tariff Section 6.4, thus the S&R Tariff would show the following:

### 6.6 {6.4} Failure or Corruption of the WEnet.

The ISO shall, in consultation with Scheduling Coordinators, make provision for procedures to be implemented in the event of a total or partial failure of WEnet or the material corruption of data on WEnet and include these procedures in the ISO Protocols. The ISO shall ensure that such alternative communications systems are tested periodically.

## 7. Section 7.1.3(f)

DWR states that Section 7.1.3(f) contains repetition of the term “dispatch” and that there seems to be no difference between Sections 7.1.3(f)(i) and 7.1.3(f)(ii). DWR is correct. The repetition of the term “dispatch” was unintended. Further, the duplication between (i) and (ii) resulted from the CAISO’s decision to err on the side of inclusion when merging Protocol provisions into the Tariff so as to prevent substantive changes. Here, however, the CAISO agrees that (ii) can be deleted without resulting in any substantive change. Accordingly, Section 7.1.3(f) should read as follows:

- (f) **dispatch:** ~~(i) Dispatch Curtailable Demand which has been scheduled to provide Non-Spinning Reserve or Replacement Reserve, or (ii) Loads through direct Load control or other means at the ISO’s discretion that are curtailable as an Ancillary Service;~~

## 8. Section 7.4.11.2

PG&E notes that the last two sentences of S&R Tariff Section 7.4.11.2 are duplicative. Amended PG&E at 14. The CAISO agrees. Again, this is a result of the CAISO’s decision to err on the side of inclusion when merging Protocol provisions into the Tariff so as to prevent substantive changes. Accordingly, the imported sentence from DP 10.4.2 can be deleted as redundant with existing Tariff Section 2.3.2.8.2 and the resulting Section 7.4.11.2 is as follows:

### 7.4.11.2 Load Curtailment.

A Scheduling Coordinator may specify that Loads will be reduced at specified Market Clearing Prices or offer the right to exercise Load curtailment to the ISO as an Ancillary Service or utilize Load curtailment itself (by way of self-provision of Ancillary Services) as Non-Spinning Reserve or Replacement Reserve. The ISO, at its discretion, may require direct control over such Curtailable Demand to assume response capability for managing System Emergencies. However, non-firm Loads shall not be eligible to provide Curtailable Demand if they are receiving incentives for interruption under existing programs approved by a Local Regulatory Authority, unless: a) participation in the ISO’s Ancillary Services markets is specifically authorized by such Local Regulatory Authority, and b) there exist no contingencies on the availability, nor any unmitigated incentives encouraging prior curtailment, of such interruptible Load for Dispatch as Curtailable Demand as a result of the operation of such existing program. The ISO may establish standards for automatic communication of curtailment instructions to implement Load curtailment as a condition for accepting any offered Load curtailment as an Ancillary Service.

~~The ISO may establish standards for automatic communication of curtailment instructions to implement Load curtailment as a condition for accepting any offered Curtailable Demand as an Ancillary Service.~~

## 9. Section 8.2.3.4

PG&E states that Section 8.2.3.4 should read “Participating Generator” instead of “Generator.” Amended PG&E at 11-12. The CAISO does not object to this clarification. The amended Section 8.2.3.4 is as follows:

### 8.2.3.4 Voltage Support.

The ISO shall determine on an hourly basis for each day the quantity and location of Voltage Support required to maintain voltage levels and reactive margins within WECC and NERC criteria using a power flow study based on the quantity and location of scheduled Demand. The ISO shall issue daily voltage schedules (Dispatch instructions) to **Participating** Generators, Participating TOs and UDCs, which are required to be maintained for ISO Controlled Grid reliability. All other Generating Units shall comply with the power factor requirements set forth in contractual arrangements in effect on the ISO Operations Date, or, if no such contractual arrangements exist and the Generating Unit exists within the system of a Participating TO, the power factor requirements applicable under the Participating TO's TO Tariff or other tariff on file with the FERC.

All Participating Generators shall maintain the ISO specified voltage schedule at the transmission interconnection points to the extent possible while operating within the power factor range specified in their interconnection agreements or, for Regulatory Must-Take Generation, Regulatory Must-Run Generation and Reliability Must-Run Generation consistent with existing obligations. For Generating Units, that do not operate under one of these agreements, the minimum power factor range will be within a band of 0.90 lag (producing VARs) and 0.95 lead (absorbing VARs) power factors. Participating Generators with Generating Units existing at the ISO Operations Date that are unable to meet this operating power factor requirement may apply to the ISO for an exemption. Prior to granting such an exemption, the ISO shall require the Participating TO or UDC to whose system the relevant Generating Units are interconnected to notify it of the existing contractual requirements for Voltage Support established prior to the ISO Operations Date for such Generating Units. Such requirements may be contained in CPUC Electric Rule 21 or the Interconnection Agreement with the Participating TO or UDC. The ISO shall not grant any exemption under this Section from such existing contractual requirements. The ISO shall be entitled to instruct Participating Generators to operate their Generating Units at specified points within their power factor ranges. **Participating** Generators shall receive no compensation for operating within these specified ranges.

If the ISO requires additional Voltage Support, it shall procure this either through Reliability Must-Run Contracts or, if no other more economic sources are available by instructing a Generating Unit to move its MVar output outside its mandatory range. Only if the Generating Unit must reduce its MW output in order to comply with such an instruction will it be compensated in accordance with Section 8.5.9.

All Loads directly connected to the ISO Controlled Grid shall maintain reactive flow at grid interface points within a specified power factor band of 0.97 lag to 0.99 lead. Loads shall not be compensated for the service of maintaining the power factor at required levels within the bandwidth. A UDC interconnecting with the ISO Controlled Grid

at any point other than a Scheduling Point shall be subject to the same power factor requirement.

The power factor for both the Generating Units and Loads shall be measured at the interconnection point with the ISO Controlled Grid. The ISO will develop and will be authorized to levy penalties against Participating Generators, UDCs or Loads whose Voltage Support does not comply with the ISO's requirements. The ISO will establish voltage control standards with UDCs and the operators of other Control Areas and will enter into operational agreements providing for the coordination of actions in the event of a voltage problem occurring.

Wheeling Through and Wheeling Out transactions may also be subject to a reactive charge as developed by the ISO. If the ISO shall determine that a reactive charge should be payable at a future date, it shall, subject to FERC acceptance and approval, publish annually the Voltage Support obligations and applicable charges for Wheeling Through and Wheeling Out transactions at Scheduling Points. The obligations shall be predetermined by the ISO based on the estimated amount of the Wheeling Through and Wheeling Out transactions each year.

#### **10. Section 8.4.6**

Powerex requests that the CAISO modify Section 8.4.6 to reflect the fact that System Resources do not have traditional meters by inserting the term "interchange data." Powerex at 7-9. As proposed in the S&R Tariff, Section 8.4.6 accurately incorporates the existing Tariff language from Section 2.5.6.3 that does not include such a clarification. While the CAISO appreciates Powerex's comment and agrees that the CAISO should consider amending the Tariff to reflect current practices, this change would go beyond the scope of the S&R Tariff.

#### **11. Section 8.5.4<sup>4</sup>**

PG&E requests that the CAISO define "technical requirements" as set forth in Section 8.5.4(f). Amended PG&E at 13. The CAISO disagrees. PG&E accurately notes that the source of S&R Tariff Section 8.5.4(f) is SP 9.1(c), which refers to "technical requirements as defined in the ASRP." There is no such definition of "technical requirements" in the existing Ancillary Services Requirements Protocol ("ASRP"). Accordingly, the S&R Tariff likewise does not contain a definition of "technical requirements." Such a definition would be beyond the scope the S&R Tariff.

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<sup>4</sup> In its Amended Motion to Intervene and Protest, PG&E refers to the term "technical requirements" in Section 8.5.3.2(f). PG&E at 13. Given that Section 8.5.3.2(f) does not exist, the CAISO assumes that PG&E meant to refer to Section 8.5.4(f), which does contain the term "technical requirements."

## 12. Section 8.10B and 8.10.1.2

DWR states that Sections 8.10B and 8.10.1.2 contain duplicative first sentences and should be consolidated as appropriate. DWR at 4. The CAISO agrees. In order to eliminate Protocol-Tariff redundancy, one of the primary goals of the S&R Tariff, the relevant sections will be amended as follows:

~~8.10B Compliance Testing for Spinning Reserve. The ISO may test the capability of any Generating Unit, System Unit or external import of a System Resource providing Spinning Reserve by issuing unannounced Dispatch instructions requiring the Generating Unit, System Unit or external import of a System Resource to ramp up to its stated ten minute capability in accordance with the Scheduling Coordinator's Bid. Such tests may not necessarily occur on the hour. The ISO shall measure the response of the Generating Unit, System Unit or external import of a System Resource to determine compliance with its stated capabilities. [First and third sentences deleted as redundant with new Section 8.10.1.2; second sentence added to Section 8.10.1.2]~~

**8.10.1.2 Spinning Reserve.** The ISO shall test the Spinning Reserve capability of a Generating Unit, System Unit or System Resource by issuing unannounced Dispatch instructions requiring the Generating Unit, System Unit or System Resource to ramp up to its ten minute capability. The ISO shall measure the response of the Generating Unit, System Unit or System Resource to determine compliance with requirements. **Such tests may not necessarily occur on the hour. [ASRP 9.2]** The Scheduling Coordinator for the Generating Unit, System Unit or System Resource shall be paid the Energy Bid price of the Generating Unit or System Unit for the output under the Spinning Reserve test.

## 13. Section 9.1

TANC notes that Section 9.1 contains an inaccurate cross reference to Section 2.3.3. TANC, *et al.*, at 20. The CAISO agrees. The cross reference should have been modified to refer to Section 9.3 rather than Section 2.3.3. Accordingly, Section 9.1 should read as follows:

### 9.1 Coordination and Approval for Outages.

The ISO shall have authority to coordinate and approve Outages and returns to service of all facilities comprised in the ISO Controlled Grid and Reliability Must-Run Units in accordance with Section ~~9.3 2.3.3~~. The ISO will coordinate and approve Maintenance Outages and coordinate responses to Forced Outages of all transmission facilities in the ISO Controlled Grid and Reliability Must-Run Units in accordance with this Section 9. Any scheduled Outages that are cancelled by ISO real-time operations due to system requirements must be rescheduled with the ISO Outage Coordination Department in accordance with Section 9.3.

#### 14. Section 9.3.4

PG&E states that discussion of the single point of contact issue should be separate from the discussion of how the CAISO intends to handle outages for regulatory Must-Take generation instead of combined as in Section 9.3.4. Amended PG&E at 14. The CAISO agrees. One of the goals of the S&R Tariff was to merge Protocols into the Tariff where similar issues are addressed. If the merger in Section 9.3.4 instead creates confusion, then Outage Coordination Protocol (“OCP”) 2.1 and 4.1 should be removed from Section 9.3.4 and added as a new Section 9.3.6.

##### 9.3.4 Single Point of Contact.

~~Requests for approvals and coordination of all Maintenance Outages (consistent with Section 9.3.1) will be through a single point of contact between the ISO Outage Coordination Office and each Operator. The Operator shall provide in its initial request and specify from time to time the identification of the single point of contact along with primary and alternate means of communication pursuant to the detailed procedures referred to in Section 9.3.6. Information regarding planned outages for resources providing Regulatory Must-Take Generation shall be provided to the ISO Outage Coordination Office by the Participating TO or UDC having an existing contract with such resource or by a Participating Generator. Information provided will be that obtained by the Participating TO, UDC or a Participating Generator pursuant to the terms of the existing agreement with the Regulatory Must-Take Generation resource or as requested by the ISO. Scheduling and approvals of Maintenance Outages for resources providing Regulatory Must-Take Generation shall continue to be coordinated as detailed in the applicable contract with the Participating TO or UDC, provided the Regulatory Must-Take Generator has not executed a Participating Generator Agreement. If the Regulatory Must-Take Generator has executed a Participating Generator Agreement, it shall comply with Section 9.3.5 and other provisions applicable to Participating Generators.~~

**9.3.6 *Information regarding planned outages for resources providing Regulatory Must-Take Generation shall be provided to the ISO Outage Coordination Office by the Participating TO or UDC having an existing contract with such resource or by a Participating Generator. Information provided will be that obtained by the Participating TO, UDC or a Participating Generator pursuant to the terms of the existing agreement with the Regulatory Must-Take Generation resource or as requested by the ISO. Scheduling and approvals of Maintenance Outages for resources providing Regulatory Must-Take Generation shall continue to be coordinated as detailed in the applicable contract with the Participating TO or UDC, provided the Regulatory Must-Take Generator has not executed a Participating Generator Agreement. If the Regulatory Must-Take Generator has executed a Participating Generator Agreement, it shall comply with Section 9.3.5 and other provisions applicable to Participating Generators.***

#### 15. Section 9.3.5

PG&E states that Section 9.3.5 should indicate that the “Method of Communication” specifically relates to maintenance & outage planning in order to be

consistent with the context of the language in its original location, OCP 7.2. Amended PG&E at 15. The CAISO agrees. In order to accurately capture the original context of OCP 7.2, Section 9.3.5 should read as follows:

**9.3.5 Method of Communications.**

The primary method of communication from an Operator to the ISO **with regard to maintenance and outage planning** will be as described in the Operating Procedure on the ISO Home Page. Emergency capabilities, to be used only as a back-up if the primary communication method is unavailable, will include:

- (a) voice;
- (b) fax; and
- (c) electronic (E-mail, FTP file, etc.).

PG&E also states that the general reference to “Operating Procedure on the ISO Home Page” in Section 9.3.5 is not specific enough given that there are multiple links to documents entitled “Operating Procedure” on the CAISO’s web page. The detail PG&E suggests, however, does not currently exist in the OCP. Adding such detail would be beyond the scope of the S&R Tariff.

