June 6, 2002

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

Re: Turlock Irrigation District v. California Independent System Operator Corporation, Docket No. EL99-93-000

Dear Secretary Salas:

Enclosed for filing please find one original and fourteen copies of the Initial Brief of the California Independent System Operator Corporation in the above-captioned proceeding.

Two additional copies of the filing are also enclosed. Please stamp the additional copies with the date and time filed and return them to the messenger.

Respectfully submitted,

Michael E. Ward Counsel for the California Independent System Operator Corporation