



January 14, 2009

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Subject: Draft Resolution E-4220
Response of the California Independent System Operator
Corporation

Through this response, the California Independent System Operator Corporation (CAISO) expresses its support for Commission adoption of draft Resolution E-4220, which calls for approval of the proposals by PG&E, SCE and SDG&E to modify the Base Interruptible Program (BIP) to add a new trigger condition.

As explained in the draft resolution, the utility proposals are intended to implement an “interim solution to a long-standing debate on how best to align emergency-triggered programs with CAISO operational practices.” (draft Resolution at p. 1.) The draft resolution also notes that the CAISO has expressed its support for the proposed BIP trigger modification. The CAISO has done so by way of letters of support dated December 2, 2008 letter, which the CAISO submitted for each respective utility advice letter filing.

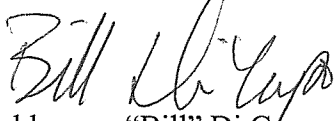
The draft Resolution also correctly notes that, upon modification of the BIP as proposed, the CAISO has agreed to support continued inclusion of BIP capacity as Resource Adequacy (RA) capacity, a position which the CAISO tethers to commitment

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by the utilities, CMTA, CLECA and other interested parties to continue to engage in meaningful discussions to promote the voluntary transition of large customers to a forward-bid paradigm that incorporates an option for large customers to participate in a viable, price-responsive demand response program during the 2010 to 2011 timeframe. (See draft Resolution at p. 3.)

The CAISO supports the BIP modifications and actions set forth in the draft Resolution and strongly encourages approval by the Commission.

Respectfully submitted,



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R.07-01-041

A.08-06-001

A.08-06-002


A.08-06-003

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2009, I served, on the Service List for Consolidated Proceedings A08-06-001, A08-06-002, A08-06-003 and R.07-01-041 by electronic mail, and United States mail a copy of the foregoing:

RESPONSE OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR TO DRAFT RESOLUTION E-4220

Executed on January 14, 2009, at Folsom,
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