

January 22, 1999

The Honorable David P. Boergers
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Pacific Gas & Electric Company, Docket No. ER97-2358-000 et al.

Dear Secretary Boergers:

Enclosed for filing are an original and seven copies of the Prepared Cross-Answering Testimony and Summaries of Jeffrey C. Miller and Stephen T. Greenleaf on behalf of the California Independent System Operator Corporation. This matter is currently pending before Judge Bruce L. Birchman.

Also enclosed in an extra copy of the filing. Please stamp the additional copy with the date and time filed and return it to the messenger. Thank you for your assistance.

Sincerely,

Michael E. Ward
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W.
Washington, D.C. 20007

Counsel for the California
Independent System Operator
Corporation

Enclosures

cc: The Honorable Bruce L. Birchman
Restricted Service List

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing documents upon each person designated on the restricted service list in this proceeding.

Dated at Washington, D.C. on this 22nd day of January, 1999.

Sean A. Atkins
Counsel for the California Independent
System Operator Corporation