**16. Section 9.3.6**

PG&E states that Section 9.3.6 should be clarified to refer to Generating Units of Participating Generators. Amended PG&E at 11-12. The CAISO agrees. In order to accurately capture the original context of OCP 2.2.1, Section 9.3.6 should read as follows:

**9.3.6 Maintenance Outage Planning.**

Each Operator shall, by not later than October 15 each year, provide the ISO with a proposed schedule of all Maintenance Outages it wishes to undertake in the following year. The proposed schedule shall include all of the Operator’s transmission facilities that comprise the ISO Controlled Grid and Participating Generators (including its Reliability Must-Run Units). In the case of a Participating TO’s transmission facilities, that proposed schedule shall be developed in consultation with the UDCs interconnected with that Participating TO’s system and shall take account of each UDC’s planned maintenance requirements. The nature of the information to be provided and the detailed Maintenance Outage Planning Procedure shall be established by the ISO. This information shall include:

The following information is required for each Generating Unit **of a Participating Generator**:

- (a) the Generating Unit name and Location Code;
- (b) the MW capacity unavailable;

- (c) the scheduled start and finish date for each Outage; and
- (d) where there is a possibility of flexibility, the earliest start date and the latest finish date, along with the actual duration of the Outage once it commences.

The following information is required for each transmission facility:

- (a) the identification of the facility and location;
- (b) the nature of the proposed Maintenance Outage;
- (c) the preferred start and finish date for each Maintenance Outage; and
- (d) where there is a possibility of flexibility, the earliest start date and the latest finish date, along with the actual duration of the Outage once it commences.

Either the ISO, pursuant to Section 9.3.7, or an Operator, subject to Section 9.3.6.10, may at any time request a change to an Approved Maintenance Outage. An Operator may, upon seventy-two (72) hours advance notice, schedule with the ISO Outage Coordination Office a Maintenance Outage on its system, subject to the conditions of Sections 9.3.6.4A, 9.3.6.7, and 9.3.6.8.

## **17. Section 9.3.6.8**

TANC states that Section 9.3.6.8 contains an inaccurate cross reference to Section 9.3.3.7. TANC, *et al.*, at 20. The CAISO agrees. The cross reference should have been modified to refer to Section 9.3.7 rather than Section 9.3.3.7. Accordingly, Section 9.3.6.8 should read as follows:

**9.3.6.8** Where, in the reasonable opinion of the ISO Outage Coordination Office, the requested Maintenance Outage or requested change to an Approved Maintenance Outage is likely to have a detrimental effect on the efficient use and reliable operation of the ISO Controlled Grid, the ISO Outage Coordination Office may reject the requested Maintenance Outage or requested change to Approved Maintenance Outage. If in the ISO's determination, any of the Maintenance Outages would cause the ISO to violate the Applicable Reliability Criteria, the ISO will notify the relevant Operator, and the Operator will then revise the proposed Maintenance Outage and inform the ISO of the proposed changes. The ISO Outage Coordination Office shall, in a rejection notice, identify the ISO's reliability, security and market concerns which prompt the rejection and suggest possible remedies or schedule revisions which might mitigate any such concerns. The ISO Outage Coordination Office may provide each Operator in writing with any suggested amendments to those Maintenance Outage requests rejected by the ISO Outage Coordination Office. Any such suggested amendments will be considered as an ISO maintenance request and will be approved in accordance with the process set forth in Section ~~9.3.7~~ ~~9.3.3.7~~ of the ISO Tariff. The determination of the ISO Outage Coordination Office shall be final and binding on the Operator. If, within fourteen (14) days of having made its determination, the Operator requests the ISO Outage Coordination Office to provide reasons for its determination, it shall do so as soon as is reasonably practicable. The ISO will give reasons for informational purposes only and without affecting in any way the finality or validity of the determination.



**18. Section 11.2.4.1.2(h)**

PG&E questions the meaning of the term “UDPAP” as used in the bracketed notes in the blacklined version of the S&R Tariff. Amended PG&E at 13. The term “UDPAP” is an abbreviation for “Uninstructed Deviation Penalty Aggregation Protocol,” the majority of which has been transferred to Appendix R of the S&R Tariff. The first bracketed note in Section 11.2.4.1.2(h), for instance, indicates that the previous sentence was removed as redundant with the Uninstructed Deviation Penalty Aggregation Protocol Sections 3.1.1 and 3.1.2(2)(c).

**19. Section 11.2.11.1**

DWR notes that Section 11.2.11.1 appears to be misnumbered. DWR at 4-5. The CAISO agrees. The existing Tariff Section 11.2.11 was deleted as an unnecessary cross reference to Section 7.5,<sup>5</sup> but its subsections were never adjusted accordingly. The relevant sections of the S&R Tariff should be adjusted according to the following table:

<b>Misnumbered Section Numbers in S&amp;R Tariff</b>	<b>Corrected Section Numbers</b>
11.2.11.1	11.2.11
11.2.11.1.1	11.2.11.1
11.2.11.1.2	11.2.11.2
11.2.11.2	11.2.12
11.2.11.3	11.2.13
11.2.11.3.1	11.2.13.1
11.2.11.3.2	11.2.13.2

<sup>5</sup> Existing Tariff Section 11.2.11, FERC Annual Charge Recovery Rate, states: “The ISO shall calculate and levy the rates for recovery of FERC Annual Charges in accordance with Section 7.5 of this ISO Tariff.” This section has been deleted as an unnecessary cross reference because existing Tariff Sections 7.5.1 through 7.5.4 have been moved to S&R Tariff Sections 11.2.11.1 through 11.2.11.4.

11.2.11.3.3	11.2.13.3
11.2.11.3.4	11.2.13.4
11.2.11.4	11.2.14
11.2.12	11.2.15
11.2.13	11.2.16
11.2.14	11.2.17
11.2A	11.2.18

As a result of the section number changes above, the cross references in the following three sections will be adjusted as follows:

**11.2.11.3.2**

(d) any positive or negative balances of funds collected for FERC Annual Charges in a previous year after all invoices for FERC Annual Charges for that year have been paid by the ISO, other than those that are addressed through the mechanism described in Section ~~11.2.13.4~~ ~~11.2.14.3.4~~.

**11.2.11.3.4** If the FERC Annual Charges assessed by FERC against the ISO for transactions on the ISO Controlled Grid during any year exceed or fall short of funds collected by the ISO for FERC Annual Charges with respect to that year by a range of 10% or less, the ISO shall take such under- or over-recovery into account through an adjustment to the FERC Annual Charge Recovery Rate in accordance with Section ~~11.2.13.2~~ ~~11.2.14.3.2~~. Any deficiency of available funds necessary to pay for any assessment of FERC Annual Charges payable by the ISO may be covered by an advance of funds from the ISO's Grid Management Charge, provided any such advanced funds will be repaid. If the ISO's collection of funds for FERC Annual Charges with respect to any year results in an under- or over-recovery of greater than 10%, the ISO shall either assess a surcharge against all active Scheduling Coordinators for the amount under-recovered or shall issue a credit to all active Scheduling Coordinators for the amount over-recovered. Such surcharge or credit shall be allocated among all active Scheduling Coordinators based on the percentage of each active Scheduling Coordinators metered Demand and exports during the relevant year. For purposes of this section, an "active Scheduling Coordinator" shall be a Scheduling Coordinator certified by the ISO in accordance with Section 4.5.1 of this ISO Tariff at the time the ISO issues a surcharge or credit under this section. The ISO will issue any surcharges or credits under this section within 60 days of receiving a FERC Annual Charge assessment from the FERC.

**11.2.11.4 Credits and Debits of FERC Annual Charges Collected from Scheduling Coordinators.**

In addition to the surcharges or credits permitted under Sections ~~11.2.13 11.2.11.3~~ or 11.6.3.3 of this ISO Tariff, the ISO shall credit or debit, as appropriate, the account of a Scheduling Coordinator for any over- or under-assessment of FERC Annual Charges that the ISO determines occurred due to the error, omission, or miscalculation by the ISO or the Scheduling Coordinator.

**20. Section 11.4.2**

DWR states that the CAISO has not explained the deletion of Section 11.4.2. DWR at 5. The CAISO agrees that this was an error and that the existing Tariff Section 11.4.2 should be restored.

**21. Section 11.6.1.1**

DWR states that the CAISO has not explained the deletion of the 38-day deadline for submitting a Preliminary Settlement Statement to a Scheduling Coordinator from Section 11.6.1.1. DWR at 5-6. While the CAISO was attempting to reconcile Section 11.6.1.1 with SABP Section 4.1.1, which states that the Preliminary Statement will be provided in accordance with the CAISO Payments calendar, it does not object to restoring this deadline and will modify Section 11.6.1.1 as follows:

**11.6.1.1 Preliminary Statements.**

The ISO shall provide to each Scheduling Coordinator, Black Start Generator or Participating TO for validation a Preliminary Settlement Statement for each Trading Day ~~in accordance with~~ ***within thirty-eight (38) Business Days of the relevant Trading Day, covering all Settlement Periods in that Trading Day*** ~~the ISO Payments Calendar.~~ Each Preliminary Settlement Statement will include a statement of:

- (a) the amount payable or receivable by the Scheduling Coordinator, Black Start Generator or Participating TO for each charge referred to in Section 11.2 for each Settlement Period in the relevant Trading Day;
- (b) the total amount payable or receivable by that Scheduling Coordinator, Black Start Generator or Participating TO for each charge for all Settlement Periods in that Trading Day after the amounts payable and the amounts receivable under (a) have been netted off pursuant to Section 11.3; and
- (c) the components of each charge in each Settlement Period except for information contained in the Imbalance Energy Report referred to in Section 11.6.1.1.

Each Preliminary Settlement Statement shall also be accompanied by a breakdown of the components of the Imbalance Energy Charge (the "Imbalance Energy Report").

## **22. Section 16.2**

PG&E asserts that the organization and content of Section 16.2 is confusing. Amended PG&E at 15. Specifically, PG&E states that existing Tariff SP 7.2.1, which was moved to S&R Tariff Section 23, is too far removed from the rest of existing Tariff SP 7, which was moved to S&R Tariff Section 16.1.2 and 16.2. Amended PG&E at 15. The CAISO disagrees. Existing Tariff SP 7.2.1, Categories of Transmission Capacity, has been appropriately placed under Article II, Transmission Service.

## **23. Section 16.2.3.1 and Section 16.2.3.1.1**

PG&E states that Section 16.2.3.1 conflicts with Section 16.2.3.1.1 in its treatment of the submission of operating instructions to the ISO and the process of designating a Responsible Participating TO. Amended PG&E at 15-16. The CAISO disagrees. Section 16.2.3.1 states that, unless the parties agree otherwise, the party providing transmission service, the Responsible Participating TO, will submit transmission rights/curtailment instructions to the CAISO. If more than one party provides transmission service, then the relevant Participating TOs will designate a single Responsible Participating TO and notify the CAISO (or the CAISO will do so for them).

Rather than conflicting with these requirements, Section 16.2.3.1.1 provides another layer of detail to specifically address operating instructions and designation of a Participating TO *in the event the parties cannot agree upon operating instructions*. For instance, should the parties disagree over the operating instructions, Section 16.2.3.1.1 requires the CAISO to implement the Participating TO's operating instructions. Further, if both parties are Participating TOs *and the parties cannot agree to the operating instructions*, the CAISO shall implement the operating instructions of the first Participating TO for which the Existing Contract is an Encumbrance until the dispute is resolved.

As to PG&E's comment that the two sections are slightly redundant, the CAISO agrees, and the following amendment should be made accordingly:

**16.2.3.1** For the purposes of Section 16.2, Existing Rights fall into one of three general categories: firm transmission service, non-firm transmission service, and

conditional firm transmission service. The parties to an Existing Contract shall notify the ISO which Existing Rights fall into each category, through the operating instructions described in this section and in Section 16.2.4A.

- (i) For each Existing Contract, the party providing transmission service (the "Responsible PTO") shall be responsible for the submission of transmission rights/curtailment instructions to the ISO on behalf of the holders of Existing Rights, unless the parties to the Existing Contract agree otherwise. For the purposes of this ISO Tariff, such otherwise agreed party will be acting in the role of Responsible PTO.
- (ii) ~~In accordance with the ISO Tariff, the parties to Existing Contracts will attempt to jointly develop and agree on any instructions that will be submitted to the ISO.~~ [Redundant with Section 16.2.3.1.1, second sentence] To the extent there is more than one Participating TO providing transmission service under an Existing Contract or there is a set of Existing Contracts which are interdependent from the point of view of submitting instructions to the ISO involving more than one Participating TO, the relevant Participating TOs will designate a single Participating TO as the Responsible PTO and will notify the ISO accordingly. If no such Responsible PTO is designated by the relevant Participating TOs or the ISO is not notified of such designation, the ISO shall designate one of them as the Responsible PTO and notify the relevant Participating TOs accordingly.
- (iii) The parties to an Existing Contract shall also be responsible to submit to the ISO any other necessary operating instructions based on their contract interpretations needed by the ISO to enable the ISO to perform its duties.

**16.2.3.1.1** The ISO will have no role in interpreting Existing Contracts. The parties to an Existing Contract will, in the first instance, attempt jointly to agree on any operating instructions that will be submitted to the ISO. In the event that the parties to the Existing Contract cannot agree upon the operating instructions submitted by the parties to the Existing Contract, the dispute resolution provisions of the Existing Contract, if applicable, shall be used to resolve the dispute; provided that, until the dispute is resolved, and unless the Existing Contract specifies otherwise, the ISO shall implement the Participating TO's operating instructions. If both parties to an Existing Contract are Participating TOs and the parties cannot agree to the operating instructions submitted by the parties, until the dispute is resolved, and unless the Existing Contract specifies otherwise, the ISO shall implement the operating instructions of the first Participating TO for which the Existing Contract is an Encumbrance.

#### **24. Section 16.2.3.4**

Without explanation, PG&E requests that the CAISO insert "and Section 16.2.4A" after the phrase "in accordance with Section 16.2.3.1" in S&R Tariff Section 16.2.3.4. While the CAISO appreciates the comment and presumably the effort to improve the thoroughness of the cross reference, such detail does not appear in the existing Tariff Section 2.4.4.4.4 from which S&R Tariff Section 16.2.3.4 was transferred, and the CAISO does not believe that the change is necessary or within the scope of the S&R Tariff.

