California Independent
System Operator Corporation

September 15, 2010

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: California Independent System Operator Corporation
Docket Nos. ER08-1178-___,
and EL08-88-___
July 2010 Exceptional Dispatch Report (Chart 1 data)

Dear Secretary Bose:

Pursuant to the Commission's September 2, 2009 and May 4, 2010 orders in the above referenced docket, the California Independent System Operator Corporation submits the attached report. The attached report provides details concerning Exceptional Dispatches the Commission directed to be included in "Chart 1" as set forth in Appendix A of the September 2 order, as modified by the ISO's September 14 motion for clarification, which the Commission granted in its May 4 order. The attached report provides Chart 1 data for the month of July 2010.

Respectfully submitted,

/s/ Sidney M. Davies

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Exceptional Dispatch Report

Table 1: July 2010

ISO Market Services September 15, 2010

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Introduction

This report is filed pursuant to FERC's September 2, 2009 and May 4, 2010 orders in ER08-1178. These orders require two monthly Exceptional Dispatch reports—one issued on the 15th of each month and one issued on the 30th of each month. This report provides data on the frequency and reasons for Exceptional Dispatches issued in July 2010.

The Nature of Exceptional Dispatch

The ISO can issue exceptional dispatch instructions for a resource as a pre-day-ahead unit commitment, a post-day-ahead unit commitment, or a real-time exceptional dispatch[1]. A pre-day-ahead commitment is an exceptional dispatch instruction that commits a resource at or above its physical minimum operating level in the day-ahead market. A post-day-ahead market commitment is an exceptional dispatch instruction that commits a resource at or above its physical minimum operating level in the real-time market. A real-time exceptional dispatch instruction is a dispatch of a resource at or above its physical minimum operating point. For the purposes of this report, a real-time exceptional dispatch above the resource day-ahead award is considered an incremental exceptional dispatch instruction and an exceptional dispatch below the day-ahead award is considered a decremental dispatch instruction.

The ISO issues exceptional dispatch instructions primarily for constraints which are not enforced or not completely enforced in the market software. Whenever the ISO issues an exceptional dispatch instruction, such instructions are logged into the scheduling and logging system ("SLIC"), including the associated reason. These reasons are associated with the constraints that are not currently incorporated into the market application. In addition to model constraints, the ISO also issues exceptional dispatch instructions for software failures.

Many of the exceptional dispatches listed below in Table 1, were to satisfy either a local area or system reliability requirements, and are classified into local generation requirements, transmission management requirements, non-modeled transmission outages or other requirements, such as ramp requirements and intertie emergency assistance. All reason codes starting with "G" refer to an ISO operation procedure for generation requirements and reason codes starting with "T" refer to an ISO operating procedure for transmission facilities. Most of the generation procedures are internal to the ISO and not available on the ISO website. All of the transmission procedures are available on the CAISO website[2].

[1] The ISO can issue exceptional dispatch instruction subject to authority of the ISO Tariff Section 34.9 and in accordance with ISO Operating Procedure M-402.

[2] A list of all of the ISO's publicly available Operating Procedures are available at the following link: **http://www.caiso.com/thegrid/operations/opsdoc/index.html**

In July 2010, the ISO issued exceptional dispatches for the following local area generation requirement: (1) G-219, SCE area generation requirements. Exceptional dispatch instructions were also issued for the following transmission management requirements: (1) T-103, Southern California import transmission (SCIT) nomogram; (2) T-129, transmission facilities in Fresno area; (3) T-132, transmission facilities in San Diego and Imperial Valley area; (4) T-138, transmission facilities in Humboldt area; (5) T-161, WECC Open Loop Operation; (6) T-165, transmission facilities in Palermo Rio-Oso area; (7) T-168, Path 26 Midway-Vincent RAS; (8) T-169, Julian Hinds-Mirage 230 kV Line Overload Mitigation & Eagle Mountain Bank Emergency Mitigation; (9) T-170, Mirage-Tamarisk and Mirage-Concho 115 kV lines; and (10) other transmission outages in PG&E, SCE and SDG&E area.

The following additional reasons for exceptional dispatch instructions in July 2010 were not related to specific generation or transmission operating procedures: (1) Software Limitation, when an exceptional dispatch instruction was used to bridge schedules across days for resources with a minimum down time of 24 hours, as the ISO software does not handle multi day commitment. (For instance, a resource has a day-ahead schedule from 0600 till 2300, and then is shut down in 2400. If this resource had a minimum down time of 24 hours and it is required the following day, then the ISO issues an exceptional dispatch to commit this resource in 2400 so that it can be dispatched economically in the following day. Software limitation reason was also used for exceptional dispatches to manually issue shut down instructions to a resource because of a temporary Automatic Dispatch System ("ADS") failure, or similar issues.); (2) Market Disruption, when the exceptional dispatch instructions were issued due to HASP failures; and (3) Ramp Rate, when exceptional dispatch instructions were issued to dispatch a resource above its physical minimum to a level where the resource has significantly higher ramp rate capability. For example, a resource could have a ramp rate of 2 MW/min at its physical minimum of 100 MW, but a significantly higher ramp rate of 10 MW/min at 250 MW. The operators could issue an exceptional dispatch for this resource to be dispatched to 250 MW, so that the resource could respond to the anticipated steep load ramp or to a potential contingency. There were a few other reasons used to explain exceptional dispatch instructions in July, which are self explanatory.

As mentioned earlier, the data shown in Table 1 is based on a template specified in the September 2009 order[3]. Each entry in Attachment A is a summary of exceptional dispatches classified by (1) the reason for the exceptional dispatch; (2) the location of the resource by Participating Transmission Owner ("PTO")

[3] The data in Table 1 is principally SLIC information supplemented with data from the Market Quality System (MQS). It is the most accurate currently available and it is worth noting that this data has been through the T+38B initial statement process wherein many unresolved issues are fixed. The CAISO believes that this data will correlate well with the settlements data that will be available when the CAISO files the Table 2 report for the reporting period.

service area; (3) the Local Reliability Area (“LRA”) where applicable; (4) the market in which the exceptional dispatch occurred (day-ahead vs. real-time); and (5) the date of the exceptional dispatch. For each classification the following information is provided: (1) Megawatts (MW); (2) Commitment (3) Inc or Dec (4) Hours; (5) Begin Time; and (6) End Time.

