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March 16, 2007

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

**Re: California Independent System Operator Corporation
Docket Nos. ER03-746-000, et al.
San Diego Gas & Electric Co., et al.
Docket Nos. EL00-95-081, et al.
California Independent System Operator Corporation and
California Power Exchange
Docket Nos. EL00-98-069, et al.**

Dear Secretary Salas:

Enclosed please find one original and fourteen copies of the Thirty-Third Status Report of the California Independent System Operator Corporation on Re-Run Activity filed in the above-captioned dockets.

Also enclosed are two extra copies of this cover letter to be time/date stamped and returned to us by the messenger. Thank you for your assistance. Please contact the undersigned if you have any questions regarding this filing.

Sincerely,



Michael Kunselman

Counsel for the California Independent
System Operator Corporation

Enclosures

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

California Independent System Operator Corporation)	Docket No.	ER03-746-000
)		
)		
San Diego Gas & Electric Company, Complainant,)		
)		
v.)	Docket Nos.	EL00-95-081
)		EL00-95-074
Sellers of Energy and Ancillary Services Into Markets Operated by the California Independent System Operator and the California Power Exchange, Respondents.)		EL00-95-086
)		
Investigation of Practices of the California Independent System Operator and the California Power Exchange)	Docket Nos.	EL00-98-069
)		EL00-98-062
)		EL00-98-073

(not consolidated)

**THIRTY-THIRD STATUS REPORT OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION ON
SETTLEMENT RE-RUN ACTIVITY**

Pursuant to the Order Granting Clarification and Granting and Denying Rehearing of the Federal Energy Regulatory Commission ("Commission" or "FERC"), issued on February 3, 2004, in the above-captioned dockets ("February 3 Order"), the California Independent System Operator Corporation ("ISO") hereby provides its thirty-third status report.

The following sections of this report contain new information: Section II.A (Fuel Cost Allowance Data, regarding the schedule for the next review period), Section II.C (Cost-Based Recovery Filings, regarding coordination with the PX), Section II.D (Interest Calculations, regarding interest on prep reruns) and Section

III (Estimated Schedule for Completion of the Refund Re-run Activity, including a chart of past review periods for various components of the refund calculations).

Any comments on this report that are received by April 1 will be considered for incorporation in next month's status report, scheduled to be filed on April 10.

I. BACKGROUND¹

In the February 3 Order,² the Commission directed the ISO³ "to submit to the Commission on a monthly basis, beginning on February 10, 2004, a report detailing the status of the preparatory adjustment re-runs and the dates that it expects to complete both the preparatory re-runs and the settlements and billing process for calculating refunds." February 3 Order at P 21. The first such status report was filed with the Commission on February 9, 2004. This filing is the thirty-third such report required by that Commission Order. While the preparatory and FERC refund re-runs are now complete, the ISO will continue to provide status reports throughout the resettlement and financial phases of the process because the ISO believes that these reports have been a valuable tool

¹ In its October 16, 2003 Order on Rehearing, 105 FERC ¶ 61,066 (2003), the Commission ordered the ISO to file within five months of the date of the order the results of the preparatory re-runs along with the appropriate explanations. The ISO considers that this directive has been overtaken by FERC's later recognition in the Amendment No. 51 proceeding that the ISO could not possibly comply with the deadline in the October 16 Rehearing order, as well as the deadlines in the previous Amendment 51 orders. The ISO is endeavoring to comply, however, with FERC's directive that the ISO work as fast as practicable, keep the parties well informed, and file monthly status reports. For this reason, in addition to the Amendment No. 51 docket, the ISO is also filing this report in the dockets associated with the California refund proceeding.

² 106 FERC 61,099 (2004). The context of the February 3 Order in prior versions of the ISO's status report.

³ Capitalized terms not otherwise defined herein shall have the meanings set forth in the Master Definitions Supplement, Appendix A to the ISO Tariff.

for communicating with the Commission and Market Participants, in addition to meeting the Commission-mandated reporting requirement.

II. CURRENT STATUS OF RE-RUN ACTIVITY

The ISO has finished publishing settlement statements reflecting the refund rerun, and is currently in the midst of the financial adjustment phase, in which the ISO is making adjustments to its refund rerun settlement data to account for fuel cost allowance offsets, emissions offsets, cost-based recovery offsets, and interest on amounts unpaid and refunds. As of the date of this report, the ISO has finished processing activities associated with the emissions offsets, is actively working on the fuel cost offset and cost-based recovery, and has distributed several interest calculations as well.