## 25. Section 16.2.3.4.5

TANC, NCPA, and PG&E note that the merger of SP 9.9 and SP 4.3 into existing Tariff Section 2.4.4.4.5, which is now S&R Tariff Section 16.2.3.4.5, does not capture the existing CAISO Tariff's requirement that Participating TOs are responsible for differences in assignment of Transmission Losses. TANC, *et al.*, at 15-17; NCPA at 4-6; Amended PG&E at 17. The CAISO agrees. The requirement was inadvertently left out of S&R Tariff Section 16.2.3.4.5, and it should be amended as requested by PG&E:

**16.2.3.4.5** Parties with Existing Rights shall continue to pay for Transmission Losses or Ancillary Services requirements in accordance with such Existing Contracts as they may be modified or changed in accordance with the terms of the Existing Contract. Likewise the Participating TOs shall continue to provide Transmission Losses and any other Ancillary Services to the holder of the rights under an Existing Contract as may be required by the Existing Contracts. To the extent that Transmission Losses or Ancillary Service requirements associated with Existing Rights are not the same as those under the ISO's rules and protocols, the ISO will not charge or credit the Participating TO for any cost differences between the two, but will provide the parties to the Existing Contracts with details of its Transmission Losses and Ancillary Services calculations to enable them to determine whether the ISO's calculations result in any associated shortfall or surplus and to enable the parties to the Existing Contracts to settle the differences bilaterally or through the relevant TO Tariff. Each Participating TO will be responsible for recovering any deficits or crediting any surpluses associated with differences in assignment of **Transmission Loss Requirements and Ancillary Services** requirements, through its bilateral arrangements or its Transmission Owner's Tariff.

## 26. Section 16.2.4

PG&E requests that the CAISO capitalize "tariff" in Section 16.2.4. Amended PG&E at 18. The CAISO agrees. The terms "ISO rules and protocols" and "Scheduling Protocol" were inadvertently replaced with "ISO tariff" rather than "ISO Tariff," and the section should be amended accordingly:

### **16.2.4 ISO Protocols Shall Accommodate Existing Rights.**

The ISO will implement the provisions of Section 16.2.3. The objective will be to ensure that under the ISO ~~T~~tariff, Existing Rights will enjoy the same relative priorities vis-à-vis new, ISO-provided transmission uses, as they would under the Existing Contracts and the FERC Order 888 tariffs. Under the ISO ~~T~~tariff:

## 27. Section 16.2.4A

PG&E states that Section 16.2.4A should read “in accordance with the terms of this Section 16.2.4A and Section 16.2.3.1” rather than “in accordance with the terms of Section 16.2.3.1.1.” Amended PG&E at 18. The CAISO disagrees. S&R Tariff Section 16.2.4A is identical to existing Tariff Section 2.4.4.5.1.1 with the exception of an accurately updated reference to S&R Tariff Section 16.2.3.1.1, which was originally existing Tariff Section 2.4.4.4.1.1. The proposed change would, thus, be beyond the scope of the S&R Tariff.

## 28. Section 16.2.4A.1

TANC seeks clarification as to why the first sentence of SBP 3.3.1 was deleted rather than added to Section 16.2.4A.1. TANC, *et al.*, at 17-19. While this language is arguably covered by 16.2.3.1, the CAISO agrees to add the sentence back into 16.2.4A.1.

TANC also requests a cross-reference to the term “Standard Template – Transmission Rights/Curtailment Instructions.” TANC, *et al.*, at 17-19. The template can be found in the existing SBP Appendix, or S&R Tariff Appendix M. The first paragraph of Section 16.2.4A.1 will be modified as follows in order to avoid confusion resulting from merging a Protocol into the Tariff:

**16.2.4A.1** The Responsible Participating TO with respect to an Existing Contract or set of interdependent Existing Contracts is required to submit to the ISO, in accordance with the timing requirements of Section 16.2.4A.2, the instructions that are necessary to implement the exercise of Existing Rights in accordance with the ISO Tariff. The operating instructions will be submitted to the ISO electronically, by the Responsible PTO, utilizing a form provided by the ISO in a format similar to the one set out in the Standard Template – Transmission Rights/Curtailment Instructions *in Appendix M*. The instructions will include the following information at a minimum and such other information as the ISO may reasonably require to enable it to carry out its functions under the ISO Tariff and ISO Protocols (the letters below correspond with the letters of the instructions template in the Standard Template – Transmission Rights/Curtailment Instructions *in Appendix M*):

Also, PG&E requests that the term “SP” be defined or deleted from Section 16.2.4A.1(i). Amended PG&E at 16. The CAISO agrees. The abbreviation for

“Scheduling Protocol” was inadvertently left in Section 16.2.4A.1(i), and the section should be adjusted accordingly:

**16.2.4A.1**

- (i) type(s) of service, by rights holder, by Existing Contract (firm, conditional firm, or non-firm), with priorities for firm and conditional firm transmission services indicated in Schedules using Adjustment Bids as described in **this ISO Tariff** the **SP**;

**29. Section 16.2.4A.2**

PG&E requests that the CAISO replace the phrase “specified by the ISO” with “as specified in Section 16.2.4A.1” in Section 16.2.4A.2. Amended PG&E at 18. The CAISO disagrees. With the exception of minor conforming language, Section 16.2.4A.2 is identical to existing SP 7.1.1. The additional change would be beyond the scope of the S&R Tariff.

Also, PG&E and TANC suggest that “this Section 2.4” should be changed to “this Section 16.2.4” in Section 16.2.4A.2. Amended PG&E at 18; TANC, *et al.*, at 19-20. The CAISO agrees. The reference to “SBP” was inadvertently changed to “Section 2.4” instead of “16.2.4” and Section 16.2.4A.2 should be adjusted accordingly:

**16.2.4A.2** The Responsible PTOs shall submit the operating instructions to the ISO associated with Existing Contracts or sets of interdependent Existing Contracts thirty (30) days prior to either (a) the ISO Operations Date or (b) the date on which the scheduling or curtailment of the use of the Existing Rights is to commence pursuant to Sections 16.1 or 16.2. The ISO will not accept Schedules which include the use of Existing Rights, unless the Responsible PTO has provided the ISO with the information required in the Transmission Control Agreement and this Section **16.2.4 2.4**, including transmission rights/curtailment instructions supplied in a form and by means of communication specified by the ISO.

**30. Section 16.2.4C**

PG&E requests that the CAISO delete the second sentence of Section 16.2.4C, as it is redundant with Section 16.2.3.1. Amended PG&E at 16. The CAISO agrees. In order to eliminate redundancy, one of the primary goals of the S&R Tariff, Section 16.2.4.C will be amended as follows:

**16.2.4C** To the extent that the operating instructions can not be exercised independently of the ISO and the results forwarded to the ISO (because, for example,



they require iteration with the ISO's scheduling process, would unduly interfere with the ISO's real-time management of curtailments or would unduly interfere with the ability of the holder of rights to exercise its rights), the operating instructions will be provided to the ISO for day-to-day implementation. ~~These instructions will be provided by the Responsible PTO to the ISO for implementation unless the parties to the Existing Contracts otherwise agree that the rights holder will do so.~~ For these instructions, the Scheduling Coordinators representing the holders of Existing Rights will submit their Schedules to the ISO for implementation in accordance with the instructions. In this case, the ISO shall act as the scheduling agent for the Participating TOs with regard to Existing Rights.

**31. Section 16.2.4F**

DWR and PG&E state that the last sentence of Section 16.2.4F is unclear and appears to be missing text explaining what provisions apply to real-time changes. DWR at 6; Amended PG&E at 16-17. The CAISO agrees that the integration is unclear. The sentence comes from DP 3.3. In the S&R Tariff the CAISO merged the first part of DP 3.3 into Section 4.5.3.2 and the second part into 16.2.4F. Upon further review, the CAISO would propose to delete the last sentence of 16.2.4F as unnecessary. The original sentence "The provisions of the SBP and the SP shall apply to real-time changes in Existing Contracts" is covered by the CAISO's integration of the substantive requirements of the SBP and the SP. For example, the new Section 16.2.6.4 incorporates the existing SP 7.4.4 concerning the reservation of inter-zonal capacity for Existing Rights.

**32. Section 16.2.4.1 through 16.2.7.2**

PG&E states that the numbering of Sections 16.2.4.1 through 16.2.7.2 is out of order and should be amended to reflect the original numbering convention in the SP. Amended PG&E at 16. The CAISO agrees. The sections were inadvertently misnumbered, and the Sections should be renumbered according to the following table:

Misnumbered Section Numbers in S&R Tariff	Corrected Section Numbers
16.2.4.1	16.2.4.1
16.2.4.2	16.2.4.1.1
16.2.4.3	16.2.4.1.2

16.2.5	16.2.4.2
16.2.5.1	16.2.4.2.1
16.2.5.2	16.2.4.2.2
16.2.5.3	16.2.4.2.3
16.2.5.4	16.2.4.2.4
16.2.6	16.2.4.3
16.2.6.1	16.2.4.3.1
16.2.6.2	16.2.4.3.2
16.2.6.3	16.2.4.3.3
16.2.6.4	16.2.4.3.4
16.2.6.5	16.2.4.3.5
16.2.7	16.2.4.4
16.2.7.1	16.2.4.4.1
16.2.7.2	16.2.4.4.2

As a result of the section number changes above, the cross references in the following S&R Tariff Sections will be updated as well: 16.2.4.2, 16.2.4.3, 16.2.5.4(b) and (e), 16.2.6.3, 16.2.6.4, 16.2.6.5(b) and (d), 16.2.7, 23, and 27.1.1.5.2.6.

**33. Section 16.2.4.2(a)**

PG&E comments that the sentence in Section 16.2.4.2(a) that begins with “To the extent that the MW amount...” should be rewritten to read, “To the extent that the MW amount in a schedule...” in order to improve clarity. Amended PG&E at 17. The CAISO disagrees. Section 16.2.4.2(a) is the existing SP 7.2.2, and the CAISO does not believe that the change is appropriate in light of the limited purpose of the S&R Tariff.

**34. Section 19**

PG&E states that Section 19, which contains former Demand Forecasting Protocol (“DFP”) provisions, imposes requirements that the CAISO, Scheduling Coordinators and Utility Distribution Coordinators have not consistently complied with in the past. PG&E at 10-11. While the CAISO appreciates the comment, any change in the Tariff to address his concern would be beyond simplification and reorganization of the existing ISO Tariff.

### **35. Section 23**

Metropolitan argues that the proposed definition of “new firm uses” in Section 23 is problematic because it only excludes “Existing Rights” in determining what transmission capacity is available for CAISO use, ignoring other transmission capacity that cannot be used for “new firm uses.” Metropolitan at 6-8. Metropolitan states that Section 23 would permit the CAISO to accept schedules over non-participating TOs’ transmission facilities from entities having no ownership or contract rights to such facilities. Metropolitan at 6-8. In addition, DWR notes that the definition is not in the Master Definition Supplement, and given its potential to affect many Market Participants, encourages the CAISO to develop a new definition through a stakeholder process. DWR at 6. It is important to note that the CAISO did not make changes to this provision, but merely transferred the existing SP 7.2.1. Any changes to address this concern should be undertaken in a separate proceeding following a stakeholder process, as suggested by Metropolitan, and not in the S&R Tariff docket.

### **36. Section 27.1.1.4.1.3**

PG&E requests that the CAISO add “and” before “to decrement” in Section 27.1.1.4.1.3. Amended PG&E at 18. Section 27.1.1.4.1.3 is identical to existing Tariff Section 7.2.4.1.4, but believes that correcting non-substantive typos is consistent with the purpose of the S&R Tariff and agrees to make the following correction:

**27.1.1.4.1.3** The ISO shall use Energy Bids from Generating Units and from other resources in the ISO's real-time system operation, for increasing resources' output for Intra-Zonal Congestion Management **and** to decrement Generation in order to accommodate Overgeneration conditions, including Reliability Must-Run Generation which the ISO requests under Reliability Must-Run Contracts.

### **37. Section 27.1.1.4.2.6**

Powerex states that Section 27.1.1.4.2.6 should be modified to reflect that the CAISO does not allow for the withdrawal of adjustment bids. Powerex at 10. The CAISO disagrees. The first part of Section 27.1.1.4.2.6 is derived from the Scheduling Protocol, and the second part is identical to the existing Tariff Section 7.2.4.2.6. While

the CAISO appreciates the comment, this change would be beyond the scope of the S&R Tariff.

**38. Section 27.1.1.6(d)**

PG&E states that Section 27.1.1.6(d) is internally ambiguous and that the comparison between hydro resources and MSS resources should be omitted. Amended PG&E at 13-14. The CAISO disagrees. On August 25, 2005, the CAISO filed the language at issue for approval at the Commission in compliance with the Commission's July 26, 2005 order, 112 FERC ¶ 61,136, directing the CAISO to modify Section 7.2.6 of the existing Tariff "to indicate that it treats hydroelectric resources in the same manner as it treats MSS [Metered Subsystem] resources." Given that the language is still pending FERC approval, the CAISO proposes not to make changes at this time.

**39. Section 27.1.1.6(d)(1)**

PG&E asserts that Section 27.1.1.6(d)(1) conflicts with Section 27.1.1.4.2.1 in that the former assumes that all sellers will bid, and the latter states that a Scheduling Coordinator is not required to submit an Adjustment Bid. Amended PG&E at 13. The CAISO disagrees that there is any conflict. First, the language from both of these Sections is unchanged. Section 27.1.1.4.2.1 applies to Adjustments Bids to resolve Inter-Zonal Congestion and does, indeed, provide that a Scheduling Coordinator is not required to submit them. Section 27.1.16(d)(1) applies to Intra-zonal Congestion only *if* a Scheduling Coordinator submits an Energy Bid, also a voluntary act.