The MW column shows the range of exceptional dispatch instructions in MW for the classification. The commitment column specifies if there was a unit commitment for the classification. The INC/DEC/NA column specifies if there was an incremental dispatch, a decremental dispatch, or only a unit commitment. If the exceptional dispatch was only a unit commitment, the column shows NA for the classification. The Begin Time column shows the start of exceptional dispatch for the classification and the End Time column shows the end of exceptional dispatch for the classification. The column hours is the difference between end time and begin time rounded up to the next hour. The data shown is further explained by way of example in Attachment A.

Table 1 indicates that there were a total of 276 exceptional dispatches in July 2010, increasing by 57 compared with 219 such instances reported in the August 16, 2010 report. Real-time exceptional dispatches in July accounted for approximately 99.7 percent of all exceptional dispatches categorized by date and reason. Exceptional dispatches issued for the following reasons accounted for approximately 52 percent of the total exceptional dispatches during the reporting period: Software Limitation, Ramp Rate, T-132, and T-129. In day-ahead market, there was one exceptional dispatch issued for Software Limitation. In real-time market, approximately 52 percent of the exceptional dispatches were issued for Software Limitation, Ramp Rate, T-132, and T-129.

Table 1: Exceptional Dispatches in July 2010

California Independent System Operator Corporation
Exceptional Dispatch Report
September 15, 2010

Chart 1: Table of Exceptional Dispatches for Period 01/July/2010 – 31/July/2010

Number	Market Type	Reason	Location	Local Reliability Area	Trade Date	MW	Commitment	INC_DEC	Hours	Begin Time	End Time
1	DA	Software Limitation	PG&E	N/A	12-Jul-10	52	Yes	N/A	20	4:00	23:00
2	RT	Dispatchability	SCE	Big Creek-Ventura	30-Jul-10	100	Yes	INC	8	16:53	23:59
3	RT	Dispatchability	SDG&E	San Diego	16-Jul-10	170- 341	Yes	DEC	10	9:50	18:59
4	RT	Dispatchability	SDG&E	San Diego	16-Jul-10	2- 91	Yes	INC	11	8:35	18:59
5	RT	Fire	PG&E	Bay Area	29-Jul-10	225	No	DEC	1	19:27	19:39
6	RT	Fire	PG&E	Fresno	29-Jul-10	88- 158	No	DEC	1	19:09	19:34
7	RT	Fire	PG&E	Fresno	29-Jul-10	467- 717	Yes	INC	2	18:50	19:34
8	RT	Fire	PG&E	N/A	29-Jul-10	80	Yes	DEC	1	19:15	19:39
9	RT	Fire	SCE	Big Creek-Ventura	29-Jul-10	26	Yes	DEC	1	18:40	18:59
10	RT	Fire	SCE	Big Creek-Ventura	29-Jul-10	184	Yes	INC	2	18:49	19:39
11	RT	Fire	SCE	Big Creek-Ventura	30-Jul-10	76- 460	No	DEC	20	4:42	23:59
12	RT	Fire	SCE	Big Creek-Ventura	30-Jul-10	54	No	INC	8	4:42	11:34
13	RT	Fire	SCE	Big Creek-Ventura	31-Jul-10	140	No	INC	16	0:00	15:29
14	RT	Fire	SCE	LA Basin	29-Jul-10	322	Yes	INC	2	18:49	19:39
15	RT	Fire	SDG&E	San Diego	29-Jul-10	89	Yes	INC	2	18:49	19:39
16	RT	G-219	SCE	LA Basin	5-Jul-10	20	Yes	INC	16	8:00	23:59

Number	Market Type	Reason	Location	Local Reliability Area	Trade Date	MW	Commitment	INC_DEC	Hours	Begin Time	End Time
17	RT	G-219	SCE	LA Basin	24-Jul-10	20	Yes	INC	24	0:00	23:59
18	RT	Generation Outage	PG&E	Fresno	14-Jul-10	83- 531	Yes	INC	2	14:42	15:59
19	RT	Generation Outage	PG&E	N/A	14-Jul-10	357	Yes	DEC	1	15:00	15:14
20	RT	Intertie Emergency Assistance	N/A	N/A	19-Jul-10	30- 70	No	INC	2	11:35	12:59
21	RT	Intertie Emergency Assistance	N/A	N/A	23-Jul-10	70- 100	No	INC	2	16:00	17:59
22	RT	Intertie Emergency Assistance	N/A	N/A	24-Jul-10	140- 160	No	INC	2	2:47	3:59
23	RT	Intertie Emergency Assistance	N/A	N/A	29-Jul-10	120	No	INC	1	9:20	9:59
24	RT	Market Disruption	N/A	N/A	5-Jul-10	992	Yes	DEC	1	2:00	2:59
25	RT	Market Disruption	N/A	N/A	5-Jul-10	204	Yes	INC	1	2:00	2:59
26	RT	Market Disruption	N/A	N/A	6-Jul-10	107	No	DEC	1	3:00	3:59
27	RT	Market Disruption	N/A	N/A	6-Jul-10	218	Yes	INC	1	3:00	3:59
28	RT	Market Disruption	N/A	N/A	19-Jul-10	200	Yes	INC	1	12:00	12:59
29	RT	Market Disruption	N/A	N/A	20-Jul-10	147	No	DEC	1	23:00	23:59
30	RT	Market Disruption	N/A	N/A	20-Jul-10	450	Yes	INC	1	23:00	23:59
31	RT	Market Disruption	N/A	N/A	27-Jul-10	780	Yes	DEC	1	23:00	23:59
32	RT	Market Disruption	N/A	N/A	27-Jul-10	200	Yes	INC	1	23:00	23:59
33	RT	Market Disruption	N/A	N/A	29-Jul-10	10- 250	No	DEC	3	20:00	22:59
34	RT	Market Disruption	N/A	N/A	29-Jul-10	400- 750	Yes	INC	2	20:00	21:59
35	RT	Market Disruption	N/A	N/A	30-Jul-10	106	No	DEC	1	6:00	6:59
36	RT	Market Disruption	N/A	N/A	30-Jul-10	625	Yes	INC	1	6:00	6:59
37	RT	Over Generation	PG&E	Fresno	20-Jul-10	0	No	INC	2	1:55	2:14
38	RT	Path 66 Overload	N/A	N/A	15-Jul-10	75	No	DEC	1	15:00	15:59
39	RT	Path 66 Overload	N/A	N/A	15-Jul-10	0	No	INC	4	16:00	19:59
40	RT	Pump Management	PG&E	Fresno	18-Jul-10	308	Yes	INC	2	3:40	4:49
41	RT	Ramp Rate	PG&E	N/A	17-Jul-10	231- 494	No	DEC	12	8:50	19:59
42	RT	Ramp Rate	PG&E	N/A	17-Jul-10	54	No	INC	12	8:50	19:59
43	RT	Ramp Rate	SCE	Big Creek-Ventura	16-Jul-10	243- 371	No	DEC	11	11:35	21:59
44	RT	Ramp Rate	SCE	Big Creek-	16-Jul-10	270	No	INC	12	10:25	21:59

