

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

San Diego Gas & Electric Company,	)	
Complainant,	)	
v.	)	Docket No. EL00-95-____
Sellers of Energy and Ancillary Services	)	
Into Markets Operated by the California	)	
Independent System Operator and the	)	
California Power Exchange,	)	
Respondents, <i>et al.</i>	)	

**MOTION TO CONSOLIDATE REPORTS**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. § 385.212 the California Independent System Operator Corporation ("ISO")<sup>1</sup> hereby submits this Motion To Consolidate Reports as required by Commission's orders in the above-captioned dockets.

In support whereof, the ISO states as follows:

**I. COMMUNICATIONS**

Please address communications concerning this filing to:

Margaret A. Rostker, Esq.  
The California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
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<sup>1</sup> Capitalized terms not otherwise defined herein have the meaning set forth in the ISO Tariff Master Definition Supplement, Appendix A.

## II. BACKGROUND

In its April 26, 2001, "Order Establishing Prospective Mitigation and Monitoring Plan for the California Wholesale Electric Markets And Establishing An Investigation of Public Utility Rates in Wholesale Western Energy Markets,"<sup>2</sup> the Commission directed the ISO to file quarterly reports "analyzing how the mitigation plan is operating as well as the progress that has been made in developing new generation and demand response." April 26 Order, slip op. at 25. The ISO has complied with this order, submitting such reports on September 14, 2001 and December 14, 2001.

In its June 19, 2001, "Order on Rehearing of Monitoring and Mitigation Plan for the California Wholesale Electric Markets, Establishing West-Wide Mitigation and Establishing Settlement Conference,"<sup>3</sup> the Commission required the ISO to file:

"on or before March 26, 2002, a report on market conditions that addresses among other things: (1) a list of new generating resources (including the nameplate capacity) that the State of California has announced this year would be on line by summer 2002 and which of those facilities actually are on line. . . and (2) the continued progress in executing long-term contracts and reducing the reliance on the spot market."

June 19 Order, slip op. at 40.

The June 19 Order also provides that, "[o]ur requirement for quarterly reports will continue." *Id.*

## III. BASIS FOR REQUEST TO CONSOLIDATE REPORTS

The ISO notes that the next quarterly report, required by the April 26 Order, is due on March 14, 2002, only twelve (12) days before the report ordered in the June 19 Order is due. These reports will contain similar, if not the same material, and therefore, the ISO respectfully requests the Commission to allow the ISO to consolidate these two reports into one report that the ISO will submit on or before March 26, 2002, the date established for the report required by the June 19 Order. Consolidating these reports will reduce the burden on Commission staff, as well as other interested parties, from reviewing similar, if not identical reports, and also will create a comprehensive report that will provide the Commission with all the information it seeks in one, rather than two, documents.

<sup>2</sup> 95 FERC ¶ 61, 115 (2001) ("April 26 Order").

<sup>3</sup> 95 FERC ¶ 61, 418 (2001) ("June 19 Order").

**IV. CONCLUSION**

WHEREFORE, for the foregoing reasons, the ISO respectfully requests that the Commission permit it to consolidate the reports required by the April 26 Order and June 19 Order and submit such a report on or before March 26, 2002.

Respectfully submitted,

Margaret A. Rostker  
Counsel for The California Independent  
System Operator Corporation  
151 Blue Ravine Road  
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February 8, 2002

The Honorable Magalie Roman Salas  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**Re: *San Diego Gas & Electric Company v. Sellers of Energy and Ancillary Services  
Into Markets Operated by the California Independent System Operator and the  
California Power Exchange  
Dockets No. EL00-95, et seq.***

Dear Secretary Salas:

Enclosed for electronic filing please find The California Independent System Operator Corporation's Motion to Consolidate Reports in the above-captioned dockets.

Thank you for your assistance in this matter.

Respectfully submitted,

Margaret A. Rostker  
Counsel for The California Independent  
System Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
(916) 608-7147

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the California Independent System Operator Corporation's Motion to Consolidate Reports upon each person designated on the official service list compiled by the Secretary in the above-captioned dockets.

Dated at Folsom, California, on this 8<sup>th</sup> day of February, 2002.

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Margaret A. Rostker  
Counsel for The California Independent  
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