**40. Section 27.1.1.6.1.1(a)(1)**

PG&E notes that the fourth sentence of Section 27.1.1.6.1.1(a)(1) contains a minor typographical error. Amended PG&E at 18. The CAISO agrees. A period and an extra space were inadvertently inserted, and a parenthesis inadvertently deleted. Section 27.1.1.6.1.1(a)(1) should be changed accordingly:

1. Excluding proxy bids, mitigated bids, and bids used out of merit order for managing Intra-Zonal Congestion, the accepted decremental bid, or the lower of the mean or the median of a resource's accepted decremental bids if such a resource has more than one accepted decremental bid in competitive periods over the previous 90 days for peak and off-peak periods, adjusted for daily changes in fuel prices using gas

price determined by Equation C1-8 (Gas) of the Schedules to the Reliability Must-Run Contract for the relevant Service Area (San Diego Gas & Electric Company, Southern California Edison Company, or Pacific Gas and Electric Company), or, if the resource is not served from one of those three Service Areas, from the nearest of those three Service Areas. There will be a six-day time lag between when the gas price used in the daily gas index is determined and when the daily gas index based on that gas price can be calculated. For the purposes of this Section 27.1.1.6.1, to determine whether accepted decremental bids over the previous 90 days were accepted during competitive periods, the independent entity responsible for determining reference prices will apply a test to the prior 90-day period. The test will require that the ratio of a unit's accepted out-of-sequence decremental bids (MWh) for the prior 90 days to its total accepted decremental bids (MWh) for the prior 90 days be less than 50 percent. If this ratio is greater or equal to 50%, accepted decremental bids will be determined to have been accepted in non-competitive periods and cannot be used to determine the decremental reference price. This test would be applied each day on a rolling 90-day basis. One ratio would be calculated for each unit with no differentiation for various output segments on the unit. Accepted and justified decremental bids below the applicable soft cap, as set forth in Section 39.3 of this Tariff, will be included in the calculation of reference prices;

#### **41. Section 27.1.2.1.5.2**

PG&E requests that the CAISO delete "for" before "any Scheduling Coordinator" in Section 27.1.2.1.5.2. Amended PG&E at 18. Section 27.1.2.1.5.2 is identical to existing Tariff Section 7.3.1.5.2. The CAISO agrees that correction of obvious typos is consistent with the simplification process and does not oppose PG&E's suggestion. Accordingly, the CAISO agrees to the following change:

**27.1.2.1.5.2** If a Scheduling Coordinator fails to provide the scheduled flows in a counter direction, it must reimburse the ISO for the ISO's costs of buying or selling Imbalance Energy in each of the Zones affected by the non-provided scheduled flows in a counter direction, at the ISO's Zonal Imbalance Energy prices. That is, ~~for~~ any Scheduling Coordinator that does not produce, in real time, the amount of Energy scheduled in the Day-Ahead Market or Hour-Ahead Market will be deemed to have purchased/sold the amount of Energy under/over produced in the real-time imbalance market at the real-time price.

#### **42. Section 27.2.1.2**

Powerex requests that the CAISO add a reference to Transmission Meter Multipliers ("TMMs") to Section 27.2.1.2 and throughout the remainder of the Tariff where the term "GMMs" is included because, according to Powerex, the appropriate terminology for External Imports at Scheduling Points is TMMs and not GMMs. Powerex at 9. Powerex also requests that TMMs be added to the Master Definitions Supplement and defined as "the transmission loss calculation associated with the

particular intertie.” The CAISO disagrees. The S&R Tariff is consistent with the existing Tariff. While the CAISO appreciates the comment, the S&R Tariff is not intended to introduce new concepts.

**43. Section 30.2**

PG&E seeks clarification on the location of the “ISO Data Templates and Validation Rules Document” referenced in Section 30.2. Amended PG&E at 14. This reference in S&R Tariff Section 30.2 is identical to the reference in existing Tariff SBP 2.1. Given that the level of detail PG&E suggests does not currently exist in the SBP, adding such detail would be beyond the scope of the S&R Tariff. For general informational purposes, the SI Data Templates and Validation Rules Document is posted on the CAISO Website under Market Operations Technical Information. The document is titled “SI Data Templates and Validation Rules” and the link is as follows: <http://www.caiso.com/docs/2005/10/01/2005100118333920546.html>.

**44. Section 30.2.6.14**

Powerex requests that the CAISO replace “WECC tags” with “NERC tags” in Section 30.2.6.14. Powerex at 10. While Section 30.2.6.14 is deliberately identical to SBP 2.1.3(n) in compliance with the S&R Tariff’s goals of simplification and reorganization, the CAISO does not oppose Powerex’s suggestion to correct an obvious error. The resulting text would be as follows:

**30.2.6.14** Complete **NERC WECC** tag;

**45. Section 30.3.1A**

DWR asserts that the deletion of the last four sentences in the blacklined version of Section 30.3.1A is unexplained, as DWR cannot find the two sections with which those four sentences were redundant. DWR at 7. According to the bracketed notes in Section 30.3.1A, the sentences were deleted as redundant with existing Tariff Sections 2.2.12.6 and 2.2.8.4, which have been transferred to S&R Tariff Sections 31.1.7 and 30.3.4.1. These two section transfers can be tracked in the “Mapping Table in Order of

Current CAISO Tariff” on page 4 and page 2, respectively. For convenience, the language of Sections 31.1.7 and 30.3.4.1 is as follows:

**31.1.7 ISO Analysis of Preferred Schedules.**

On receipt of the Preferred Schedules, the ISO will analyze the Preferred Schedules of Applicable RMR Scheduling Coordinators to determine the compatibility of such Preferred Schedules with the RMR Dispatch Notices. The ISO shall notify the Scheduling Coordinator of any specific Reliability Must-Run Units which have not been included in the Preferred Schedule but which the ISO requires to run in the next Trading Day. The ISO will also notify the Scheduling Coordinator of any Ancillary Services it requires from specific Reliability Must-Run Units under their Reliability Must-Run Contracts in the next Trading Day. If the ISO identifies mismatches in the scheduled quantity or location for any Inter-Scheduling Coordinator Energy Trade, it will notify the Scheduling Coordinators concerned and give them until a specified time, which will allow them approximately one half-hour, in which to modify their Schedules to resolve the mismatch before it applies the provisions of Section 30.2.3.4. The ISO shall analyze the combined Preferred Schedules submitted by all Scheduling Coordinators to forecast the probability of Congestion being caused by the Preferred Schedules. If the ISO finds that the Preferred Schedules will not cause Congestion, and subject to Section 30.2.3.4, the Preferred Schedules shall become the Final Schedules and the ISO shall notify Scheduling Coordinators accordingly.

**30.3.4.1 Final Schedules.**

If the ISO notifies a Scheduling Coordinator that there will be no Congestion on the ISO Controlled Grid based on the Preferred Schedules submitted by all Scheduling Coordinators, then subject to Section 30.2.3.4, the Preferred Schedule shall become that Scheduling Coordinator's Final Schedule. If the ISO has issued Suggested Adjusted Schedules and if no Scheduling Coordinator submits any changes to the Suggested Adjusted Schedules, all of the Suggested Adjusted Schedules shall become the Final Schedules. If the ISO has adjusted the Scheduling Coordinator's Preferred Schedule to match Inter-Scheduling Coordinator Energy Trades then the adjusted Preferred Schedule shall become that Scheduling Coordinator's Final Schedule.

If the ISO notifies a Scheduling Coordinator that there will be no Congestion on the ISO Controlled Grid become that Scheduling Coordinator's Final Schedule. If the ISO has adjusted the Scheduling Coordinator's Revised Schedule to match Inter-Scheduling Coordinator Energy Trades then the adjusted Revised Schedule shall become that Scheduling Coordinator's Final Schedule. If there is Congestion based on the Revised Schedules or mismatches in Inter-Scheduling Coordinator Energy Trades, the ISO shall adjust the Revised Schedules and issue Final Schedules. The Scheduling Coordinators will be notified, via WEnet, that their Schedules have become final. The ISO will also publish a final set of Usage Charges for Energy transfers between Zones, applicable to all Scheduling Coordinators. The Final Schedules shall serve as the basis for Settlement between the ISO and each Scheduling Coordinator.

**46. Section 30.4.1.2**

Powerex requests that the CAISO modify Section 30.4.1.2 to reflect that in practice the CAISO does not adjust imports or exports for Transmission Losses. Powerex at 7. While the CAISO appreciates the comment, the language in Section

30.4.1.2 was taken from the existing SBP 2.2.2. The suggested change is beyond the scope of the S&R Tariff.

**47. Section 33.1.2.3.1.2**

Powerex suggests that the CAISO change “Location Code of each Generating Unit, System Resource and Scheduling Point” in Section 33.1.2.3.1.2 to instead read “Resource Point of each Generating Unit, System Resource and Scheduling Point.” Powerex at 7-9. Powerex also suggests that the CAISO add references to System Resources where appropriate, e.g. the definition of “Ancillary Service Provider.” Powerex at 7-9. While the CAISO appreciates the comment, the language in Section 33.1.2.3.1.2 was taken from existing ISO Tariff Section 2.2.13.3.1.2. Any additional change is beyond the scope of the S&R Tariff.

**48. Section 36.2.3**

Powerex suggests that the CAISO replace specific, past date references in Section 36.2.3 with general language. Powerex at 10. The CAISO agrees that obvious non-substantive corrections to outdated language can be made consistent with the purpose of the S&R Tariff. Accordingly, the CAISO does not oppose Powerex’s suggestion. Section 36.2.3 should be modified to read as follows:

**36.2.3** Each FTR shall be issued in the denomination of 1 MW. The **annual initial** release of FTRs shall start with the hour beginning at 12:00 a.m., on **AprilFebruary 1, 2000** and end with the hour beginning at 11:00 p.m., on March 31, **2004 of the following year**. An FTR shall not afford the FTR Holder any right to share in Usage Charges attributable to Inter-Zonal Congestion occurring in any hour before or after the term of the FTR.

**49. Appendix A**

DWR states that the proposed new definition of “trading interval” is redundant with the definition of “Settlement Period.” DWR at 7. The term “trading interval” comes from SABP 1.2.2. While the CAISO does not necessarily disagree with DWR about the redundancy between the two terms, the CAISO does not believe the change is appropriate in light of the limited purpose of the S&R Tariff.

SMUD notes that the definition of “FTR Market” contains an inaccurate cross reference to Section 9.4. SMUD at 7. The CAISO agrees. The cross reference should



have been modified to refer to Section 36.4 rather than Section 9.4. Accordingly, the definition of “FTR Market” should read as follows:

**FTR Market**

A transmission path from an originating Zone to a contiguous receiving Zone for which FTRs are auctioned by the ISO in accordance with Section ~~36.4~~ **9.4** of the ISO Tariff.

SMUD also notes that the definition of “Interest” contains an inaccurate cross reference to SABP 6.10.5. SMUD at 7. The CAISO agrees. The cross reference should have been modified to refer to Section 11.2.1 rather than SABP 6.10.5.

Accordingly, the definition of “Interest” should read as follows:

**Interest**

Interest shall be calculated in accordance with the methodology specified for interest on refunds in the regulations of FERC at 18 C.F.R. §35.19(a)(2)(iii) (1996). Interest on delinquent amounts shall be calculated from the due date of the bill to the date of payment, except as provided in **Section 11.2.1 SABP-6.10.5**. When payments are made by mail, bills shall be considered as having been paid on the date of receipt.

SMUD states finally that the definition of “Wheeling Access Charge” contains an inaccurate cross reference to Section 7.1. SMUD at 7. The CAISO agrees. The cross reference should have been modified to refer to Section 26.1 rather than Section 7.1.

Accordingly, the definition of “Wheeling Access Charge” should read as follows:

**Wheeling Access Charge**

The charge assessed by the ISO that is paid by a Scheduling Coordinator for Wheeling in accordance with Section ~~26.17.1~~. Wheeling Access Charges shall not apply for Wheeling under a bundled non-economy Energy coordination agreement of a Participating TO executed prior to July 9, 1996. The Wheeling Access Charge may consist of a High Voltage Wheeling Access Charge and a Low Voltage Wheeling Access Charge.

## **50. Appendix B.2**

SMUD notes that Appendix B.2, Section 4.1.1 contains an inaccurate cross reference to Tariff Section 5.3. SMUD at 7. The CAISO agrees. The cross reference

should have been modified to refer to Section 4.6.4 rather than Section 5.3.

Accordingly, Section 4.1.1 should read as follows:

- 4.1.1 Identification of Generating Units.** The Participating Generator has identified the Generating Units that it owns, operates or has a contractual entitlement to in Schedule 1, as required by Section ~~4.6.4~~ **5.3** of the ISO Tariff.

SMUD also points out that Appendix B.2, Section 4.4.1 contains an inaccurate cross reference to Tariff Section 5.8.3. SMUD at 7. The CAISO agrees. The cross reference should have been modified to refer to Section 4.6.7.3 rather than Section 5.8.3. Accordingly, Section 4.4.1 should read as follows:

- 4.4.1 Major Incident Reports.** The Participating Generator shall promptly provide such information as the ISO may reasonably request in relation to major incidents, in accordance with Section ~~4.6.7.3~~ **5.8.3** of the ISO Tariff.

SMUD states further that Appendix B.2, Sections 9.1 and 10.1 have become redundant with the S&R Tariff combination of Sections 14 and 15 into S&R Tariff Section 14. SMUD at 7. The CAISO disagrees. The language of existing Tariff Sections 14 and 15, now in S&R Tariff Section 14, has not changed. The CAISO does not believe that the merger of these two sections has created redundancy, nor has it eliminated the need for inclusion of Sections 9.1 and 10.1 in the Participating Generator Agreement in Appendix B.2.

## **51. Appendix B.4**

SMUD notes that Appendix B.4, Section 4.2.2 contains an inaccurate cross reference to Tariff Section 2.2.11.1. SMUD at 7. The CAISO agrees. The cross reference should have been modified to refer to Section 30.2.1 rather than Section 2.2.11.1. Accordingly, Section 4.2.2 should read as follows:

- 4.2.2 Dispatchable Load.** The Participating Load shall schedule Dispatchable Load pursuant to Section ~~30.2.1~~ ~~2.2.11.1~~ of the ISO Tariff. Dispatchable Load shall comply with the ISO's communication and metering requirements.

## 52. Appendix F, Schedule 2

SMUD notes that the description of "Replacement Reserve Charge" in Appendix F, Schedule 2 contains an inaccurate cross reference to Tariff Section 2.5.28.4. SMUD at 7. The CAISO agrees. The cross reference should have been modified to refer to Section 8.12.3A rather than Section 2.5.28.4. Accordingly, Appendix F, Schedule 2 should read as follows:

### **Replacement Reserve Charge**

The Replacement Reserve Charge will be calculated in accordance with ISO Tariff Sections ~~8.12.3A 2.5.28.4~~ and 11.2.4.1.