Number	Market Type	Reason	Location	Local Reliability Area	Trade Date	MW	Commitment	INC_DEC	Hours	Begin Time	End Time
				Ventura							
45	RT	Ramp Rate	SCE	Big Creek-Ventura	17-Jul-10	100- 200	Yes	INC	19	3:00	21:59
46	RT	Ramp Rate	SCE	Big Creek-Ventura	18-Jul-10	29- 146	Yes	DEC	9	11:05	19:09
47	RT	Ramp Rate	SCE	Big Creek-Ventura	18-Jul-10	250	Yes	INC	7	15:55	21:59
48	RT	Ramp Rate	SCE	Big Creek-Ventura	19-Jul-10	250- 400	Yes	INC	8	12:20	19:59
49	RT	Ramp Rate	SCE	Big Creek-Ventura	20-Jul-10	250- 400	Yes	INC	12	10:10	21:59
50	RT	Ramp Rate	SCE	LA Basin	1-Jul-10	120- 130	No	DEC	11	11:00	21:59
51	RT	Ramp Rate	SCE	LA Basin	1-Jul-10	66- 179	Yes	INC	11	11:00	21:59
52	RT	Ramp Rate	SCE	LA Basin	16-Jul-10	32- 962	No	DEC	14	8:40	21:59
53	RT	Ramp Rate	SCE	LA Basin	16-Jul-10	263	No	INC	14	8:40	21:59
54	RT	Ramp Rate	SCE	LA Basin	17-Jul-10	77- 420	Yes	DEC	9	11:05	19:59
55	RT	Ramp Rate	SCE	LA Basin	17-Jul-10	150	Yes	INC	9	11:05	19:59
56	RT	Ramp Rate	SCE	LA Basin	18-Jul-10	179- 249	Yes	DEC	6	13:15	18:59
57	RT	Ramp Rate	SCE	LA Basin	18-Jul-10	70	Yes	INC	10	10:55	19:59
58	RT	Ramp Rate	SCE	LA Basin	19-Jul-10	43- 179	Yes	DEC	7	13:00	19:59
59	RT	Ramp Rate	SCE	LA Basin	20-Jul-10	78- 369	Yes	DEC	9	13:00	21:59
60	RT	Ramp Rate	SCE	LA Basin	20-Jul-10	71- 142	Yes	INC	11	11:30	21:59
61	RT	Ramp Rate	SCE	LA Basin	21-Jul-10	19- 330	No	DEC	13	9:55	21:59
62	RT	Ramp Rate	SCE	LA Basin	21-Jul-10	142- 250	Yes	INC	13	9:50	21:59
63	RT	Ramp Rate	SCE	LA Basin	23-Jul-10	142	Yes	INC	13	6:10	18:59
64	RT	Ramp Rate	SCE	LA Basin	29-Jul-10	45	No	INC	2	22:55	23:59
65	RT	Ramp Rate	SCE	LA Basin	30-Jul-10	45	No	INC	2	0:00	1:49
66	RT	Ramp Rate	SCE	N/A	16-Jul-10	40- 100	Yes	INC	14	8:00	21:59
67	RT	Ramp Rate	SDG&E	San Diego	17-Jul-10	20- 328	No	DEC	20	0:00	19:59
68	RT	Ramp Rate	SDG&E	San Diego	17-Jul-10	32- 187	No	INC	11	11:05	21:59

Number	Market Type	Reason	Location	Local Reliability Area	Trade Date	MW	Commitment	INC_DEC	Hours	Begin Time	End Time
69	RT	Ramp Rate	SDG&E	San Diego	18-Jul-10	10- 196	Yes	DEC	11	11:05	21:59
70	RT	Ramp Rate	SDG&E	San Diego	18-Jul-10	140- 150	Yes	INC	11	11:05	21:59
71	RT	Ramp Rate	SDG&E	San Diego	20-Jul-10	172- 331	Yes	DEC	9	12:45	20:59
72	RT	Ramp Rate	SDG&E	San Diego	20-Jul-10	63	Yes	INC	8	12:45	19:14
73	RT	Ramp Rate	SDG&E	San Diego	21-Jul-10	68	Yes	INC	12	10:05	21:59
74	RT	SP26 Capacity	SCE	Big Creek-Ventura	17-Jul-10	50	Yes	INC	2	22:00	23:59
75	RT	SP26 Capacity	SCE	Big Creek-Ventura	18-Jul-10	50	Yes	INC	24	0:00	23:59
76	RT	SP26 Capacity	SCE	Big Creek-Ventura	20-Jul-10	50	Yes	INC	24	0:00	23:59
77	RT	SP26 Capacity	SCE	LA Basin	1-Jul-10	20	Yes	INC	24	0:00	23:59
78	RT	SP26 Capacity	SCE	LA Basin	13-Jul-10	40	Yes	INC	24	0:00	23:59
79	RT	SP26 Capacity	SCE	LA Basin	14-Jul-10	10	Yes	INC	24	0:00	23:59
80	RT	SP26 Capacity	SCE	LA Basin	15-Jul-10	10- 110	Yes	INC	19	5:00	23:59
81	RT	SP26 Capacity	SCE	LA Basin	20-Jul-10	25- 50	Yes	INC	24	0:00	23:59
82	RT	SP26 Capacity	SCE	LA Basin	21-Jul-10	50	Yes	INC	24	0:00	23:59
83	RT	SP26 Capacity	SCE	LA Basin	22-Jul-10	50	Yes	INC	24	0:00	23:59
84	RT	SP26 Capacity	SCE	LA Basin	23-Jul-10	20- 70	Yes	INC	24	0:00	23:59
85	RT	SP26 Capacity	SCE	LA Basin	31-Jul-10	20	Yes	INC	2	22:00	23:59
86	RT	SP26 Capacity	SDG&E	San Diego	21-Jul-10	20	Yes	INC	23	1:00	23:59
87	RT	SP26 Capacity	SDG&E	San Diego	22-Jul-10	20	Yes	INC	24	0:00	23:59
88	RT	SP26 Mitigation	SDG&E	San Diego	15-Jul-10	14- 221	Yes	INC	6	14:00	19:22
89	RT	Software Limitation	N/A	N/A	22-Jul-10	58	No	DEC	1	9:00	9:59
90	RT	Software Limitation	N/A	N/A	30-Jul-10	0	Yes	INC	1	0:20	0:54
91	RT	Software Limitation	PG&E	Fresno	1-Jul-10	0	No	INC	24	0:00	23:59
92	RT	Software Limitation	PG&E	Fresno	2-Jul-10	0	No	INC	24	0:00	23:59
93	RT	Software Limitation	PG&E	Fresno	3-Jul-10	0	No	INC	24	0:00	23:59
94	RT	Software Limitation	PG&E	Fresno	4-Jul-10	0	No	INC	24	0:00	23:59

