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August 6, 2002

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 Nos. ER02-250-000 and ER02-527-000

Pacific Gas and Electric Company Docket No. ER02-479-000

Dear Secretary Salas:

Enclosed please find the Joint Motion to Suspend the Procedural Schedule and Withdraw Request for Settlement Judge in the above-captioned matter. Two courtesy copies of this filing are being provided to Judge Bobbie J. McCartney.

Two additional copies of this filing are enclosed to be stamped with the date and time of filing and returned to our messenger. If there are any questions concerning this filing, please contact the undersigned.

Respectfully submitted,

Juli**j**a Moore

Counsel for the California Independent System Operator Corporation

UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

| California Independent System Operator Corporation |) Docket Nos. | ER02-250-000 ER02-527-000 |
|---|------------------------|------------------------------|
| Pacific Gas and Electric Company |)) Docket No.) | ER02-479-000 |

JOINT MOTION TO STAY PROCEDURAL SCHEDULE AND WITHDRAW REQUEST FOR SETTLEMENT JUDGE

To: The Honorable Bobbie J. McCartney Presiding Administrative Law Judge

Pursuant to Rule 212 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212 (2001), the California Independent System Operator Corporation ("ISO") submits this Joint Motion requesting: (1) the withdrawal of the parties' request for the appointment of a settlement judge in the above captioned proceedings, and (2) a stay of the remaining procedural schedule in the same dockets. This motion is supported by all active parties to this proceeding as well as Commission Trial Staff, and is unopposed by any party, except that San Diego Gas & Electric ("SDG&E") would exempt one issue from the stay of the procedural schedule.

1. The active parties have agreed to a settlement in principle that would resolve all outstanding issues in the above captioned dockets.¹ The active parties believe that it will be possible to file a full settlement agreement with the Presiding Judge for certification to the Commission within 30 days of this motion.

There remains one issue currently of interest only to SDG&E and the ISO. The ISO anticipates that this issue will be resolved on a separate track presently. Neither SDG&E not the ISO wish this single item to forestall a more general settlement.

- 2. In light of the agreement to a settlement in principle, the parties believe that a settlement judge is no longer needed and accordingly withdraw the joint motion requesting the appointment of a settlement judge filed on June 28, 2002.²
- 3. In light of the agreement to a settlement in principle, parties request that the remaining procedural schedule for the above-captioned dockets be stayed.³

Respectfully submitted,

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Dated: August 6, 2002

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The Motion of June 28 also requested that discovery be suspended among all parties to this proceeding, with the exception of discovery between the ISO and SDG&E (June 28 Motion at 3). The ISO does not object to responding to the discovery SDG&E has posed on it thus far.

SDG&E submits that the procedural schedule should remain in effect for purposes of enforcing the outstanding discovery and, if necessary, resolving whether its self-provision of Imbalance Energy should be credited against the GMC. The ISO intends that this matter be resolved on a separate track.

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 dockets.

Dated at Washington, DC, on this 6^h day of August, 2002.

Julia Moore