The ISO completed the first portion of the fuel cost adjustment calculations, which is determination of allocation percentages for each Scheduling Coordinator (as discussed in greater detail below), and distributed those calculations to Scheduling Coordinators for their review on December 22, 2005.⁴ The ISO has made several adjustments to the fuel cost allocation percentages subsequent to this first distribution, based on comments received from several parties as well as internal review.⁵ Most recently, the ISO made corrections to the fuel cost percentages in order to ensure that fuel costs are allocated to entities only during those intervals in which they were “mitigated.”

⁴ The calculations were placed on a CD and sent via Federal Express, and were received by Scheduling Coordinators on December 23, 2005.

⁵ The nature of these adjustments was discussed in prior refund status reports.

The ISO distributed updated fuel cost allocation percentages on February 12, 2007, with comments due on February 26. The ISO received comments from one party, PG&E, who raised one issue relating to the inclusion of a particular Scheduling Coordinator in the calculations. PG&E also requested that the CAISO provide the dollar amount of FCAs in each interval where FCAs are allocated among market participants. In a letter to PG&E, copied to listserv, dated March 1, 2007, the ISO indicated that it remove the Scheduling Coordinator ID identified by PG&E from the fuel cost calculations, and would provide the interval allocation data requested by PG&E.

On May 12, 2006, the Commission issued an order setting forth an allocation methodology for the offsets associated with the cost filings.⁶ The Commission directed the ISO to allocate these offsets to parties in proportion to the net refunds they are owed. In its last status report, the ISO noted that it had had discussions with several parties, including the California Parties, the Competitive Supplier Group, and the PX, concerning the issue of how to account for refunds in both the ISO and PX markets in performing the cost-based filing allocation, and that based on these discussions, the ISO had developed a methodology to account for refunds in both the ISO and PX markets.

On August 23, 2006, the Commission issued an order addressing disputes filed by parties on December 1, 2005 relating to the ISO and PX rerun data.⁷ In

⁶ 115 FERC ¶ 61,171 (2006) ("May 12 Order").

⁷ 116 FERC ¶ 61,167 (2006) ("August 23 Order").

that order, the Commission also addressed the issues raised by Ernst & Young in its fuel cost audit reports.

On November 2, 2006, the Commission issued an order on the cost-based compliance filings made by Avista, Portland General, Powerex, Sempra and TransAlta.⁸ The Commission accepted Avista's filing, accepted Portland General's and Powerex's filings, subject to modification, and rejected the compliance filings made by Sempra and TransAlta. The Commission directed Avista, Portland General and Powerex to submit final cost offset data to the ISO within 15 days of the date of this order.

A. FUEL COST ALLOWANCE DATA

As explained in greater detail in previous status reports, the ISO has pursued a two-track approach with respect to calculating fuel cost allowances. First, the ISO calculated, for each entity that participated in the ISO's markets during the Refund Period (*i.e.*, October 2, 2000 through June 20, 2001), the percentage of the total fuel cost claim amounts to be allocated to these entities for each hour, consistent with the methodology approved by the Commission for doing so. Second, the ISO will use these validated numbers to calculate the final allocation percentages, as well as the final allocation of actual dollar amounts.

As noted above, on December 22, 2005, the ISO distributed the first set of fuel cost allocation percentages to parties, and received comments from several parties. The ISO made several revisions to this data set and distributed the revised allocation percentages for another round of review on June 1, 2006.

⁸ 117 FERC ¶ 61,151 (2006).

Since then, the ISO made four further modifications to the fuel cost percentages: (1) using information from the PX, the ISO made corrections to the fuel cost allocation percentages for ten hours during the Refund Period; (2) the ISO made a modification to the fuel cost data in order to remove the assignment of fuel costs to an internal ISO SC ID; (3) based on comments received from APX, the ISO made revisions necessary to ensure that fuel costs are allocated to entities only during those intervals in which they were “mitigated;” and (4) the ISO identified and corrected an error relating to fuel cost percentages for the month of February, 2001. The first three revisions are described in the text files on the CD provided to parties on February 12. The fourth revision was described in the February 2007 status report.