Number	Market Type	Reason	Location	Local Reliability Area	Trade Date	MW	Commitment	INC_DEC	Hours	Begin Time	End Time
95	RT	Software Limitation	PG&E	Fresno	5-Jul-10	0	Yes	INC	23	1:40	23:59
96	RT	Software Limitation	PG&E	Fresno	6-Jul-10	0	No	INC	24	0:00	23:59
97	RT	Software Limitation	PG&E	Fresno	7-Jul-10	0	No	INC	24	0:00	23:59
98	RT	Software Limitation	PG&E	Fresno	8-Jul-10	0	No	INC	24	0:00	23:59
99	RT	Software Limitation	PG&E	Fresno	9-Jul-10	0	No	INC	24	0:00	23:59
100	RT	Software Limitation	PG&E	Fresno	10-Jul-10	0	No	INC	24	0:00	23:59
101	RT	Software Limitation	PG&E	Fresno	11-Jul-10	0	No	INC	24	0:00	23:59
102	RT	Software Limitation	PG&E	Fresno	12-Jul-10	0	No	INC	24	0:00	23:59
103	RT	Software Limitation	PG&E	Fresno	13-Jul-10	0	No	INC	24	0:00	23:59
104	RT	Software Limitation	PG&E	Fresno	14-Jul-10	95	Yes	DEC	15	0:00	14:24
105	RT	Software Limitation	PG&E	Fresno	14-Jul-10	22	Yes	INC	16	0:00	15:59
106	RT	Software Limitation	PG&E	Fresno	15-Jul-10	95	Yes	DEC	14	0:00	13:14
107	RT	Software Limitation	PG&E	Fresno	15-Jul-10	0	Yes	INC	14	0:00	13:14
108	RT	Software Limitation	PG&E	Fresno	16-Jul-10	94- 95	No	DEC	24	0:00	23:59
109	RT	Software Limitation	PG&E	Fresno	16-Jul-10	0	No	INC	24	0:00	23:59
110	RT	Software Limitation	PG&E	Fresno	17-Jul-10	0	Yes	INC	24	0:00	23:59
111	RT	Software Limitation	PG&E	Fresno	18-Jul-10	0	Yes	INC	24	0:00	23:59
112	RT	Software Limitation	PG&E	Fresno	19-Jul-10	0	Yes	INC	13	0:00	12:59
113	RT	Software Limitation	PG&E	Fresno	20-Jul-10	0	Yes	INC	10	1:05	10:59
114	RT	Software Limitation	PG&E	Fresno	21-Jul-10	0	No	INC	24	0:00	23:59
115	RT	Software Limitation	PG&E	Fresno	22-Jul-10	0	Yes	INC	24	0:00	23:59
116	RT	Software Limitation	PG&E	Fresno	23-Jul-10	0	No	INC	24	0:00	23:59
117	RT	Software Limitation	PG&E	Fresno	24-Jul-10	0	No	INC	24	0:00	23:59
118	RT	Software Limitation	PG&E	Fresno	25-Jul-10	0	No	INC	24	0:00	23:59
119	RT	Software Limitation	PG&E	Fresno	26-Jul-10	0	No	INC	24	0:00	23:59
120	RT	Software Limitation	PG&E	Fresno	27-Jul-10	0	Yes	INC	24	0:05	23:59
121	RT	Software Limitation	PG&E	Fresno	28-Jul-10	0	No	INC	24	0:00	23:59
122	RT	Software Limitation	PG&E	Fresno	29-Jul-10	308	Yes	DEC	2	3:45	4:49
123	RT	Software Limitation	PG&E	Fresno	29-Jul-10	0	No	INC	24	0:00	23:59

