November 9, 2001

The Honorable David P. Boergers Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426

Re: Electricity Market Design and Structure Docket No. RM01-12-000

Dear Secretary Boergers:

Enclosed for filing please find the original and fourteen copies of the Comments of the California Independent System Operator Corporation on the Commission's RTO Workshop, submitted in the above-captioned docket.

Two additional copies of the enclosed filing are also provided to be time-stamped and returned to our messenger. Please contact the undersigned with any questions. Thank you for your assistance in this matter.

Respectfully submitted,

Edward Berlin Bradley R. Miliauskas Swidler Berlin Shereff Friedman, LLP 3000 K Street, N.W. Washington, D.C. 20007

Counsel for the California Independent System Operator Corporation

CERTIFICATE OF SERVICE

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

Dated at Washington, D.C., this 9th day of November, 2001.

Bradley R. Miliauskas Swidler Berlin Shereff Friedman, LLP 3000 K Street, N.W. Washington, D.C. 20007