In the last status report, the ISO also stated that it had recently recognized a potential problem with respect to fuel cost claims made by two parties, Midway Sunset Cogeneration Company (“Midway Sunset”) and Nevada Power Company (“Nevada”). The ISO explained that both of these parties transacted in the ISO markets through the PX, and that some of the Uninstructed Energy sales made by these parties through the PX were made during intervals in which PX net sales were less than the sales of Midway Sunset and Nevada Power, and thus, paying the full FCA credit directly to Midway Sunset and Nevada Power in the ISO markets would allocate too much of the corresponding offset to other ISO Scheduling Coordinators, and too little to PX participants. Based on discussions held with the PX, the ISO indicated that it would adopt the following methodology. In those intervals in which the total fuel costs relating to Uninstructed Energy

claimed by Midway Sunset and Nevada Power exceeds the amount of positive Uninstructed Energy provided from the PX portfolio for the applicable Region, the ISO will reduce the FCA claim allocated to the ISO market pro rata. The portion of the FCA claim not allocated to the ISO markets will be processed through the PX, which will allocate such amounts to its own participants.

The ISO is currently in the process of using the fuel cost percentages, revised as discussed above, to determine each party's respective allocation amount. The ISO is on track to distribute this data by March 23, 2007, with comments due from parties on April 6, 2007. This represents a delay of six business days from the schedule that was expected in February, and detailed in the February status report.

B. EMISSIONS OFFSETS

The ISO's work on the Emissions offset is completed and uploaded. By way of background, in the Findings of Fact in the Refund proceeding⁹ and again in the Commission's Order of March 26, 2003,¹⁰ the Commission found that 3 entities, Duke, Dynegy, and Williams, had supported their requested emissions allowance. Three other entities – Reliant, the City of Pasadena, and the Los Angeles Department of Water and Power ("LADWP") – were ordered to reallocate and recalculate their emissions allowances.¹¹ Also, in the

⁹ Certification of Proposed Findings on California Refund Liability, Issued December 12, 2002, PP 729-760.

¹⁰ 102 FERC ¶ 61,317 (2003) item BB.

¹¹ With respect to Reliant, the Commission, in its March 26 Order, accepted the Presiding Judge's finding that although Reliant would be required to recalculate its emissions on a pro-rata

Commission's October 16, 2003 order, the Commission clarified that emissions offsets would be recoverable only for mitigated intervals.

On September 20, 2005, the Commission issued an order accepting the recalculated emissions claims of Pasadena and LADWP. 112 FERC ¶ 61,323 (2005). The Commission also acknowledged receipt of Reliant's informational filing detailing a pro rata allocation of its emissions costs offset among mitigated and non-mitigated intervals. *Id.* at P 40.

In its most recent status reports, the ISO noted that it had received revised emissions claims for all outstanding entities, and will incorporate these data into the financial adjustment phase.

On April 25, 2006, the ISO distributed data reflecting the allocation percentages for emissions for each party during the refund proceeding. The ISO provided a several week period for party comments on these data, and received none. On September 21, 2006, the ISO circulated the final approved emissions claim amounts that it will use in its calculations, as well as an explanation of the methodology for determining the resulting refund offsets. As explained in the market notice accompanying that distribution, the ISO intends to use these claim amounts, along with the percentages distributed on April 25, 2006, to determine the final refund offsets associated with approved emissions claims.

basis, Reliant would be permitted to use the California Generators' existing pro rata allocation exhibit, and would not be required to re-file that information.

C. COST-BASED RECOVERY FILINGS

The ISO has received from various parties all of the cost-based filing data mandated by the Commission in its orders of January 26, 2006 and November 2, 2006. In the February 2007 status report, the ISO included a list of the claims that it intended to process.

As also noted above, the Commission issued an order approving an allocation methodology for cost filings on May 12, 2006. Therein, the Commission concluded that offsets from cost filings should be allocated to purchasers based on their net refunds. In its June 2006 status report, the ISO explained the methodology that it intends to adopt in order to implement the Commission's methodology. However, after considering questions posed by several parties, the ISO recognized that certain portions of its methodology discussion in the June 2006 status report should be clarified. Therefore, the ISO made several modifications to its methodology, which it set forth in its status report filed July 10, 2006 in these dockets (pages 10-12).