Number	Market Type	Reason	Location	Local Reliability Area	Trade Date	MW	Commitment	INC_DEC	Hours	Begin Time	End Time
124	RT	Software Limitation	PG&E	Fresno	30-Jul-10	0	Yes	INC	24	0:25	23:14
125	RT	Software Limitation	PG&E	Fresno	31-Jul-10	0	No	INC	24	0:00	23:59
126	RT	Software Limitation	PG&E	N/A	19-Jul-10	52	No	INC	3	21:00	23:59
127	RT	Software Limitation	PG&E	Stockton	18-Jul-10	38	Yes	DEC	3	15:00	17:59
128	RT	Software Limitation	PG&E	Stockton	18-Jul-10	0	Yes	INC	3	15:00	17:59
129	RT	Software Limitation	SCE	Big Creek-Ventura	30-Jul-10	0	Yes	INC	2	1:45	2:14
130	RT	Software Limitation	SCE	LA Basin	5-Jul-10	91- 104	No	DEC	16	8:00	23:59
131	RT	Software Limitation	SCE	LA Basin	13-Jul-10	0	Yes	INC	1	23:05	23:59
132	RT	Software Limitation	SCE	LA Basin	14-Jul-10	0	Yes	INC	24	0:00	23:49
133	RT	Software Limitation	SCE	LA Basin	15-Jul-10	190	Yes	INC	9	14:25	22:59
134	RT	Software Limitation	SCE	LA Basin	16-Jul-10	30	Yes	DEC	3	18:55	20:44
135	RT	Software Limitation	SCE	LA Basin	16-Jul-10	0	Yes	INC	3	18:55	20:44
136	RT	Software Limitation	SCE	LA Basin	17-Jul-10	0	Yes	INC	16	0:00	15:59
137	RT	Software Limitation	SCE	LA Basin	19-Jul-10	25	Yes	INC	5	19:25	23:59
138	RT	Software Limitation	SCE	LA Basin	22-Jul-10	20	Yes	INC	3	21:00	23:59
139	RT	Software Limitation	SCE	LA Basin	23-Jul-10	0	Yes	INC	2	21:45	22:59
140	RT	Software Limitation	SCE	LA Basin	24-Jul-10	0	Yes	INC	2	19:20	20:24
141	RT	Software Limitation	SCE	LA Basin	27-Jul-10	0	No	INC	5	0:10	4:09
142	RT	Software Limitation	SCE	LA Basin	30-Jul-10	0	Yes	INC	2	1:45	2:44
143	RT	Software Limitation	SCE	N/A	27-Jul-10	336- 500	Yes	INC	3	20:00	22:29
144	RT	Software Limitation	SDG&E	San Diego	9-Jul-10	35	Yes	DEC	1	19:05	19:09
145	RT	Software Limitation	SDG&E	San Diego	9-Jul-10	0	Yes	INC	1	19:10	19:59
146	RT	Software Limitation	SDG&E	San Diego	14-Jul-10	0	Yes	INC	1	20:20	20:59
147	RT	Software Limitation	SDG&E	San Diego	15-Jul-10	0	Yes	INC	2	18:20	19:19
148	RT	Software Limitation	SDG&E	San Diego	30-Jul-10	0	Yes	INC	12	0:05	11:44
149	RT	System Energy	PG&E	Bay Area	15-Jul-10	45- 90	Yes	INC	17	7:00	23:59
150	RT	System Energy	SCE	Big Creek-Ventura	16-Jul-10	691	No	DEC	1	13:00	13:04

Number	Market Type	Reason	Location	Local Reliability Area	Trade Date	MW	Commitment	INC_DEC	Hours	Begin Time	End Time
151	RT	System Energy	SCE	Big Creek-Ventura	17-Jul-10	50	Yes	INC	4	13:00	16:24
152	RT	System Energy	SCE	Big Creek-Ventura	19-Jul-10	50	Yes	INC	24	0:00	23:59
153	RT	System Energy	SCE	LA Basin	1-Jul-10	25	Yes	INC	15	9:00	23:59
154	RT	System Energy	SCE	LA Basin	12-Jul-10	30	Yes	INC	17	7:00	23:59
155	RT	System Energy	SCE	LA Basin	26-Jul-10	20	Yes	INC	15	9:00	23:59
156	RT	System Energy	SCE	N/A	16-Jul-10	40- 100	Yes	INC	11	11:00	21:59
157	RT	T-103	SCE	LA Basin	18-Jul-10	20	Yes	INC	24	0:00	23:59
158	RT	T-129	PG&E	Fresno	3-Jul-10	3- 5	No	DEC	11	6:22	16:39
159	RT	T-129	PG&E	Fresno	4-Jul-10	5- 10	No	DEC	9	6:20	14:59
160	RT	T-129	PG&E	Fresno	5-Jul-10	6	No	DEC	11	6:15	16:34
161	RT	T-129	PG&E	Fresno	5-Jul-10	0	No	INC	6	16:35	21:59
162	RT	T-129	PG&E	Fresno	6-Jul-10	3- 6	No	DEC	7	6:30	12:24
163	RT	T-129	PG&E	Fresno	6-Jul-10	0	No	INC	12	12:25	23:59
164	RT	T-129	PG&E	Fresno	7-Jul-10	61	No	INC	12	10:50	21:59
165	RT	T-129	PG&E	Fresno	9-Jul-10	20	No	DEC	1	23:30	23:59
166	RT	T-129	PG&E	Fresno	11-Jul-10	6- 78	No	DEC	1	23:00	23:59
167	RT	T-129	PG&E	Fresno	12-Jul-10	5	No	DEC	1	23:20	23:59
168	RT	T-129	PG&E	Fresno	12-Jul-10	59	No	INC	1	0:00	0:59
169	RT	T-129	PG&E	Fresno	15-Jul-10	5- 15	No	DEC	15	7:35	21:59
170	RT	T-129	PG&E	Fresno	16-Jul-10	10- 20	No	DEC	8	9:25	16:44
171	RT	T-129	PG&E	Fresno	16-Jul-10	0	No	INC	1	6:35	6:59
172	RT	T-129	PG&E	Fresno	17-Jul-10	308	No	INC	6	4:25	9:59
173	RT	T-129	PG&E	Fresno	21-Jul-10	0	Yes	INC	2	0:00	1:59
174	RT	T-129	PG&E	Fresno	26-Jul-10	5	No	DEC	1	23:37	23:54
175	RT	T-129	PG&E	Fresno	27-Jul-10	10	No	DEC	1	23:20	23:59
176	RT	T-129	PG&E	Fresno	28-Jul-10	5	No	DEC	2	22:55	23:59
177	RT	T-129	PG&E	Fresno	30-Jul-10	1- 6	No	DEC	15	7:10	21:59

