

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

California Independent System)
Operator Corporation) Docket No. ER98-1019-001
)
)

**ANSWER OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
TO MOTIONS TO INTERVENE**

Pursuant to Rule 213 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213 (1997), the California Independent System Operator Corporation ("ISO") submits this answer to the motions to intervene submitted in this docket. As stated herein, the ISO does not oppose any of the interventions.

I. BACKGROUND

On June 1, 1998, the ISO submitted a compliance filing amending the ISO Tariff (including the ISO Protocols), the ISO Code of Conduct, the Transmission Control Agreement, certain of the ISO's pro forma operating agreements, and certain of the ISO's bilateral operating agreements.¹ Included in the June 1, 1998

¹ Capitalized terms used herein and not defined are used with the meanings given in the Master Definitions Supplement, Appendix A to the ISO Tariff.

compliance filing were amendments to the bilateral Interim Black Start Agreement (“IBSA”).²

The Commission noticed the ISO’s filing on June 9, 1998, with interventions and protests due by August 5, 1998. The Commission specified that comments related to the IBSA were to be submitted in Docket No. ER98-1019-001.

Interventions were filed by five parties: the Western Area Power Administration, the California Department of Water Resources, Enron Power Marketing, Inc., the California Electricity Oversight Board, and CalEnergy Company, Inc. None of the interventions raised substantive issues concerning the IBSA.³ By order dated August 14, 1998, the Commission granted the ISO’s motion for an extension of time to respond to all of the interventions in the various compliance dockets, including this matter.

II. DISCUSSION

The ISO does not oppose the intervention of any of the parties that have moved to intervene in this proceeding. Given that no party has raised a substantive issue concerning the compliance filing with respect to the IBSA, the ISO respectfully requests that the Commission approve the amendments filed by the ISO in the compliance filing.

² By order dated February 25, 1998, the Commission conditionally accepted the IBSA for filing and directed the ISO to revise the IBSA to conform to the order issued December 17, 1997, *Pacific Gas and Electric Co. et al.*, 81 FERC ¶ 61,320 (1997). *California Independent System Operator Corporation*, 82 FERC ¶ 61,180 at 61,671 (1998). The amendments were to be filed within 60 days of the start of ISO operations. *Id.*

³ The Western Area Power Administration’s pleading is entitled Motion to Intervene and Comments. However, the substantive issues raised in this pleading do not concern the IBSA.

III. CONCLUSION

Wherefore, for the reasons stated herein, the ISO respectfully requests that the motions to intervene be granted and that the Commission accept, without modification, the ISO's compliance filing of the IBSA.

Respectfully submitted,

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Dated: September 3, 1998

CERTIFICATE OF SERVICE

I hereby certify I have this day served this document upon each person designated on the official service list compiled by the Secretary in this docket 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 Washington, D.C. on this 3rd day of September, 1998.

David B. Rubin

September 3, 1998

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

**Re: California Independent System Operator Corporation
Docket No. ER98-1019-001**

Dear Secretary Boergers:

Enclosed is an original and fourteen copies of the Answer of the California Independent System Operator Corporation To Motions To Intervene in the above-captioned docket.

Also enclosed is an extra copy of the filing to be time/date stamped and returned to us by the messenger. Thank you for your assistance.

Respectfully submitted,

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Counsel for the California
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Enclosures
cc: Service List