In its last several status reports, the ISO also noted that there is an important issue about how to account for refunds in both the ISO and PX markets when allocating the cost-based filing offsets. The ISO has had discussions concerning this issue with several parties, including the California Parties, the Competitive Supplier Group, and the PX. Recently, the ISO and PX agreed to a methodology for accounting for net refunds in both the ISO and PX markets, which the ISO set forth in its last status report. To summarize, the ISO and PX

will use their respective refund calculations to determine the refund position of each entity that transacted in their respective markets during the Refund Period, pursuant to the methodology mandated by the Commission. The ISO and PX will then net between their two markets the refund positions of all parties, and allocate the cost filings based on these net positions.

The ISO estimates that it will require five business weeks to complete the cost filing calculations and distribute the offset data for parties to review. As with other major data distributions, the ISO plans to provide parties a three week period in which to review these calculations and provide any comments. The ISO will issue a market notice, which will be posted on the listserv, when this data is available. The ISO will ask that comments on this data be directed to the ISO and PX jointly, as both entities plan to work together on finalizing these numbers.

D. INTEREST CALCULATIONS

As noted in previous reports, the ISO has made several distributions of interest data to parties. First, on January 12, 2006, the ISO distributed to parties via the listserv a spreadsheet showing the reversal of all interest amounts originally charged to entities that transacted with the ISO during the Refund Period, along with an explanatory memorandum.

The calculation of interest on unpaid invoices during the Refund Period, pursuant to the methodology approved by the Commission was made available on May 1, 2006. The ISO also posted to listserv on that date a memorandum

explaining these calculations. In response to comments from the parties, the ISO revised these calculations and, on September 29, 2006, the ISO released new calculations and announced that it was seeking comments no later than October 27. Based on comments received during that review period, the ISO released an updated calculation of interest on unpaid invoices on February 27. The comment period closed on March 15.

Once all other outstanding financial adjustment activities (*i.e.* fuel cost and cost filing allocations) are completed, the ISO will calculate interest on refunds, which is the last interest calculation that the ISO will do as part of the financial adjustment phase. The ISO estimates that this will take 2 weeks, at which time the ISO will make this data available to parties. ISO will also need to perform adjustments to balances in the ISO market to account for any allocation that the ISO receives as a result of a shortfall in the PX markets between interest earned in the PX Settlement Trust Account and the Commission's rate.¹² However, the ISO plans to wait to make these adjustments until after it completes the financial adjustment phase and begins accounting for the impacts of the settlements entered into in this proceeding. The ISO proposes to proceed in this manner because even if it calculates these adjustments during the financial adjustment phase, they will almost certainly have to be re-done when it accounts for settlements in this proceeding.

¹² In its November 23, 2004 "Order on Rehearing" issued in this proceeding, the Commission accepted the ISO's request to allocate any portion of such shortfall assigned to the ISO pro rata to its participants. 109 FERC ¶ 61,218 at P 39 (2004).

One other interest issue that the ISO wishes to bring to the attention of parties involves interest on preparatory rerun adjustments relating to transactions with trading dates during the Refund Period. Previously, the ISO indicated that it did not intend to assess interest on any preparatory rerun adjustments, under the rationale that those adjustments had not yet been explicitly invoiced by the ISO.¹³ However, upon further consideration, the ISO is convinced that it should assess interest on preparatory rerun adjustments relating to transactions that were entered into during the Refund Period.

This ISO reached this conclusion for a number of reasons. First and foremost, the preparatory rerun adjustments were made over three years ago, and it still not certain as to when those adjustments will be invoiced to Market Participants. Therefore, those entities that owe money to the ISO Markets as the results of preparatory rerun adjustments have been able to realize the benefit of those amounts for a substantial period of time, while on the other side of the coin, parties that are owed money by the ISO market as a result of preparatory rerun adjustments have been unable to utilize those amounts during this period.

Although the ISO does not normally assess interest on internal reruns, the refund period involves two extraordinary circumstances: the prices were found to be unreasonably high and suppliers will be paying interest on the refunds. These circumstances present a unique opportunity to shortchange parties that are the beneficiaries of preparatory adjustments during that period. A seller, for example, will be paying significant interest on refunds for certain billable

¹³ "Motion for Leave to File Answer and Answer of the California Independent System Operator Corporation to Reliant's Protest to the Addendum to the ISO's July 11, 2005 Refund Status Report," filed September 1, 2005.

quantities for which it may never have been credited, due to the settlements issues being corrected through the prep reruns. At the same time, a buyer may have lost the use of funds for several years of certain billable quantities for which it may have been overcharged, again due to the settlements issues being corrected through the prep reruns, at the unreasonably high prices charged during that error. Both of these unjust circumstances go beyond the ordinary risks that parties assume through the settlements process.