Number	Market Type	Reason	Location	Local Reliability Area	Trade Date	MW	Commitment	INC_DEC	Hours	Begin Time	End Time
178	RT	T-132	SCE	LA Basin	10-Jul-10	2- 40	No	DEC	6	14:35	19:19
179	RT	T-132	SCE	LA Basin	10-Jul-10	29	No	INC	6	14:35	19:19
180	RT	T-132	SCE	LA Basin	19-Jul-10	50	Yes	DEC	2	14:25	15:24
181	RT	T-132	SCE	LA Basin	19-Jul-10	70- 207	Yes	INC	6	15:25	20:49
182	RT	T-132	SCE	LA Basin	20-Jul-10	140	Yes	INC	3	17:20	19:59
183	RT	T-132	SCE	LA Basin	26-Jul-10	71	Yes	INC	2	18:15	19:04
184	RT	T-132	SCE	LA Basin	27-Jul-10	25	Yes	INC	20	0:00	19:59
185	RT	T-132	SDG&E	N/A	10-Jul-10	42- 121	Yes	DEC	6	14:35	19:54
186	RT	T-132	SDG&E	N/A	14-Jul-10	100- 205	Yes	DEC	7	14:35	20:59
187	RT	T-132	SDG&E	N/A	15-Jul-10	88- 163	No	DEC	6	15:10	20:59
188	RT	T-132	SDG&E	N/A	16-Jul-10	60- 260	Yes	DEC	8	14:25	21:59
189	RT	T-132	SDG&E	N/A	17-Jul-10	100- 494	Yes	DEC	11	12:10	22:39
190	RT	T-132	SDG&E	N/A	18-Jul-10	13- 266	No	DEC	11	10:45	20:39
191	RT	T-132	SDG&E	N/A	18-Jul-10	0	No	INC	11	10:45	20:39
192	RT	T-132	SDG&E	N/A	19-Jul-10	40- 210	No	DEC	8	14:25	21:09
193	RT	T-132	SDG&E	N/A	20-Jul-10	60- 200	No	DEC	5	15:05	19:59
194	RT	T-132	SDG&E	N/A	24-Jul-10	40- 212	Yes	DEC	8	13:24	20:04
195	RT	T-132	SDG&E	N/A	24-Jul-10	10	Yes	INC	8	13:24	20:09
196	RT	T-132	SDG&E	N/A	25-Jul-10	90- 321	Yes	DEC	8	13:15	20:29
197	RT	T-132	SDG&E	N/A	25-Jul-10	4	Yes	INC	1	14:00	14:24
198	RT	T-132	SDG&E	N/A	26-Jul-10	40- 254	Yes	DEC	10	11:50	20:19
199	RT	T-132	SDG&E	N/A	26-Jul-10	0	No	INC	4	11:55	14:44
200	RT	T-132	SDG&E	N/A	29-Jul-10	90- 180	No	DEC	9	13:20	21:59
201	RT	T-132	SDG&E	N/A	30-Jul-10	28- 343	Yes	DEC	12	10:30	21:59
202	RT	T-132	SDG&E	N/A	30-Jul-10	25- 40	Yes	INC	3	10:20	12:39
203	RT	T-132	SDG&E	N/A	31-Jul-10	140- 310	No	DEC	7	12:05	18:29
204	RT	T-132	SDG&E	San Diego	17-Jul-10	87- 233	No	DEC	7	14:35	20:09
205	RT	T-132	SDG&E	San Diego	18-Jul-10	22- 146	No	DEC	10	10:50	19:39
206	RT	T-132	SDG&E	San Diego	18-Jul-10	34- 401	Yes	INC	10	10:50	19:59

Number	Market Type	Reason	Location	Local Reliability Area	Trade Date	MW	Commitment	INC_DEC	Hours	Begin Time	End Time
207	RT	T-138	N/A	N/A	29-Jul-10	258	No	INC	1	19:08	19:59
208	RT	T-138	PG&E	Humboldt	1-Jul-10	5- 10	No	INC	7	5:25	11:59
209	RT	T-138	PG&E	Humboldt	2-Jul-10	5- 15	No	INC	6	18:13	23:59
210	RT	T-138	PG&E	Humboldt	3-Jul-10	5	No	DEC	4	1:55	4:59
211	RT	T-138	PG&E	Humboldt	3-Jul-10	10	No	INC	12	0:00	11:59
212	RT	T-138	PG&E	Humboldt	12-Jul-10	5- 10	No	INC	10	7:37	16:59
213	RT	T-138	PG&E	Humboldt	17-Jul-10	10	No	INC	2	21:25	22:09
214	RT	T-138	PG&E	Humboldt	18-Jul-10	5	No	INC	1	21:15	21:49
215	RT	T-138	PG&E	Humboldt	22-Jul-10	0	No	INC	2	21:20	22:59
216	RT	T-138	PG&E	Humboldt	23-Jul-10	15	No	INC	10	8:40	17:04
217	RT	T-138	PG&E	Humboldt	24-Jul-10	5	No	INC	14	4:50	17:19
218	RT	T-138	PG&E	Humboldt	25-Jul-10	5- 15	No	INC	11	12:00	22:14
219	RT	T-161	N/A	N/A	29-Jul-10	43- 91	No	DEC	2	22:00	23:58
220	RT	T-161	N/A	N/A	29-Jul-10	135	No	INC	1	19:30	19:59
221	RT	T-161	SCE	Big Creek-Ventura	29-Jul-10	38- 568	No	DEC	5	19:30	23:59
222	RT	T-161	SCE	Big Creek-Ventura	30-Jul-10	40	Yes	INC	8	10:00	17:59
223	RT	T-161	SCE	LA Basin	30-Jul-10	20- 110	Yes	INC	17	7:00	23:59
224	RT	T-161	SCE	LA Basin	31-Jul-10	0	No	INC	1	0:00	0:59
225	RT	T-161	SDG&E	San Diego	29-Jul-10	22- 222	No	DEC	7	17:16	23:29
226	RT	T-161	SDG&E	San Diego	29-Jul-10	161- 427	Yes	INC	6	18:55	23:59
227	RT	T-161	SDG&E	San Diego	30-Jul-10	40- 215	Yes	INC	24	0:00	23:59
228	RT	T-165	PG&E	Sierra	17-Jul-10	18	No	DEC	2	17:25	18:14
229	RT	T-165	PG&E	Sierra	18-Jul-10	28- 39	Yes	DEC	3	17:00	19:04
230	RT	T-168	N/A	N/A	15-Jul-10	23	No	DEC	1	12:15	12:24
231	RT	T-168	PG&E	Fresno	15-Jul-10	198	No	DEC	1	12:15	12:34
232	RT	T-169	N/A	N/A	13-Jul-10	36	No	DEC	6	16:37	21:59
233	RT	T-169	N/A	N/A	13-Jul-10	455	No	INC	6	16:37	21:59

