

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

California Independent System)	Docket No. ER04-835-000
Operator Corporation)	
Pacific Gas and Electric Company)	Docket No. EL04-103-000
v.)	
California Independent System)	
Operator Corporation)	

**MOTION FOR SCHEDULING/DISCOVERY CONFERENCE AND REQUEST
FOR SHORTENED ANSWER PERIOD**

To: Honorable H. Peter Young
Presiding Administrative Law Judge

The ISO has recently identified a significant error in its supporting data that is likely to affect Intervenor testimony and positions. The data in question represent the ISO's attempt to identify how Minimum Load Costs would have been allocated in 2003 and early 2004 had Amendment No. 60 been effective during that period. Specifically, after a number of intervenors raised questions about the ISO's use of the must-offer obligation to manage inter-zonal congestion, the ISO re-examined a portion of the data that attribute \$25.5 million in Minimum Load Costs to the zonal category in 2003. The initial "snap-shot" examination indicates that a large part of that Minimum Load Costs attributed to "Path 26" should have been attributed to other causes and that the remainder of the data must be reexamined. This reexamination would take a minimum of two weeks.

In light of this development, the ISO respectfully requests that the Presiding Judge convene a scheduling/discovery conference as soon as is convenient in order to address the issues that this presents. The ISO understands that the Presiding Judge will be unavailable through October 4, 2004, and therefore requests that such a conference be held on Tuesday, October 5, 2004.

In order to use the time most efficiently, the ISO proposes scheduling an informal conference with the parties apart from the Presiding Judge on Tuesday morning, and scheduling the formal conference with the Presiding Judge on Tuesday afternoon.

Should this Motion be granted, the ISO further requests that, for the convenience of parties in California, telephonic or video participation be permitted and provided for.

Finally, in light of the rapid approach of intervenors' testimony and other procedural schedule dates, the ISO also requests a shortened time for responses to this motion.¹

Respectfully submitted,

/s/ Julia Moore

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September 28, 2004

¹ The ISO canvassed parties' opinions on this matter via e-mail prior to filing this motion, and, of the parties that were able to respond in the short time available to do so, no party opposed this proposal (although October 5 was not the preferred date of all parties).

CERTIFICATE OF SERVICE

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

Dated at Folsom, CA, on this 28th day of September, 2004.

/s/ Anthony J. Ivancovich
Anthony J. Ivancovich