## 53. Appendix F, Schedule 3

SMUD notes that Appendix F, Schedule 3, Sections 5.7 and 7 contain inaccurate cross references to Tariff Section 8.6. SMUD at 8. The CAISO agrees. The cross references should have been modified to refer to Section 26.5 rather than Section 8.6. Accordingly, Section 5.7 and Section 7 should read as follows:

**5.7** The Transition Charge shall be calculated separately for each Participating TO by dividing (i) the net difference between (1) the Participating TO's payment responsibility, if any, under Section ~~26.5 8.6~~ of the ISO Tariff and Section 7 of this Schedule 3; and (2) the amount, if any, payable to the Participating TO in accordance with Section 26.5 of the ISO Tariff and Section 7 of this Schedule 3; by (ii) the total of all forecasted Gross Load in the PTO Service Territory of the Participating TO, including the UDC and/or MSS Operator. If greater than zero, the Transition Charge shall be collected with the High Voltage Access Charge. If less than zero, the Transition Charge shall be credited with the High Voltage Access Charge. The amount of each Participating TO's NHVTRR shall not be included in the Transition Charge calculation.

## 7. Limitation

- (a) During each year of the transition period described in this Schedule 3, the increase in the total payment responsibility applicable to Gross Loads in the PTO Service Territory of an Original Participating TO attributable to the total for the year of (i) the amount applicable for the Original Participating TO under Section ~~26.5 8.6~~ of the ISO Tariff; plus (ii) the amount applicable to the implementation of the High Voltage Access Charge shall not exceed the amount specified in paragraph (b) of this section. This limitation shall be calculated individually for each Original Participating TO, provided that, if the net effect of clauses (i) and (ii) of this paragraph is positive for one or more Original Participating TOs for any year, the combined net effect shall be allocated among all Original Participating TOs in proportion to the amounts specified in paragraph (b) of this section. This limitation shall be applied by the ISO's calculation annually of amounts payable by New Participating TOs to Original Participating TOs such that the combined effect of clauses (i) and (ii) of this paragraph, and the payments received by each

Original Participating TO shall not exceed the amounts specified in paragraph (b) of this section. The amount receivable by the Original Participating TO from the New Participating TOs to implement the limitation in paragraph (b) of this section, shall be credited through the Transition Charge established pursuant to Section 5.7 of this Schedule 3. Payment responsibility under this section, if any, shall be allocated among New Participating TOs in proportion to their TAC Benefits.

- (b) The maximum annual amounts for Original Participating TO shall be as follows:
  - (i) For Pacific Gas and Electric Company and Southern California Edison Company, the maximum annual amount shall be thirty-two million dollars (\$32,000,000.00) each; and
  - (ii) For San Diego Gas & Electric Company, the maximum annual amount shall be eight million dollars (\$8,000,000.00).

SMUD notes the Methodology for Developing the Weighted Average Rate for Wheeling Service in Appendix H contains an inaccurate cross references to Tariff Section 7.1.4. SMUD at 8. The CAISO agrees. The cross reference should have been modified to refer to Section 26.1.4 rather than Section 7.1.4. Accordingly, Appendix H should read as follows:

**Appendix H: Methodology for Developing the Weighted Average Rate for Wheeling Service**

$P_n$  = The applicable Wheeling Access Charge rate for a TAC Area or Participating TO<sub>n</sub> in \$/kWh as set forth in Section ~~26.1.4~~ ~~7.1.4~~ of the ISO Tariff and Section 5 of the TO Tariff.

**E. Table of Conforming Changes from Pro Forma Agreements.**

PG&E notes in footnote 2 of its Amended Motion to Intervene and Protest that a table updating CAISO Pro Forma Agreement and Contract cross references would help to reduce confusion and burden. Amended PG&E at 7. SMUD also requests such a table. SMUD at 12. Attachment A to this filing is a chart that reviews each of the CAISO contracts. The chart identifies the contract, the current Tariff cross references contained in that contract and how those cross-references would be transferred to the S&R Tariff. The CAISO proposes to include this chart as part of the S&R Tariff as Annex 1 to Appendix B: Pro Forma Agreements.

**F. Tariff Sheet Designations Indicating a Future Effective Date.**

Powerex opposes the use of a November 21, 2005 effective date for each sheet in the S&R Tariff because certain of the sheets in the ISO Tariff in effect as of the date of the S&R Tariff filing contain designations indicating that they will be made “effective upon notice,” or some similar phrasing indicating a future effective date. Powerex at 5-6. As Powerex acknowledges (at 5), the CAISO has already identified this issue. Attachment B this present filing contains a table with an entry for each sheet in the ISO Tariff in effect as of the date of the S&R Tariff filing that contains a designation indicating a future effective date. Attachment B provides the current status of each sheet, including the dates on which tariff sheets became effective for tariff provisions that have been implemented. As shown in that table, all of the existing Tariff sheets with the exception of Nos. 20, 214, and 247A through 247D.01, and the sheets containing certain provisions of the Enforcement Protocol as described in the CAISO’s August 1, 2005 compliance filing in Docket No. ER03-1102, have been placed into effect. Consequently, all of the existing S&R Tariff sheets with the exception of Nos. 208 through 212, 218, 342 through 343, 360, 947 through 949, and the sheets containing the certain provisions of the Enforcement Protocol as described in the CAISO’s August 1, 2005 compliance filing in Docket No. ER03-1102, appropriately have a November 21, 2005 effective date.

**G. There Is No Need for Additional Settlement Procedures.**

Two intervenors, TANC and NCPA, request that the Commission establish settlement procedures to provide an additional period of review and correction of the S&R Tariff. TANC, *et al.*, at 13; NCPA at 6. Such procedures are unwarranted. The S&R Tariff, as modified based on the CAISO’s responses to the specific comments as discussed herein, should be accepted and allowed to go into effect. As discussed above, many of the suggested changes go beyond the purpose of the S&R Tariff and, thus should not be considered in this docket at all. Moreover, the CAISO has pledged to continue to improve the S&R Tariff once it goes into effect. Finally, the Commission can accept the S&R Tariff as the simplified and reorganized version of the existing ISO Tariff—any errors, if any, such as erroneous cross-references—would have no

substantive effect. The CAISO would, of course, be willing to correct such errors periodically.

### **III. CONCLUSION.**

Wherefore, with the changes as suggested above, the CAISO respectfully requests that the Commission accept the S&R Tariff effective after a limited 30-60 day suspension and grant waiver of the Order No. 614 requirements for the MRTU Tariff filing so that the S&R Tariff can serve as the baseline for that filing to implement the CAISO's new market design.

Respectfully submitted,

/s/

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## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in the above-captioned docket.

Dated at Folsom, California on this 4<sup>th</sup> day of November, 2005.

/s/

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Sidney Mannheim Davies  
Counsel for the California Independent  
System Operator



ATTACHMENT A

**MAPPING TABLE TRACKING CROSS REFERENCES IN CAISO CONTRACTS AND AGREEMENTS FROM JUNE 2005 CONFORMED TARIFF TO SEPTEMBER 2005 SIMPLIFIED AND REORGANIZED TARIFF<sup>1</sup>**

Location of Cross Reference (page or section number)	Cross Reference as of June 2005 Conformed Tariff	Cross Reference as of Simplified & Reorganized Tariff
<b>Pro Forma Reliability Must Run Contract</b>		
In definition of "RMR Payments Calendar" on page 12; Article 9.1(a) on page 69; Article 9.2 on page 75 & 76; Article 9.3(a) on page 76 & 77	Annex 1 of the Settlement and Billing Protocol of the ISO Tariff	Part J to Appendix N of the S&R Tariff
In definition of "Long-term Planned Outage" on page 8	ISO's Outage Coordination Protocol	Majority of OCP transferred to Section 9 of the S&R Tariff
In definition of "Scheduling Coordinator" on page 12	Section 2.2.6 of the ISO Tariff	Section 4.5.3 of the S&R Tariff
Article 2.2(d) on page 16	Refers to "Replacement Reserve" as defined in the Master Definition Supplement	Same
Article 4.1(c)(v)(C) on page 24	Section 2.5.3.6 of the ISO Tariff	Section 8.2.3.6 of the S&R Tariff
Article 4.2 on page 25	Refers to "Final Schedule" as defined in Master Definition Supplement	Same
Article 4.9(c) on page 32	Ancillary Services Requirements Protocol ("ASRP") in the ISO Tariff	Majority of ASRP transferred to Section 8 of the S&R Tariff
Article 7.5(a)(ii) on page 49 and Article 7.5(k)(i) on page 53	Section 5.2.8 of the ISO Tariff	Section 30.6.1.2 of the S&R Tariff

<sup>1</sup> The following contracts/agreements do not appear in this table, as they did not contain cross references in need of updating: (1) TCA Appendix A, with the exception of the Supplement to Edison Appendix A: Notices Pursuant to Section 4.1.5 and the Supplement to SDG&E's Appendix A: Notices Pursuant to Section 4.1.5; (2) TCA Appendix B, with the exception of the Encumbrances (Exhibit B-1 to PG&E Appendix B); and (3) TCA Appendix C, E and F.

<b>Location of Cross Reference (page or section number)</b>	<b>Cross Reference as of June 2005 Conformed Tariff</b>	<b>Cross Reference as of Simplified &amp; Reorganized Tariff</b>
Article 9.1(a) on page 69; Article 9.2 on page 75 & 76; Article 9.4(b)(iii)-(iv) and (c) on page 78; Article 9.7 on page 83	Section 5.2.7 of the ISO Tariff	Section 30.6.1.1 of the S&R Tariff
Article 9.4(e) on page 79	Section 13 of the ISO Tariff	No update
Article 12.6 on page 96	Section 14.3 of the ISO Tariff	Section 14.2 of the S&R Tariff
<b>Pro Forma Reliability Must Run Schedule</b>		
Schedule E, page 39	List of Ancillary Services	Same
Schedule E, page 44	ISO Ancillary Services Requirements Protocol and ISO Dispatch Protocol	Majority of the ASRP deleted as redundant with or added to Section 8 of the ISO Tariff; majority of DP added to Section 7 and 34 of the S&R Tariff
Schedule K, page 69	Refers to "RMR Charge" and "RMR Refund" as defined in Annex 1 of the SABP	Reference to SABP Annex 1 should be changed to Appendix N of the S&R Tariff.
<b>Transmission Control Agreement</b>		
Section 2.2.1(iv) on Sheet No. 4; Section 4.1.1 on Sheet No. 15; Section 4.4.3 on Sheet No. 23; Section 13 on Sheet No. 45	Sections 2.4.3 and 2.4.4 of the ISO Tariff	Sections 16.1 and 16.2 of the S&R Tariff
Section 4.1.2 on Sheet No. 16	Section 3.2.9 of the ISO Tariff	Section 24.9 of the S&R Tariff
Section 4.5.4 on Sheet No. 25; Section 11 on Sheet No. 44A	Section 3.2 of the ISO Tariff	Section 24 of the S&R Tariff
Section 4.6.1 on Sheet No. 25	Section 2.3.1.1 of the ISO Tariff	Section 7.1.1 of the S&R Tariff
Section 4.7.2 on Sheet No. 27; Section 15 on Sheet No. 48; Section 26.11 on Sheet No. 62	Section 13 of the ISO Tariff	Same
Section 5.1.1. on Sheet No. 27	Section 13.2.2 of the ISO Tariff	Same

<b>Location of Cross Reference (page or section number)</b>	<b>Cross Reference as of June 2005 Conformed Tariff</b>	<b>Cross Reference as of Simplified &amp; Reorganized Tariff</b>
Section 5.4.1 on Sheet No. 31; Section 26.3.1 on Sheet No.59A	Section 6 of the ISO Tariff	Section 6.4 of the S&R Tariff
Section 7.1 on Sheet No. 36; Section 7.3.2 on Sheet No. 37	Section 2.3.3 of the ISO Tariff	Section 9.3 of the S&R Tariff
Section 9.1 on Sheet No. 39	Section 2.3.2 of the ISO Tariff	Section 7.4 of the S&R Tariff
Section 9.3.2 on Sheet No. 40	Section 2.3 of the ISO Tariff	Section 7 of the S&R Tariff
Section 12.1 on Sheet No. 45	Section 2.1.2 of the ISO Tariff	Section 2.2 of the S&R Tariff
Section 16.1 on Sheet No. 48	Section 11 of the ISO Tariff	Same
Section 17.2.3(ii) on Sheet No. 50	Section 2.3.3.5 of the ISO Tariff	Section 9.3.6 of the S&R Tariff
Section 22.1 on Sheet No. 55	Section 13.3.14 of the ISO Tariff	Same
Section 26.3.1 on Sheet No. 59	Section 20.3 of the ISO Tariff	Section 20 of the S&R Tariff
<b>TCA: Supplement to Edison Appendix A: Notices Pursuant to Section 4.1.5</b>		
Footnote #2 on Sheet No. 87	Section 3.2.2 of the ISO Tariff	Section 24.2 of the S&R Tariff
<b>TCA: Supplement to SDG&amp;E's Appendix A: Notices Pursuant to Section 4.1.5</b>		
Footnote #3 on Sheet No. 91	Section 3.2.2 of the ISO Tariff	Section 24.2 of the S&R Tariff
<b>TCA: Appendix B: Encumbrances (Exhibit B-1 to PG&amp;E Appendix B)</b>		
Introduction paragraph on Sheet No. 110	Sections 2.4.3.1, 2.4.4.4.1, and 2.4.4.4.3 of the ISO Tariff	Sections 16.1.1, 16.2.3.1, and 16.2.3.3 of the S&R Tariff
<b>TCA: Appendix D: Master Definition Supplement</b>		
In definition of "Existing Rights" on Sheet No. 189	Section 2.4.4.1.1 of the ISO Tariff	Section 16.2.1.1 of the S&R Tariff
In definition of "ISO ADR Procedures" on Sheet No. 195	Section 13 of the ISO Tariff	Same
In definition of "ISO Control Center" on Sheet No. 195	Section 2.3.1.1 of the ISO Tariff	Section 7.1.1 of the S&R Tariff