Number	Market Type	Reason	Location	Local Reliability Area	Trade Date	MW	Commitment	INC_DEC	Hours	Begin Time	End Time
234	RT	T-170	N/A	N/A	15-Jul-10	25- 107	Yes	DEC	2	12:45	13:09
235	RT	T-170	N/A	N/A	16-Jul-10	140	No	DEC	3	15:45	17:29
236	RT	T-170	N/A	N/A	16-Jul-10	352	No	INC	3	15:45	17:29
237	RT	T-170	N/A	N/A	17-Jul-10	352- 485	No	DEC	10	14:47	23:54
238	RT	T-170	PG&E	Fresno	16-Jul-10	308	No	DEC	1	4:15	4:16
239	RT	T-170	SCE	LA Basin	14-Jul-10	120	Yes	INC	4	17:50	20:59
240	RT	T-170	SCE	LA Basin	15-Jul-10	117	Yes	INC	7	12:15	18:59
241	RT	T-170	SCE	LA Basin	16-Jul-10	2	Yes	DEC	4	16:45	19:29
242	RT	T-170	SCE	LA Basin	16-Jul-10	37- 108	Yes	INC	4	16:45	19:59
243	RT	T-170	SCE	LA Basin	23-Jul-10	36	Yes	INC	3	15:50	17:04
244	RT	Telemetry Error	PG&E	N/A	14-Jul-10	0	No	INC	5	2:02	6:59
245	RT	Thermal Margin	SCE	LA Basin	13-Jul-10	25	No	INC	1	17:10	17:14
246	RT	Thermal Margin	SCE	LA Basin	14-Jul-10	25- 50	Yes	INC	17	7:00	23:59
247	RT	Thermal Margin	SCE	LA Basin	15-Jul-10	20	Yes	INC	17	7:00	23:59
248	RT	Thermal Margin	SCE	LA Basin	26-Jul-10	25- 50	Yes	INC	15	9:00	23:59
249	RT	Transmission Mitigation	PG&E	Stockton	7-Jul-10	3- 8	No	DEC	15	7:40	21:59
250	RT	Transmission Mitigation	SDG&E	N/A	15-Jul-10	20- 50	No	DEC	4	15:20	18:59
251	RT	Transmission Outage PG&E	PG&E	Bay Area	14-Jul-10	30- 153	No	INC	6	8:15	13:59
252	RT	Transmission Outage PG&E	PG&E	Humboldt	9-Jul-10	0	No	DEC	1	14:00	14:59
253	RT	Transmission Outage PG&E	PG&E	Humboldt	9-Jul-10	15	No	INC	7	8:05	14:59
254	RT	Transmission Outage PG&E	PG&E	N/A	13-Jul-10	10	No	DEC	6	10:18	15:59
255	RT	Transmission Outage PG&E	PG&E	NCNB	9-Jul-10	8- 14	No	DEC	13	0:01	12:59
256	RT	Transmission Outage SDG&E	N/A	N/A	16-Jul-10	10	No	DEC	2	13:21	14:59
257	RT	Transmission Outage SDG&E	N/A	N/A	20-Jul-10	1- 5	No	DEC	1	12:01	12:29
258	RT	Transmission Outage SDG&E	SDG&E	San Diego	1-Jul-10	47	Yes	DEC	1	19:55	19:59
259	RT	Transmission Outage SDG&E	SDG&E	San Diego	1-Jul-10	18- 257	Yes	INC	11	0:00	10:59
260	RT	Transmission Outage SDG&E	SDG&E	San Diego	2-Jul-10	200- 257	Yes	INC	10	0:00	9:59
261	RT	Transmission Outage SDG&E	SDG&E	San Diego	15-Jul-10	20- 270	No	DEC	18	6:00	23:59
262	RT	Transmission Outage SDG&E	SDG&E	San Diego	15-Jul-10	13- 230	No	INC	13	11:00	23:59

Number	Market Type	Reason	Location	Local Reliability Area	Trade Date	MW	Commitment	INC_DEC	Hours	Begin Time	End Time
263	RT	Transmission Outage SDG&E	SDG&E	San Diego	16-Jul-10	20- 65	No	DEC	10	14:00	23:59
264	RT	Transmission Outage SDG&E	SDG&E	San Diego	16-Jul-10	74- 230	No	INC	20	0:00	19:59
265	RT	Transmission Outage SDG&E	SDG&E	San Diego	24-Jul-10	3	Yes	DEC	3	13:20	15:59
266	RT	Transmission Outage SDG&E	SDG&E	San Diego	24-Jul-10	45	Yes	INC	3	13:20	15:59
267	RT	Unit Testing	N/A	N/A	23-Jul-10	172- 240	Yes	INC	2	9:21	10:45
268	RT	Unit Testing	PG&E	Bay Area	2-Jul-10	49- 93	No	DEC	10	14:45	23:59
269	RT	Unit Testing	PG&E	Bay Area	2-Jul-10	0	No	INC	10	14:45	23:59
270	RT	Unit Testing	PG&E	Bay Area	3-Jul-10	73- 93	No	DEC	24	0:00	23:59
271	RT	Unit Testing	PG&E	Bay Area	3-Jul-10	0	No	INC	24	0:00	23:59
272	RT	Unit Testing	PG&E	Bay Area	4-Jul-10	33- 123	No	DEC	24	0:00	23:59
273	RT	Unit Testing	PG&E	Bay Area	4-Jul-10	0	No	INC	24	0:00	23:59
274	RT	Unit Testing	PG&E	Bay Area	5-Jul-10	53- 123	No	DEC	9	15:25	23:59
275	RT	Unit Testing	PG&E	Bay Area	5-Jul-10	0	No	INC	9	15:40	23:59
276	RT	Voltage Control	PG&E	Fresno	11-Jul-10	308	No	INC	2	7:35	8:29

Appendix A: Explanation by Example

All examples listed below are based on fictitious data.

Example 1: Exceptional Dispatch Instructions Prior to DAM

In this fictitious example the ISO issued an exceptional dispatch instruction for resource A to be committed at its physical minimum (Pmin) of 50 MW from hours ending 5 through 10 for a generation procedure G-206. Similarly, the ISO issued additional instructions to resources B and C for the same reason as shown in Table 2. Generally exceptional dispatches prior to the day-ahead market are commitments to minimum load. In this case the dispatch levels are all at minimum load.

Table 2: Instructions Prior to Day-Ahead Market

Date	Market	Resource	Location	Local Reliability Area (LRA)	Begin Time	End Time	Dispatch Level (MW)	Reason
01-Jul-09	DA	A	SCE	LA BASIN	05:00	10:00	50	G-219
01-Jul-09	DA	B	SCE	LA BASIN	08:00	20:00	30	G-219
01-Jul-09	DA	C	SCE	LA BASIN	09:00	23:00	20	G-219.

