

**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)

**AMENDMENT TO
MOTION FOR LEAVE TO RESPOND
AND RESPONSE
OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION TO THE
ANSWER OF POWEREX CORP.**

On Thursday, April 7, 2005, The California Independent System Operator Corporation ("ISO")¹ submitted its Motion For Leave to Respond and Response To the Answer of Powerex Corporation, in the above captioned proceeding. The ISO now seeks to offer an Amendment to that earlier pleading related to the

¹ Capitalized terms not otherwise defined herein shall have the meanings set forth in the Master Definitions Supplement, Appendix A, to the ISO Tariff.

burden estimate of implementing the proposed mitigation methodology of Powerex.

I. AMENDMENT

At the bottom of page 6 of the ISO's response the ISO stated, " If the Commission were to require the ISO to adopt Powerex's methodology, despite the fact that it already denied Powerex's request to do so over a year and a half ago, the ISO would be required to do another complete rerun of its settlement system, a process that would require a number of weeks, rather than the several days suggested by Powerex"². After further consideration and analysis by its Settlements staff, the ISO would now revise its assessment of the amount of time and effort that it may take to implement the Powerex proposal. Specifically, the ISO believes that the effort required to place the Powerex methodology in operation for rerun purposes would be similar to the work effort to upload manual corrections for the hourly mitigation calculations during the recently completed refund rerun. This operation would involve recalculation of the prices as proposed by Powerex, reversing the manual charges applied during the refund rerun to accommodate hourly mitigation, re-applying the charges based on the methodology proposed by Powerex, reissuing Compact Discs ("CDs") to parties for verification purposes, and possibly dealing with another round of billing inquiries from other parties caused by the application of the revised pricing methodology requested by Powerex. The ISO's best estimate, after reviewing this process in some detail again, is that at least three-four weeks of additional work would be required. This estimate is less than previously suggested, but still

² Response to Powerex at 6.

an additional burden on the process that is clearly unnecessary and improper given the Commission's earlier decisions on this matter. However, in an effort to clarify the record and not mislead the Commission, the ISO offers this revised estimate of the burden involved in implementing the revised methodology.

Respectfully submitted,

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April 11, 2005

/s/ Gene L. Waas

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April 11, 2005

BY ELECTRONIC TRANSMISSION

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 No. ER03-746-000

***San Diego Gas & Electric Company v. Sellers of Energy and
Ancillary Services into Markets Operated by the California
Independent System Operator Corporation and California
Power Exchange***
Docket No. EL00-95, et al.

***Investigation of Practices of the California Independent
System Operator and California Power Exchange***
Docket No. EL00-98, et al.

Dear Secretary Salas:

Enclosed for electronic filing please find an Amendment for Motion for Leave to Respond and Response of the California Independent System Operator Corporation to the Answer of Powerex Corp in the above-referenced dockets.

Thank you for your assistance in this matter.

Very truly yours,

/s/ Gene L. Waas
Gene L. Waas

Counsel for the California Independent
System Operator Corporation

Enclosures

cc: All parties of record

CERTIFICATE OF SERVICE

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

Dated at Folsom, CA, this 11th day of April, 2005.

/s/ Gene L. Waas
Gene L. Waas