

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Promote
Policy and Program Coordination and
Integration in Electricity Utility Resource
Planning

Rulemaking 04-04-003;
(Filed: April 1, 2004)

Order Instituting Rulemaking to Promote
Consistency in Methodology and Input
Assumptions in Commission Applications of
Short-run and Long-run Avoided Costs,
Including Pricing for Qualifying Facilities

Rulemaking 04-04-025
(Filed April 22, 2004)

**PRE-WORKSHOP STATEMENT OF ISSUES OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
IN RESPONSE TO OCTOBER 18, 2007 NOTICE**

Dated: October 22, 2007

Sidney M. Davies

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STATE OF CALIFORNIA**

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The California Independent System Operator Corporation (“CAISO”) submits the following brief statement of issues that the CAISO believes are relevant to the topics identified for the November 14-15 workshop.

**1. Scope of Order Requirement that QFs must comply with CAISO Tariff
(Section 7.4.3)**

The CAISO believes that the requirement should be interpreted as extending to any QF that takes advantage of the contract options made available to QFs pursuant to the Commission’s “Prospective QF Program” provided in D. 07-09-040, including all new QFs.

2. What it means to comply with the CAISO Tariff (Section 7.4.3)

The CAISO believes that QFs must enter in to QF-Participating Generator Agreements with the CAISO or standard Participating Generator Agreements at the QF's election. QFs must also enter into interconnection agreements with the CAISO, although no new interconnection studies will be required, except in the case of an upgrade or a new interconnection at transmission level voltage.

3. New QF Contracts must be consistent with CAISO Tariff

The CAISO believes that the new QF contract must reflect requirements set forth by the Commission in D.07-09-040.

4. Pricing post MRTU Implementation

The CAISO believes it can be of assistance to the parties at the work shop on discussion relating to pricing under the CAISO's new market.

Dated: October 22, 2007

Respectfully submitted,

CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION

By: // *Sidney M. Davies* //

Sidney M. Davies, Assistant General Counsel,
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CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2007. I served, by electronic and U.S. Mail, a copy of the Pre-Workshop Statement Of Issues Of The California Independent System Operator In Response To October 18, 2007 Notice on the parties listed on the service lists in proceedings R.04-04-003 and R. 04-04-025.

Executed on October 22, 2007 at Folsom,
California

/s/Susan L. Montana

Susan L. Montana

An employee of the California Independent
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