This data is summarized as shown in Table 3, which is the prescribed format specified in the FERC order on September 02, 2009. This summary classifies the data by reason, resource location, local reliability area, and trade date. The MW column in Table 3 is the range of MW; in this case the minimum instruction MW is 20 MW for resource C which occurs from hours ending 21 through 23. The maximum instruction occurs in hour ending 10. In this hour resource A is committed at 50 MW, resource B is committed at 30 MW and resource C is committed at 20 MW. This adds up to 100 MW. Thus the MW column shows the minimum and maximum of the overlaps of all the exceptional dispatch instructions. The commitment column shows whether a resource was committed between the begin time and end time. Commitments are broken out separately from energy dispatches. In the day-ahead, however the exceptional dispatches are nearly always just commitments, as in this example. The begin time shows hour ending 5 as this was the hour ending for first dispatch of the day, and the end time shows hour ending 23, as this was the hour with last dispatch. It is also possible that there might be some hours between the begin time and the end time where there might not be exceptional dispatch instructions for the given reason, meaning that the range between the begin time and end time can include null hours with no dispatch.

Table 3: FERC Summary of Instructions Prior to DAM

Number	Market Type	Reason	Location	Local Reliability Area (LRA)	Trade Date	MW	Commitment	INC/DEC	Hour	Begin Time	End Time
1	DA	G-219	SCE	LA Basin	1-Jul-09	20-100	Yes	N/A	19	05:00	23:00

Example 2: Incremental Exceptional Dispatch Instructions in RTM

In this fictitious example the ISO issued an exceptional dispatch instruction to resource A to be committed at its Pmin of 30 MW from hours ending 7 through 11 after completion of the day-ahead market for the transmission procedure T-138. This resource did not have a day-ahead award in those hours. The ISO issued another exceptional dispatch instruction to resource B, to be dispatched at 40 MW from hours ending 8 through 9 in real-time for the transmission procedure T-138. This resource had a day-ahead schedule of 20 MW from the day-ahead market, which implies that this exceptional dispatch instruction was an incremental instruction and the exceptional dispatch MW was 20 MW. Similarly, the details of exceptional dispatch (ED) instruction for resource C is shown in Table 4.

Table 4: Incremental Exceptional Dispatch Instructions in RTM

Date	Market	Resource	Location	Local Reliability Area (LRA)	Begin Time	End Time	Dispatch Level (MW)	Day-Ahead Award (MW)	Commitment	INC/DEC	ED (MW)	Reason
01-Jul-09	RT	A	PG&E	Humboldt	06:00	11:00	30	0	Yes	INC	30	t-138
01-Jul-09	RT	B	PG&E	Humboldt	07:00	09:00	40	20	No	INC	20	t-138
01-Jul-09	RT	C	PG&E	Humboldt	12:00	15:00	50	50	No	INC	0	t-138
01-Jul-09	RT	C	PG&E	Humboldt	16:00	20:00	50	40	No	INC	10	t-138

This data is summarized as shown in Table 5 and is classified by reason, resource location, local reliability area, and trade date. The MW column in Table 5 is the range of MW; in this case the minimum instruction MW is 0 MW for resource C which occurs from hours ending 13 through 15. The maximum instruction occurs in hours ending 8 & 9, as during these two hours both resources A and B have an ED MW of 30MW and 20MW, respectively. This adds up to 50 MW. Thus the MW column shows the minimum and maximum of the overlaps of all the Exceptional dispatch instructions. The commitment column shows whether a resource was committed between the begin time and end time. This column shows a commitment if there was a single commitment in the entire interval of exceptional dispatch. The begin time shows the time of the first dispatch of the day. This is a time not a range. Similarly the end time shows a time and not a range. Exceptional dispatches occurred between these two times. Since there was a commitment between the begin time and end time then the commitment column displays yes for the summary. Similarly, the INC/DEC column shows an INC as there was an incremental dispatch between the begin time and end time. As mentioned in the previous example it is possible that there might be some hours between the begin time and end time where there were no exceptional dispatch instructions for the given reason.

Table 5: FERC Summary of ED Instructions in RTM

Number	Market Type	Reason	Location	Local Reliability Area (LRA)	Trade Date	MW	Commitment	INC/DEC	Hour	Begin Time	End Time
1	RT	T-138	PG&E	Humboldt	1-Jul-09	0-50	Yes	INC	15	06:00	20:00

Example 3: Decremental Exceptional Dispatch Instructions in RTM

This example highlights decremental exceptional dispatch instructions in the real-time market. In this fictitious example the ISO issued an exceptional dispatch instruction to resource A to be committed at its Pmin of 20 MW from hours ending 15 through 20 after completion of the day-ahead market for the transmission procedure T-129. The ISO issued additional exceptional dispatch instructions for resources B and C; details of those instructions are shown in Table 6.

Table 6: Decremental Exceptional Dispatch Instructions in RTM

Date	Market Type	Resource	Location	Local Reliability Area (LRA)	Begin Time	End Time	Dispatch Level (MW)	Day-Ahead Award (MW)	Commitment	INC/ DEC	ED (MW)	Reason
01-Jul-09	RT	A	PG&E	Fresno	15:00	20:00	20	0	Yes	INC	20	t-129
01-Jul-09	RT	B	PG&E	Fresno	07:00	09:00	40	60	No	DEC	20	t-129
01-Jul-09	RT	C	PG&E	Fresno	10:00	14:00	40	50	No	DEC	10	t-129

This data is summarized according to FERC convention as shown in Table 7. This summary classifies the data by reason, resource location, local reliability area, and trade date. Please note that inc and dec are broken out separately. The inc entry is self-explanatory and similar to the previous example. Regarding the dec entry the MW column is the range of MW; in this case the minimum dec instruction is 10 MW (actually -10MW as it is a dec) for resource C which occurs from hours ending 10 through 14. The maximum instruction occurs from hours ending 7 through 9, when resource B was issued a dec instruction of 20 MW. Thus the MW column shows the minimum and maximum of the overlaps of all the exceptional dispatch instructions. The commitment column shows whether a resource was committed between the begin time and end time.

Table 7: FERC Summary of Decremental ED Instructions in RTM

Number	Market Type	Reason	Location	Local Reliability Area (LRA)	Trade Date	MW	Commitment	INC/DEC	Hour	Begin Time	End Time
1	RT	T-129	PG&E	Fresno	1-Jul-09	20	Yes	INC	6	15:00	20:00
1	RT	T-129	PG&E	Fresno	1-Jul-09	10-20	Yes	DEC	8	07:00	14:00

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 15th day of September, 2010.

/s/ Anna Pascuzzo

Anna Pascuzzo