UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Geysers Power Company)	Docket Nos. ER02-188-001
)	ER02-236-002
)	ER02-407-002

COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION

On September 7, 2004, Geysers Power Company, LLC (Geysers Power) filed a refund report in compliance with the Commission's February 27, 2003 Order in Geysers Power Company, LLC, 102 FERC ¶ 61, 221 (2003). Pursuant to the Commission's September 10, 2004 Notice, the California Independent System Operator Corporation (CAISO) submits the following comment.

Due to an apparent inadvertent word processing conversion error, the refund report contains several errors. Several of the Revenue Adjustment and Change columns containing the line "Interest charge on Current Mo Underpayment" were blank instead of having the correct interest amount originally paid filled it. As a result of both columns being blank, the "Diff" column or the refund column was zero as well, so this did not change the actual refund amount. The CAISO has informed Geysers of the errors and Geysers has indicated it intends to submit a corrected filing. As of the date of this filing, however, Geysers has not submitted an errata filing.

The CAISO is not protesting the refund report filing. However, the CAISO desires that public information be correct.

Respectfully submitted,

/s Sidney L. Mannheim

Sidney L. Mannheim Regulatory Counsel California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630

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Counsel for the California Independent System Operator Corporation

Date: September 28, 2004

CERTIFICATE OF SERVICE

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

Dated at Folsom, CA, this 28th day of September 2004.

<u>/s Sidney L. Mannheim</u> Sidney L.Mannheim



September 28, 2004

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

> Re: Geysers Power Company Docket No. ER02-188-001 ER02-236-002 ER02-407-002

Dear Secretary Salas:

Enclosed please find an electronic filing of the Comments of the California Independent System Operator Corporation. Thank you for your attention to this filing.

Respectfully submitted,

<u>/s Sidney L. Mannheim</u> Sidney L. Mannheim

Counsel for the California Independent System Operator Corporation