Moreover, including interest on the preparatory rerun adjustments relating to the Refund Period is consistent with the Commission's requirements that interest be assessed on both unpaid amounts and refunds. In many respects, assessing interest on preparatory rerun adjustments for the Refund Period is similar to assessing interest on refund amounts: neither of these adjustments has yet technically been "invoiced" to parties, but they nevertheless reflect amounts owed by or owing to the ISO market. Also, the Commission's policy of requiring interest to be assessed on both refunds and unpaid amounts suggests that the Commission intended that interest be assessed based on each party's overall position with respect to Refund Period transactions. In order to implement this approach on a consistent and holistic basis, interest assessments should also take into account adjustments to Refund Period transactions made as part of the preparatory rerun process.

For these reasons, the ISO intends to assess interest on preparatory rerun adjustments relating to transactions that were entered into during the Refund Period. The ISO will determine the date on which interest begins to run by using

the trade date on which the original transaction took place. For example, if a particular preparatory rerun adjustment was made for a transaction that originally took place on March 12, 2001, then the ISO would begin to calculate interest as of that date. This corresponds to the ISO's methodology for calculating interest on refunds, and is consistent with the Commission's directive that interest should be computed from the "date of collection."¹⁴

The ISO expects to make calculations of this interest component available through a listserv announcement on March 19, 2006, with comments due April 9, 2006.

E. STATUS OF ADR CLAIMS

As noted in previous reports, a number of claims that relate to the Refund period are being pursued by various Market Participants in Alternative Dispute Resolution ("ADR") pursuant to Section 13 of the ISO Tariff. In previous monthly reports, the ISO noted that charges resulting from certain disputes may be assessed to the Scheduling Coordinators during the period affected by this case – both the refund rerun and the preparatory rerun. In the February 2007 status report, the ISO provided an update on the status of these matters, most of which are also posted on the ISO website at <http://www.caiso.com/clienterv/adr/>.

The ISO continues to suspend conference calls with Market Participants on the status of re-run activity until any issues surface that suggest the need for additional calls. The ISO will likely schedule another conference call after it distributes the data from the financial adjustment phase, in order to field

¹⁴ *San Diego Gas & Electric Co., et al*, 105 FERC ¶ 61,066 at P 107 (2003).

questions from Market Participants on that data. The ISO will inform Market Participants when it schedules that call.

F. DECEMBER 1 DISPUTES

On December 1, 2005, pursuant to the Commission's August 8, 2005 order on cost-based recovery issues,¹⁵ several entities filed with the Commission pleadings raising actual, or potential, disputes with respect to reruns and offsets. In the August 23 Order, the Commission acted on these disputes, rejecting the majority of them. With respect to the dispute filed by Puget Sound concerning ISO settlement data, the Commission required the ISO and Puget to attempt to resolve the issues raised by Puget, and to file periodic status reports concerning these efforts. The ISO and Puget filed three status reports, and ultimately, on October 16, 2006, their final positions on the single issue that could not be resolved.

III. ESTIMATED SCHEDULE FOR COMPLETION OF THE REFUND RE-RUN ACTIVITY

Attachment A to this status report contains the ISO's estimate of the time that will be required to complete the financial adjustment phase. As noted above, the preparatory re-run was completed July 16, 2004, the FERC refund re-run statement production phase was completed February 15, 2005, and the ISO is currently processing the financial adjustment phase offsets. The ISO has completed the first step of the two-step fuel cost allowance allocation process,

¹⁵ 112 FERC ¶ 61,176 (2005) at P 116.

and has distributed the results of these calculations to parties, as noted above. The ISO has processed emissions offsets, and has distributed to parties data on allocation percentages and offsets.

Based on the steps outlined above, the ISO estimates that on the present schedule, it will take approximately 7 more weeks to complete the financial adjustment phase calculations, including applicable review periods.