<b>Location of Cross Reference (page or section number)</b>	<b>Cross Reference as of June 2005 Conformed Tariff</b>	<b>Cross Reference as of Simplified &amp; Reorganized Tariff</b>
In definition of "ISO Outage Coordination Office" on Sheet No. 196	Section 2.3.3 of the ISO Tariff	Section 9.3 of the S&R Tariff
In definition of "Non-Converted Rights" on Sheet No. 199	Section 2.4.4.2.1 of the ISO Tariff	Section 16.2.1A.1 of the S&R Tariff
In the definition of "Non-Participating TO" on Sheet No. 199	Section 2.4.3 and 2.4.4 of the ISO Tariff	Sections 16.1 and 16.2 of the S&R Tariff
In definition of "Project Sponsor" on Sheet No. 202	Section 3.2 of the ISO Tariff	Section 24 of the S&R Tariff
In the definition of "Scheduling Coordinator" on Sheet No. 204	Section 2.2.6 of the ISO Tariff	Section 4.5.3 of the S&R Tariff
<b>Dynamic Scheduling Host Control Area Operating Agreement</b>		
Section 2.2.2 on page 2; Section 2.2.6 on page 3; Section 3.3 on page 3; Section 4 on page 4; Section 5 on page 4; Section 7.2 on page 5; Section 8.4 on page 6	Dynamic Scheduling Protocol	Majority of DSP transferred to Appendix X of the S&R Tariff
<b>Qualifying Facility Participating Generator Agreement</b>		
Section D on page 1	Section 5.1.5 of the ISO Tariff	Section 4.6.3.2 of the S&R Tariff
Section 2.2 on page 4	Section 5 of the ISO Tariff	Section 4.6 of the S&R Tariff
Section 4.1.1 on page 5	Section 5.3 of the ISO Tariff	Sections 30.6.1.3 and Section 4.6.4 of the S&R Tariff
Section 4.1.2 on page 5; Section 4.1.3 on page 5	Section 2.5.25 of the ISO Tariff	Section 8.10.1 of the S&R Tariff
Section 4.2 on page 6	Section 2.3.2, 2.5.3.4 and 5 of the ISO Tariff	Sections 7.4, 8.2.3.4 and 4.6 of the S&R Tariff
Section 4.2.1 on page 6	Metering Protocol Section 2.2.4.3 and Section 2.3.5	Section 10.1.3 (and subsections) of the S&R Tariff
Section 4.2.2 on page 6	Metering Protocol	Majority of MP transferred to Section 10 of the S&R Tariff

<b>Location of Cross Reference (page or section number)</b>	<b>Cross Reference as of June 2005 Conformed Tariff</b>	<b>Cross Reference as of Simplified &amp; Reorganized Tariff</b>
Section 4.3.2 on page 7	Section 2.5.6 and Section 2.5.24 of the ISO Tariff	Sections 8.4 and 8.10 of the S&R Tariff
Section 4.4.1 on page 7	Section 5.8.3 of the ISO Tariff	Section 4.6.7.3 of the S&R Tariff
Section 4.5 on page 7	Section 5.11.4 of the ISO Tariff	Section 40.1.4 of the S&R Tariff
Section 4.5 on page 7	Section 2.3, 5.1.4 and 11.2.4.2.1 of the ISO Tariff	Sections 7, 4.6.3, 11.2.4.2.1 of the S&R Tariff
Section 7.1 on page 8	Section 13 of the ISO Tariff	Same
Section 9.1 on page 9	Section 14 of the ISO Tariff	Same
Section 10.1 on page 9	Section 15 of the ISO Tariff	Section 14.1 of the S&R Tariff
Section 11.1 on page 10	Section 17 of the ISO Tariff	Section 22.2 of the S&R Tariff
Section 11.2 on page 10	Section 20.1 of the ISO Tariff	Section 22.4 of the S&R Tariff
Section 11.5 on page 10	Section 20.8 of the ISO Tariff	Section 22.9 of the S&R Tariff
<b>Dynamic Scheduling Agreement for Scheduling Coordinators</b>		
Section 4.1.1 on page 4	Section 2.2.7.6 of the ISO Tariff	Section 4.5.4.3 of the S&R Tariff
Section 4.1.7 on page 5	Section 2.5.25 of the ISO Tariff	Section 8.10.1 of the S&R Tariff
Section 4.2 on page 5	Section 2.2.7.6 and 2.5.6.2 of the ISO Tariff	Sections 4.5.4.3 and 8.4.5 of the S&R Tariff
Section 5.1 on page 5	Section 11.2.4.1.2 of the ISO Tariff	Section 11.2.4.1.2; (e) transferred in part to Section 11.2.4.5 of the S&R Tariff; (h) second sentence deleted as redundant with UDPAP 3.1.1, 3.1.2(2)(c); last three sentences of (h) added to UDPAP 3.1.1, 4.2, and 3.1.2(6)
Section 7.1 on page 6	Section 13 of the ISO Tariff	Same
Section 9.1 on page 6	Section 14 of the ISO Tariff	Same
Section 10.1 on page 7	Section 15 of the ISO	Section 14.1 of the S&R

<b>Location of Cross Reference (page or section number)</b>	<b>Cross Reference as of June 2005 Conformed Tariff</b>	<b>Cross Reference as of Simplified &amp; Reorganized Tariff</b>
	Tariff	Tariff
Section 11.1 on page 7	Section 17 of the ISO Tariff	Section 22.2 of the S&R Tariff
Section 11.2 on page 7	Section 20.1 of the ISO Tariff	Section 22.4 of the S&R Tariff
Section 11.5 on page 7	Section 20.8 of the ISO Tariff	Section 22.9 of the S&R Tariff
<b>Participating Generator Agreement: Schedule 1</b>		
Footnote 1	Section 2.5.24 and 2.5.25 and 5.3 and 5.8.1 of the ISO Tariff and Section 9 of the ASRP	Section 2.5.24 is Section 8.10 of the S&R Tariff; Section 2.5.25 is Section 8.10.1 of the S&R Tariff; Section 5.3 is Section 30.6.1.3 and 4.6.4 of the S&R Tariff; Section 5.8.1 is Section 4.6.7.1 of the S&R Tariff; and ASRP 9 is deleted in part and merged in part with Section 8.10.1 of the S&R Tariff
<b>Participating Load Agreement</b>		
Section 4.1.1 on page 4	Section 2.5.6.1 and 2.5.25 of the ISO Tariff	Sections 8.4.1 and 8.10.1 of the S&R Tariff
Section 4.2.1 on page 4	Section 2.5.6.2 and 2.5.6.3 of the ISO Tariff	Sections 8.4.5 and 8.4.6 of the S&R Tariff
Section 4.2.2 on page 4	Section 2.2.11.1 of the ISO Tariff	Section 30.2.1 of the S&R Tariff
Section 4.4 on page 5	Section 2.5.25 of the ISO Tariff	Section 8.10.1 of the S&R Tariff
Section 4.5 on page 5	Section 2.3.2, 2.5 and 10 of the ISO Tariff	Sections 7.4, 8 and 10 of the S&R Tariff
Section 4.6.2 on page 5	Section 2.5.6 and 2.5.24 of the ISO Tariff	Sections 8.4 and 8.10 of the S&R Tariff
Section 5.1 on page 6	Section 2.5.26 of the ISO Tariff	Section 8.10.2 of the S&R Tariff
Section 7.1 on page 6	Section 13 of the ISO Tariff	Same
Section 9.1 on page 7	Section 14 of the ISO Tariff	Same
Section 10.1 on page 7	Section 15 of the ISO Tariff	Section 14.1 of the S&R Tariff

<b>Location of Cross Reference (page or section number)</b>	<b>Cross Reference as of June 2005 Conformed Tariff</b>	<b>Cross Reference as of Simplified &amp; Reorganized Tariff</b>
Section 11.1 on page 8	Section 17 of the ISO Tariff	Section 22.2 of the S&R Tariff
Section 11.2 on page 8	Section 20.1 of the ISO Tariff	Section 22.4 of the S&R Tariff
Section 11.5 on page 8	Section 20.8 of the ISO Tariff	Section 22.9 of the S&R Tariff
Schedule 1, footnote 1	Sections 2.5.24 and 2.5.25 of the ISO Tariff and Section 9 of the ASRP	Sections 8.10 and 8.10.1 of the S&R Tariff. Section 9 of the ASRP has been deleted in part and merged in part with Section 8.10.1 of the S&R Tariff
<b>Meter Service Agreement for ISO Metered Entities</b>		
Section A on page 1	Section 10.3.1 of the ISO Tariff	Section 10.2.7.1 of the S&R Tariff
Section B on page 1	Section 10.2.4 of the ISO Tariff	Same
Section D on page 1; Section 1.3(l) on page 3; Section 3.2.1 on page 5; Section 3.2.3 on page 5; Section 3.2.4 on page 5; Section 3.2.5 on page 5; Section 3.3.1 on page 6	Metering Protocol	Majority added to or merged with Section 10 of the S&R Tariff
Definition of "ISO Authorized Inspector"	"as defined in the Metering Protocol"	Term now defined in the S&R Tariff Appendix A: Master Definition Supplement, renamed "CAISO Authorized Inspector"
Definition of "Metering Protocol"	The reference to "Metering Protocol," Section 10 of the ISO Tariff, and Appendix J of the ISO Tariff	The majority of the Metering Protocol was added to Section 10 of the S&R Tariff; Section 10 remains Section 10 of the S&R Tariff; Appendix J remains Appendix J of the S&R Tariff
Section 2.2.1 on page 4; Section 10.1 on page 8	Section 15 of the ISO Tariff	Section 14.1 of the S&R Tariff
Section 3.1 on page 4	Reference to "Metering Protocol" and Section 10	The majority of the Metering Protocol was added to

<b>Location of Cross Reference (page or section number)</b>	<b>Cross Reference as of June 2005 Conformed Tariff</b>	<b>Cross Reference as of Simplified &amp; Reorganized Tariff</b>
	of the ISO Tariff	Section 10 of the S&R Tariff; Section 10 remains Section 10 of the S&R Tariff
Section 9.1 on page 8	Section 14 of the ISO Tariff	Same
Section 11.1 on page 8	Section 17 of the ISO Tariff	Section 22.2 of the S&R Tariff
Section 11.2 on page 9	Section 20.1 of the ISO Tariff	Section 22.4 of the S&R Tariff
Section 11.5 on page 9	Section 20.8 of the ISO Tariff	Section 22.9 of the S&R Tariff
<b>Participating Generator Agreement</b>		
Section 4.1.1 on page 4	Section 5.3 of the ISO Tariff	Sections 30.6.1.3 and 4.6.4 of the S&R Tariff
Section 4.1.2 on page 4; Section 4.1.3 on page 5	Section 2.5.25 of the ISO Tariff	Section 8.10.1 of the S&R Tariff
Section 4.2 on page 5	Section 2.3.2, 2.5.3.4 and 5 of the ISO Tariff	Sections 7.4, 8.2.3.4 and 4.6 of the S&R Tariff
Section 4.3.2 on page 5; Section 4.3.3 on page 5	Section 2.5.6 and 2.5.24 of the ISO Tariff	Sections 8.4 and 8.10 of the S&R Tariff
Section 4.4.1 on page 6	Section 5.8.3 of the ISO Tariff	Section 4.6.7.3 of the S&R Tariff
Section 7.1 on page 6	Section 13 of the ISO Tariff	Same
Section 9.1 on page 7	Section 14 of the ISO Tariff	Same
Section 10.1 on page 7	Section 15 of the ISO Tariff	Section 14.1 of the S&R Tariff
Section 11.1 on page 7	Section 17 of the ISO Tariff	Section 22.2 of the S&R Tariff
Section 11.5 on page 8	Section 20.8 of the ISO Tariff	Section 22.9 of the S&R Tariff
<b>Meter Service Agreement for Scheduling Coordinators</b>		
Section A and Section B on page 1	Section 10.6.7 of the ISO Tariff	Section 10.3.13 of the S&R Tariff
Section D on page 1; definition of "ISO Authorized Inspector" on page 2; Section 1.3(1) on page 3; Section 3.3.4 on page 5	References "Metering Protocol"	The majority of the Metering Protocol was added to Section 10 of the S&R Tariff



<b>Location of Cross Reference (page or section number)</b>	<b>Cross Reference as of June 2005 Conformed Tariff</b>	<b>Cross Reference as of Simplified &amp; Reorganized Tariff</b>
Definition of "Metering Protocol" on page 2; Section 3.1 on page 4	References "Metering Protocol" and Section 10 of the ISO Tariff	The majority of the Metering Protocol was added to Section 10 of the S&R Tariff and Section 10 remains the same
Section 2.2.1 on page 4	Section 15 of the ISO Tariff	Section 14.1 of the S&R Tariff
Section 7.1 on page 7	Section 13 of the ISO Tariff	Same
Section 9.1 on page 8	Section 14 of the ISO Tariff	Same
Section 10.1 on page 8	Section 15 of the ISO Tariff	Section 14.1 of the S&R Tariff
Section 11.1 on page 8	Section 17 of the ISO Tariff	Section 22.2 of the ISO Tariff
Section 11.2 on page 9	Section 20.1 of the ISO Tariff	Section 22.4 of the S&R Tariff
Section 11.5 on page 9	Section 20.8 of the ISO Tariff	Section 22.9 of the S&R Tariff
<b>Utility Distribution Company Operating Agreement</b>		
Section 3.1.1 on page 4	Section 4.9 of the ISO Tariff	Section 4.4.9 of the S&R Tariff
Section 3.2 on page 4	Section 16.1, 20.1.3, and Section 4 of the ISO Tariff	Sections 22.10.1, 22.4.3, and 4.4 of the S&R Tariff
Section 3.4.1 on page 5	Section 16.1 and 20.1.3 of the ISO Tariff	Sections 22.10.1 and 22.4.3 of the S&R Tariff
Section 3.5 on page 5	Section 2.2.3 and 2.2.4 of the ISO Tariff	Section 2.2.3 is Section 4.5.1 of the S&R Tariff; Section 2.2.4 was deleted as redundant with SCAP 2 through SCAP 6
Section 3.7 on page 5	Section 4.1.2 of the ISO Tariff	Section 4.4.1.2 of the S&R Tariff
Section 4.1.1 on page 6	Reference to "Outage Coordination Protocol"	Majority of OCP is added to or deleted as redundant with Section 9 of the S&R Tariff
Section 4.2 on page 6	Section 4.4 of the ISO Tariff; the Dispatch Protocol	Section 7.4 of the S&R Tariff; the majority of the DP added to Section 7 and 34 of the S&R Tariff
Section 4.2.1 on page 6	Section 2.3.2 and 4.4.3 of	Sections 7.4 and 7.4.9 of the

<b>Location of Cross Reference (page or section number)</b>	<b>Cross Reference as of June 2005 Conformed Tariff</b>	<b>Cross Reference as of Simplified &amp; Reorganized Tariff</b>
	the ISO Tariff	S&R Tariff
Section 4.2.3 on page 6	Section 2.3 and Section 4.4.4 of the ISO Tariff	Sections 7 and 7.4.11.3 of the S&R Tariff
Section 4.3 on page 6	Section 4.5 of the ISO Tariff	Section 7.4.6 and 7.4.6.1 of the S&R Tariff
Section 4.4 on page 7	Section 4.4.4 of the ISO Tariff	Section 7.4.11.3 of the S&R Tariff
Section 4.5 on page 7	Section 4.1.2, 4.6, 4.8, and 2.3.2.9.1	Sections 4.4.1.2, 4.4.6, 4.4.8, and 7.4.13.1 of the S&R Tariff
Section 4.7 on page 7	Section 4.3 of the ISO Tariff	Section 4.4.3 of the S&R Tariff
Section 5.1 on page 7; Section 5.2 on page 7	Section 4.8.4 of the ISO Tariff	Section 4.4.8.4 of the S&R Tariff
Section 5.3 on page 8	Section 4.8.4.3 of the ISO Tariff	Section 4.4.8.4.3 of the S&R Tariff
Section 7.1 on page 8	Section 13 of the ISO Tariff	Same
Section 9.1 on page 9	Section 14 of the ISO Tariff	Same
Section 10.1 on page 9	Section 15 of the ISO Tariff	Section 14.1 of the S&R Tariff
Section 11.1 on page 9	Section 17 of the ISO Tariff	Section 22.2 of the S&R Tariff
Section 11.2 on page 9	Section 20.1 of the ISO Tariff	Section 22.4 of the S&R Tariff
Schedule 3	Section 4.1.2 of the ISO Tariff	Section 4.4.1.2 of the S&R Tariff
Schedule 12, Section 1.3 and Section 2.6	Section 2.5.3.4 of the ISO Tariff	Section 8.2.3.4 of the S&R Tariff
<b>Interconnected Control Area Operating Agreement</b>		
Attachment A	References "Schedules and Bids Protocol" and "Scheduling Protocol"	Majority of SBP and SP deleted as redundant with or merged into various Sections of the S&R Tariff
<b>Responsible Participating Transmission Owner Agreement</b>		
Section D and E on page 1; Section 2.1 on page 3; Section 2.2.2 on page 4	Section 2.4.3 and 2.4.4 of the ISO Tariff	Sections 16.1 and 16.2 of the S&R Tariff
Section F on page 2; Section 3.3 on page 7;	Section 2.4.4.4.5 of the ISO Tariff	Section 16.2.3.4.5 of the S&R Tariff

<b>Location of Cross Reference (page or section number)</b>	<b>Cross Reference as of June 2005 Conformed Tariff</b>	<b>Cross Reference as of Simplified &amp; Reorganized Tariff</b>
Section 4.1 on page 8		
Section 2.3 on page 5; Section 3.5 on page 7; Section 9.2 on page 11	Reference to “Scheduling Coordinator Application Protocol”	Majority of SCAP merged with or deleted as redundant with Section 4 of the S&R Tariff
Section 2.7 on page 6	Section 2.4.3.1 of the ISO Tariff	Section 16.1.1 of the S&R Tariff
Section 3.1 on page 6 and 7	Section 2.2.7.2 and Section 20.3 of the ISO Tariff	Sections 4.5.4.2 and Section 20 of the S&R Tariff
Section 3.2 on page 7; Appendix B, row 3	Reference to “Schedules and Bids Protocol”	Majority of SBP deleted as redundant with or merged into various Sections of the S&R Tariff
Section 4.2 on page 8	Section 2.5.2.1 and 2.5.20 of the ISO Tariff	Section 8.2.1 and 8.6 of the S&R Tariff
Section 5.1 on page 9	Reference to “Outage Coordination Protocol”	Majority of OCP transferred to Section 9 of the S&R Tariff
Section 6.1 on page 9	Reference to “Demand Forecasting Protocol”	Majority of DFP merged into Section 19 of the S&R Tariff
Section 7.1 on page 9	Section 13.2(d) of the MP	Section 10.3.18.2 of the S&R Tariff
Section 9.1 on page 10	Section 2.6.2 of the Scheduling Coordinator Application Protocol	Section 4.5.1.1.6.2 of the S&R Tariff
Section 11.1 on page 12	Section 13 of the ISO Tariff	Same
Section 13.1 on page 12	Section 14 of the ISO Tariff	Same
Section 14.1 on page 12	Section 15 of the ISO Tariff	Section 14.1 of the S&R Tariff
Section 15.1 on page 13	Section 17 of the ISO Tariff	Section 22.2 of the S&R Tariff
Section 15.2 on page 13	Section 20.1 of the ISO Tariff	Section 22.4 of the S&R Tariff
<b>Scheduling Coordinator Agreement</b>		
Section A on page 1	Section 2.2.3 of the ISO Tariff	Section 4.5.1 of the S&R Tariff
Section 2C on page 2	Section 4 of the ISO Tariff	Section 4.4 of the S&R Tariff
Section 2D on page 2	Section 5 of the ISO Tariff	Section 4.6 of the S&R Tariff

<b>Location of Cross Reference (page or section number)</b>	<b>Cross Reference as of June 2005 Conformed Tariff</b>	<b>Cross Reference as of Simplified &amp; Reorganized Tariff</b>
	Tariff	Tariff
Section 6 on page 3	Section 11 of the ISO Tariff	Same

**ATTACHMENT B**

**TABLE OF SOURCES OF TARIFF SHEETS IDENTIFIED AS TO BE EFFECTIVE  
UPON NOTICE OF SOME FUTURE EVENT**

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
Third Revised Sheet No. 14	Upon Written Notice Provided by the ISO to FERC and Market Participants	Filing submitted on 10/29/02 in the Amendment No. 44 proceeding (Docket Nos. ER02-1656, et al.); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Original Sheet No. 14A	Upon Written Notice Provided by the ISO to FERC and Market Participants	Filing submitted on 10/29/02 in the Amendment No. 44 proceeding (Docket Nos. ER02-1656, et al.); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 20	Upon the date the ISO implements changes to its scheduling system to permit Section 2.2.9 of the ISO Tariff to go into effect	Filing submitted on 11/29/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102); Section 2.2.9 (contained on this sheet) has not yet gone into effect and the S&R Tariff sheet should reflect the same designation
Second Revised Sheet No. 20A	Upon the date the ISO implements changes to its scheduling system to permit Section 2.2.9 of the ISO Tariff to go into effect	Filing submitted on 11/29/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102); provisions on the tariff sheet became effective on 5/30/03, but the sheet was given its current effective date designation because it is a "rollover" sheet with regard to Sheet No. 20
First Revised Sheet No. 23	Upon Notice After October 13, 2000	Filing submitted on 5/2/00 in the Amendment No. 29 proceeding (Docket No. ER00-2383) (October 13, 2000 was the date on which a tariff update occurred); a market notice was issued on 10/16/00 stating that the upon-notice

Tariff Sheet in Current ISO Tariff	Wording of Effective Date Designation in Current ISO Tariff	Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status
		provisions on the tariff sheet would become effective on 10/26/00
Original Sheet No. 24A	Upon Notice After February 27, 2001	Filing submitted on 12/29/00 in the Amendment No. 35 proceeding (Docket No. ER01-836); Market Participants received automatically generated electronic RMR pre-dispatch notification on May 31, 2000 at 0500
Fourth Revised Sheet No. 26	Upon Notice After February 27, 2001	Filing submitted on 12/29/00 in the Amendment No. 35 proceeding (Docket No. ER01-836); Market Participants received automatically generated electronic RMR pre-dispatch notification on May 31, 2000 at 0500
First Revised Sheet No. 26A	Upon Notice After February 27, 2001	Filing submitted on 12/29/00 in the Amendment No. 35 proceeding (Docket No. ER01-836); Market Participants received automatically generated electronic RMR pre-dispatch notification on May 31, 2000 at 0500
Third Revised Sheet No. 35	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102); provisions on tariff sheet accepted by order issued on 10/28/04, <i>California Independent System Operator Corporation</i> , 109 FERC ¶ 61,087
Second Revised Sheet No. 35A	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102); provisions on the tariff sheet became effective on 2/21/04, but the sheet was given its current effective date designation because it is a “rollover” sheet with regard to Sheet No. 35
Third Revised Sheet No. 45	Upon Written Notice Provided by the ISO to FERC and Market	Filing submitted on 9/20/02 in the Amendment No. 44 proceeding (Docket Nos. ER02-1656, et al.);

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
	Participants	market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 67	Upon notice after May 19, 2001	Filing submitted on 3/20/01 in the Amendment No. 38 proceeding (Docket No. ER01-1579); a market notice was issued on 05/18/01 stating that the BEEP Split would become effective on 05/23/01
Original Sheet No. 67-A	Upon notice after May 19, 2001	Filing submitted on 3/20/01 in the Amendment No. 38 proceeding (Docket No. ER01-1579); a market notice was issued on 05/18/01 stating that the BEEP Split would become effective on 05/23/01
First Revised Sheet No. 68	Upon notice after May 19, 2001	Filing submitted on 3/20/01 in the Amendment No. 38 proceeding (Docket No. ER01-1579); a market notice was issued on 05/18/01 stating that the BEEP Split would become effective on 05/23/01
Original Sheet No. 68-A	Upon notice after May 19, 2001	Filing submitted on 3/20/01 in the Amendment No. 38 proceeding (Docket No. ER01-1579); a market notice was issued on 05/18/01 stating that the BEEP Split would become effective on 05/23/01
Second Revised Sheet No. 69	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 78	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
Second Revised Sheet No. 79	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 80	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 82	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 83	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 83A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 85	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 86	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of



Tariff Sheet in Current ISO Tariff	Wording of Effective Date Designation in Current ISO Tariff	Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status
		implementation of MRTU Phase 1B)
Second Revised Sheet No. 86A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 87	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Original Sheet No. 87-A	Upon notice after May 19, 2001	Filing submitted on 3/20/01 in the Amendment No. 38 proceeding (Docket No. ER01-1579); a market notice was issued on 05/18/01 stating that the BEEP Split would become effective on 05/23/01.
Third Revised Sheet No. 89	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 90	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 90A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 93	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
		notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fifth Revised Sheet No. 100	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 101	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 101A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Seventh Revised Sheet No. 103	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 103A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 104	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
First Revised Sheet No. 104B	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Original Sheet No. 104C	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 105	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 106	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 106A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fifth Revised Sheet No. 108	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Substitute Fourth Revised Sheet No. 109	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
		implementation of MRTU Phase 1B)
Ninth Revised Sheet No. 110	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Seventh Revised Sheet No. 110K	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 114	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 115	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 116	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fifth Revised Sheet No. 117	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fifth Revised Sheet No. 119	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
		notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 120	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 121	Upon Written Notice Provided by the ISO to FERC and Market Participants	Filing submitted on 9/20/02 in the Amendment No. 44 proceeding (Docket Nos. ER02-1656, et al.); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 123	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 124	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 125	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 134	Upon Written Notice Provided by the ISO to FERC and Market Participants	Filing submitted on 9/20/02 in the Amendment No. 44 proceeding (Docket Nos. ER02-1656, et al.); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
		MRTU Phase 1B)
First Revised Sheet No. 177	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Substitute Tenth Revised Sheet No. 184C	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Ninth Revised Sheet No. 184D.01	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Substitute Sixth Revised Sheet No. 184E	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Original Sheet No. 184E.01	Upon Notice After September 6, 2003	Filing submitted on 9/7/04 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fifth Revised Sheet No. 184F	Upon Notice by the ISO	Filing submitted on 5/11/04 in the Amendment No. 60 proceeding (Docket No. ER04-835); a market notice concerning change in CTs pursuant to Amendment No. 60 was issued on 8/26/04 and the change went into effect with MRTU Phase 1B on 10/1/04

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
Original Sheet No. 184F.01	Upon Notice by the ISO	Filing submitted on 5/11/04 in the Amendment No. 60 proceeding (Docket No. ER04-835); a market notice concerning the implementation of the SCUC application was issued on 8/23/04 and the software was implemented on 9/2/04 for Trade Date 9/3/04
Original Sheet No. 184F.02	10 Days After Notice by the ISO	Filing submitted on 5/11/04 in the Amendment No. 60 proceeding (Docket No. ER04-835); a market notice concerning the implementation of the SCUC application was issued on 8/23/04 and the software was implemented on 9/2/04 for Trade Date 9/3/04
Fourth Revised Sheet No. 184G	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 199	Upon Notice After September 5, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 201	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 202	Upon Notice After October 13, 2000	Filing submitted on 5/2/00 in the Amendment No. 29 proceeding (Docket No. ER00-2383) (October 13, 2000 was the date on which a tariff update occurred); a market notice was issued on 10/16/00 stating that the upon-notice provisions on the tariff sheet would

Tariff Sheet in Current ISO Tariff	Wording of Effective Date Designation in Current ISO Tariff	Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status
		become effective on 10/26/00
Third Revised Sheet No. 204B	One Day After Notice to Market Participants	Filing submitted on 2/14/05 in the Amendment No. 50 proceeding (Docket No. ER03-683); a market notice concerning the implementation of a daily gas index was issued on 6/22/05
First Revised Sheet No. 204B.01	One Day After Notice to Market Participants	Filing submitted on 2/17/05 in the Amendment No. 65 proceeding (Docket No. ER05-595); a market notice concerning the implementation of a daily gas index was issued on 6/22/05
First Revised Sheet No. 204C	One Day After Notice to Market Participants	Filing submitted on 2/14/05 in the Amendment No. 50 proceeding (Docket No. ER03-683); a market notice concerning the implementation of a daily gas index was issued on 6/22/05
Fifth Revised Sheet No. 205	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Substitute Second Revised Sheet No. 213	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Original Sheet No. 213.00	Upon Notice After September 6, 2003	Filing submitted on 9/7/04 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Original Sheet No. 213A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market