The ISO recognizes that this schedule could be extended if errors are discovered during the review periods for the calculations. It may also change as the result of any number of legal challenges to Commission orders, including the decisions by the Ninth Circuit Court of Appeals in *BPA v. FERC* concerning the refund liability of non-FERC jurisdictional entities, and *CPUC v. FERC* concerning certain “scope/transactions” issues. However, for reasons set forth in previous status reports, the ISO believes that given the status of these various challenges,¹⁶ there is no basis at this time for the ISO to depart from the schedule directed by the Commission for completing the refund process.

Attachment B to this status report contains a list of the major ISO refund calculation distributions and the associated review and comment periods provided to parties by the ISO to date. In some cases, the ISO did not provide any specific closing date for comments, but rather, continued to solicit and consider comments and make appropriate corrections until the data were utilized to make further calculations. For subsequent review periods, the CAISO emphasizes that the parties are expected to raise any objections that they may

¹⁶ The only decisions that have been rendered concerning the various issues in this proceeding are the *BPA v. FERC* and *CPUC v. FERC* decisions, and the Ninth Circuit has yet to issue the mandates for those decisions.

have to the CAISO's methodologies or calculations during these periods. After the expiration of review periods, the circulated numbers should be final, subject only to disputes actually raised with the CAISO, disputes that could not have been raised during the applicable review periods, and adjustments required by further rulings from FERC. That being said, the CAISO believes that it is important that parties have sufficient time to meaningfully review and comment on the CAISO's calculations. If any party believes that scheduled time is not enough to allow adequate review, please inform the CAISO contacts on that issue. These individuals are typically designated on the notice about the review period. The CAISO intends to emphasize in its compliance filing that every component of its data has been reviewed by the parties.

IV. CONCLUSION

The ISO respectfully requests that the Commission accept the ISO's thirty-third refund status report in compliance with the Commission's February 3 Order, referenced above.

Respectfully submitted,

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Dated: March 16, 2007

ATTACHMENT A

**CURRENT TIMELINE FOR COMPLETION OF
FINANCIAL ADJUSTMENT PHASE OF REFUND PROCEEDING
MARCH 2007**

DATE (ESTIMATED)	ITEMS
March 19, 2007	Calculations of interest on prep reruns during refund period to be made available through listserv announcement
March 23, 2007	ISO distributes to parties fuel cost allocation amounts for each Market Participant
March 29, 2007	ISO circulates to parties data on cost filing allocations
April 6, 2007	Comments due on fuel cost allocation amounts
April 9, 2007	Comments due on calculations of interest on prep reruns during refund period
April 18, 2007	Comments due on cost filing allocation data
2 Weeks After All Offsets are Finalized	ISO distributes to parties interest calculations on refunds

ATTACHMENT B

TABLE OF MAJOR REFUND CALCULATIONS DISTRIBUTED BY ISO AND ASSOCIATED REVIEW PERIODS


Item	Date Issued	Review Period/Comments Due Date
Preparatory Settlement Rerun Calculations	Published by the ISO on a rolling basis between December 15, 2003 to July 16, 2004	Disputes accepted on a rolling basis between February 17, 2004 to September 11, 2004
Refund Settlement Rerun Calculations	Published by the ISO on a rolling basis between October 25, 2005 to February 17, 2006	Several due dates for disputes, the first being March 2, 2005, the last being March 1, 2006
Preliminary Mitigated Market Clearing Prices	May 28, 2004	No explicit comment period specified
Final Mitigated Market Clearing Prices	July 8, 2004	No explicit comment period specified
List of Transactions Exempt from Mitigation	November 4, 2004	No explicit comment period specified
Fuel Cost Allocation Percentages	December 22, 2005	4 Weeks
Revised Fuel Cost Allocation Percentages	June 1, 2006	June 8, 2006
Second Revised Fuel Cost Allocation Percentages	February 12, 2007	February 26, 2007
Emissions Allocation Percentages	April 25, 2006	May 23, 2006
Final Approved Emissions Claim Amounts	September 21, 2006	No explicit comment period, as the ISO did not receive any objections to its previous emissions distribution
Reversal of Interest Charged During Refund Period	January 12, 2006	No explicit comment period specified
Interest on Unpaid Invoices	May 1, 2006	No explicit comment period specified

Revised Interest on Unpaid Invoices	September 29, 2006	October 27, 2006
Second Revised Interest on Unpaid Invoices	February 27, 2007	March 15, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list for the captioned proceeding, in accordance with Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, CA, on this 16th day of March, 2007.


Susan Montana
Susan Montana