<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
		notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 214	Upon Notice After October 13, 2000	Filing submitted on 9/27/99 in the Amendment No. 22 proceeding (Docket No. ER99-4545) (October 13, 2000 was the date on which a tariff update occurred); Section 7.4.2.1.2 (contained on this tariff sheet) has not gone into effect and the S&R Tariff sheet should reflect the same designation
Fourth Revised Sheet No. 246	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 246A	Upon Written Notice Provided by the ISO to FERC and Market Participants	Filing submitted on 9/20/02 in the Amendment No. 44 proceeding (Docket Nos. ER02-1656, et al.); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Substitute Second Revised Sheet No. 247.01	Upon Notice On or After May 1, 2004	Filing submitted on 3/2/04 in the Amendment No. 58 proceeding (Docket No. ER04-609); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Substitute First Revised Sheet No. 247.02	Upon Notice On or After May 1, 2004	Filing submitted on 3/2/04 in the Amendment No. 58 proceeding (Docket No. ER04-609); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fifth Revised Sheet No. 247A	Upon Notice On or After May 1, 2004	Filing submitted on 9/7/04 in the Amendment No. 58 proceeding (Docket No. ER04-609); the Uninstructed Deviation Penalty

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
		provisions in the subsections of Section 11.2.4.1.2 (contained on this sheet) have not gone into effect and the S&R Tariff sheet should reflect the same designation
Third Revised Sheet No. 247B	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); the Uninstructed Deviation Penalty provisions in the subsections of Section 11.2.4.1.2 (contained on this sheet) have not gone into effect and the S&R Tariff sheet should reflect the same designation
Substitute Fifth Revised Sheet No. 247C	Upon Notice On or After May 1, 2004	Filing submitted on 3/2/04 in the Amendment No. 58 proceeding (Docket No. ER04-609); the Uninstructed Deviation Penalty provisions in the subsections of Section 11.2.4.1.2 (contained on this sheet) have not gone into effect and the S&R Tariff sheet should reflect the same designation
Original Sheet No. 247C.00	Upon Notice On or After May 1, 2004	Filing submitted on 9/7/04 in the Amendment No. 58 proceeding (Docket No. ER04-609); the Uninstructed Deviation Penalty provisions in the subsections of Section 11.2.4.1.2 (contained on this sheet) have not gone into effect and the S&R Tariff sheet should reflect the same designation
Third Revised Sheet No. 247C.01	Upon Notice On or After May 1, 2004	Filing submitted on 9/7/04 in the Amendment No. 58 proceeding (Docket No. ER04-609); the Uninstructed Deviation Penalty provisions in the subsections of Section 11.2.4.1.2 (contained on this sheet) have not gone into effect and the S&R Tariff sheet should reflect the same designation

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
Substitute Fourth Revised Sheet No. 247D	Upon Notice	Filing submitted on 8/3/04 in the Amendment No. 62 proceeding (Docket No. ER04-1087); the Uninstructed Deviation Penalty provisions in the subsections of Section 11.2.4.1.2 (contained on this sheet) have not gone into effect and the S&R Tariff sheet should reflect the same designation
Original Sheet No. 247D.01	Upon Notice	Filing submitted on 11/1/04 in the Amendment No. 62 proceeding (Docket No. ER04-1087); the Uninstructed Deviation Penalty provisions in the subsections of Section 11.2.4.1.2 (contained on this sheet) have not gone into effect and the S&R Tariff sheet should reflect the same designation
Substitute Sixth Revised Sheet No. 250	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Substitute First Revised Sheet No. 250.00	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 250.01	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Seventh Revised Sheet No. 250A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of

Tariff Sheet in Current ISO Tariff	Wording of Effective Date Designation in Current ISO Tariff	Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status
		implementation of MRTU Phase 1B)
Second Revised Sheet No. 250B	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 250C	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 256	Upon notice	Filing submitted on 6/10/03 in the Amendment No. 53 proceeding (Docket No. ER03-942); a market notice was issued on 03/10/04 stating that charge types would become effective beginning with the January 2004 Preliminary Invoice on 03/25/04
Second Revised Sheet No. 257	November 14, 2003 or upon Order by FERC	Filing submitted on 4/15/03 in the Amendment No. 51 proceeding (Docket No. ER03-746); provisions on tariff sheet accepted by order issued on 11/14/03, <i>California Independent System Operator Corporation</i> , 105 FERC ¶ 61,203
First Revised Sheet No. 260	November 14, 2003 or upon Order by FERC	Filing submitted on 4/15/03 in the Amendment No. 51 proceeding (Docket No. ER03-746); provisions on tariff sheet accepted by order issued on 11/14/03, <i>California Independent System Operator Corporation</i> , 105 FERC ¶ 61,203
Second Revised Sheet No. 262	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102); provisions on tariff sheet accepted by order issued on 10/28/04, <i>California Independent System Operator</i>

Tariff Sheet in Current ISO Tariff	Wording of Effective Date Designation in Current ISO Tariff	Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status
		<i>Corporation</i> , 109 FERC ¶ 61,087
Original Sheet No. 262.01	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102); the tariff sheet was given its current effective date designation because it is a “rollover” sheet with regard to Sheet No. 262
Second Revised Sheet No. 297O	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 297P	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 305	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 306	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Substitute Fourth Revised Sheet No. 308	Upon Notice On or After May 1, 2004	Filing submitted on 6/17/04 in the Amendment No. 58 proceeding (Docket No. ER04-609); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Original Sheet No. 308.01	Upon Notice On or	Filing submitted on 3/19/04 in the Amendment No. 58 proceeding

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
	After May 1, 2004	(Docket No. ER04-609); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 311.01	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 316	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 316A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 322	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 334.01	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fifth Revised Sheet No. 337	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
Substitute Sixth Revised Sheet No. 340	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 344A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Substitute Third Revised Sheet No. 345	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Original Sheet No. 345A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 348	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 352	Upon Notice On or After May 1, 2004	Filing submitted on 3/2/04 in the Amendment No. 58 proceeding (Docket No. ER04-609); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 352A	Upon Notice On or After May 1, 2004	Filing submitted on 3/2/04 in the Amendment No. 58 proceeding (Docket No. ER04-609); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
		implementation of MRTU Phase 1B)
Original Sheet No. 357A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 460	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 466	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 469	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 470	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 475	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 477	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market



<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
		notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 478	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 479	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 479A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 480	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 480A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 481	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
Second Revised Sheet No. 482	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 483	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Original Sheet No. 483A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 484	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 485	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 489	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 491	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102); provisions on tariff sheet accepted by order issued on 10/28/04, <i>California</i>

Tariff Sheet in Current ISO Tariff	Wording of Effective Date Designation in Current ISO Tariff	Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status
		<i>Independent System Operator Corporation, 109 FERC ¶ 61,087</i>
Second Revised Sheet No. 496	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102); provisions on tariff sheet accepted by order issued on 10/28/04, <i>California Independent System Operator Corporation, 109 FERC ¶ 61,087</i>
Second Revised Sheet No. 497	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102); provisions on tariff sheet accepted by order issued on 10/28/04, <i>California Independent System Operator Corporation, 109 FERC ¶ 61,087</i>
Second Revised Sheet No. 499	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102); provisions on tariff sheet accepted by order issued on 10/28/04, <i>California Independent System Operator Corporation, 109 FERC ¶ 61,087</i>
Second Revised Sheet No. 500	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102); provisions on tariff sheet accepted by order issued on 10/28/04, <i>California Independent System Operator Corporation, 109 FERC ¶ 61,087</i>
Third Revised Sheet No. 508B	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 508D	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of

Tariff Sheet in Current ISO Tariff	Wording of Effective Date Designation in Current ISO Tariff	Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status
		implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 508G	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 508G.01	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 508J	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 541	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 541A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 542	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 543	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
		notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 544	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Original Sheet No. 544A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Substitute First Revised Sheet No. 553	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 555	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 556	Upon Written Notice Provided by the ISO to FERC and Market Participants	Filing submitted on 9/20/02 in the Amendment No. 44 proceeding (Docket Nos. ER02-1656, et al.); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 557	Upon Written Notice Provided by the ISO to FERC and Market Participants	Filing submitted on 9/20/02 in the Amendment No. 44 proceeding; market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B) (Docket Nos.

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
		ER02-1656, et al.);
Fourth Revised Sheet No. 558	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 559	Upon Written Notice Provided by the ISO to FERC and Market Participants	Filing submitted on 9/20/02 in the Amendment No. 44 proceeding (Docket Nos. ER02-1656, et al.); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 560	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 561	Upon Written Notice Provided by the ISO to FERC and Market Participants	Filing submitted on 9/20/02 in the Amendment No. 44 proceeding (Docket Nos. ER02-1656, et al.); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 562	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 563	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
Third Revised Sheet No. 563A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Sixth Revised Sheet No. 564	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 564A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 565	Upon Notice	Filing submitted on 8/3/04 in the Amendment No. 62 proceeding (Docket No. ER04-1087); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Original Sheet No. 565.01	Upon Notice After September 6, 2003	Filing submitted on 11/21/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Original Sheet No. 565A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 565B	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
		implementation of MRTU Phase 1B)
Original Sheet No. 565C	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 610	Upon Notice After October 13, 2000	Filing submitted on 9/27/99 in the Amendment No. 22 proceeding (Docket No. ER99-4545) (October 13, 2000 was the date on which a tariff update occurred); a market notice was issued on 1/24/00 stating that the upon-notice provisions would become effective on 1/31/00 for Trade Date 2/1/00
Third Revised Sheet No. 629	Upon Written Notice Provided by the ISO to FERC and Market Participants	Filing submitted on 9/20/02 in the Amendment No. 44 proceeding (Docket Nos. ER02-1656, et al.); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 629A	Upon Written Notice Provided by the ISO to FERC and Market Participants	Filing submitted on 9/20/02 in the Amendment No. 44 proceeding (Docket Nos. ER02-1656, et al.); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fifth Revised Sheet No. 630	Upon Written Notice Provided by the ISO to FERC and Market Participants	Filing submitted on 9/20/02 in the Amendment No. 44 proceeding (Docket Nos. ER02-1656, et al.); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fifth Revised Sheet No. 648	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102); provisions on tariff sheet accepted by order



Tariff Sheet in Current ISO Tariff	Wording of Effective Date Designation in Current ISO Tariff	Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status
		issued on 10/28/04, <i>California Independent System Operator Corporation</i> , 109 FERC ¶ 61,087
First Revised Sheet No. 648A	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102); provisions on tariff sheet accepted by order issued on 10/28/04, <i>California Independent System Operator Corporation</i> , 109 FERC ¶ 61,087
Fifth Revised Sheet No. 649	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102); provisions on tariff sheet accepted by order issued on 10/28/04, <i>California Independent System Operator Corporation</i> , 109 FERC ¶ 61,087
Third Revised Sheet No. 657	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 657A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 658	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 659	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
		implementation of MRTU Phase 1B)
Third Revised Sheet No. 660	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 689	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 690	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Substitute Second Revised Sheet No. 691	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 694	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Original Sheet No. 694A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Original Sheet No. 694B	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
		notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 694C	Upon Notice On or After May 1, 2004	Filing submitted on 9/7/04 in the Amendment No. 58 proceeding (Docket No. ER04-609); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 694D	Upon Notice On or After May 1, 2004	Filing submitted on 9/7/04 in the Amendment No. 58 proceeding (Docket No. ER04-609); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 694G	Upon Notice	Filing submitted on 8/3/04 in the Amendment No. 62 proceeding (Docket No. ER04-1087); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Substitute Original Sheet No. 694H	Upon Notice After September 6, 2003	Filing submitted on 11/21/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Second Revised Sheet No. 696	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 697	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
First Revised Sheet No. 697A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Fourth Revised Sheet No. 698	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 699	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
Third Revised Sheet No. 700	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 700A	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 700B	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 700C	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of

Tariff Sheet in Current ISO Tariff	Wording of Effective Date Designation in Current ISO Tariff	Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status
		implementation of MRTU Phase 1B)
First Revised Sheet No. 700D	Upon Notice After September 6, 2003	Filing submitted on 7/8/03 in the Amendment No. 54 proceeding (Docket No. ER03-1046); market notices were issued on 9/17/04 and 10/1/04 (the latter being the date of implementation of MRTU Phase 1B)
First Revised Sheet No. 858	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102); the effective date for FERC's enforcement of the Enforcement Protocol (contained on Sheet Nos. 858 through 878) is 10/28/04 [ <i>i.e.</i> , the date that FERC issued <i>California Independent System Operator Corporation</i> , 109 FERC 61,087]; however, a future FERC order may authorize the ISO's MMU to enforce the Enforcement Protocol, effective on a date to be provided in that FERC order
Substitute First Revised Sheet No. 859	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Second Substitute Original Sheet No. 859A	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Original Sheet No. 859B	Upon Commission Approval	Filing submitted on 8/1/05 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
First Revised Sheet No. 860	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
		See entry for Sheet No. 858, above
Substitute First Revised Sheet No. 861	Upon Commission Approval	Filing submitted on 5/21/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Second Substitute First Revised Sheet No. 862	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Second Substitute First Revised Sheet No. 863	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Second Substitute First Revised Sheet No. 864	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Original Sheet No. 864A	Upon Commission Approval	Filing submitted on 4/25/05 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Substitute First Revised Sheet No. 865	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Substitute First Revised Sheet No. 866	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Second Substitute First Revised Sheet No. 867	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
		(Docket No. ER03-1102)  See entry for Sheet No. 858, above
Original Sheet No. 867A	Upon Commission Approval	Filing submitted on 11/29/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Substitute First Revised Sheet No. 868	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Substitute First Revised Sheet No. 869	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Substitute First Revised Sheet No. 870	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Second Substitute First Revised Sheet No. 871	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Original Sheet No. 871A	Upon Commission Approval	Filing submitted on 8/1/05 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Original Sheet No. 871B	Upon Commission Approval	Filing submitted on 8/1/05 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Substitute First Revised Sheet	Upon Commission	Filing submitted on 5/20/04 in the

<b>Tariff Sheet in Current ISO Tariff</b>	<b>Wording of Effective Date Designation in Current ISO Tariff</b>	<b>Source of Effective Date Designation; Date(s) of Notice(s) of Effectiveness, or Current Status</b>
No. 872	Approval	Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Second Substitute First Revised Sheet No. 873	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
Original Sheet No. 873A	Upon Commission Approval	Filing submitted on 11/29/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
First Revised Sheet No. 874	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
First Revised Sheet No. 875	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
First Revised Sheet No. 876	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
First Revised Sheet No. 877	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above
First Revised Sheet No. 878	Upon Commission Approval	Filing submitted on 5/20/04 in the Amendment No. 55 proceeding (Docket No. ER03-1102)  See entry for Sheet No. 858, above



