

April 19, 1999

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

Re: Southern California Edison Co., California Independent System  
Operator Corp., El Segundo Power, LLC, Docket Nos. ER98-441-000  
And ER98-2550-000

Pacific Gas & Electric Co., Duke Energy Moss Landing LLC, and  
Duke Energy Oakland LLC, Docket Nos. ER98-495-000,  
ER98-1614-000, ER98-2145-000, ER98-2668-000,  
ER98-2669-000, ER98-4296-000 and ER98-4300-000

San Diego Gas & Electric Co., Docket Nos. ER98-496-000 and  
ER98-2160-000

Southern California Edison Co., Pacific Gas & Electric Co., San Diego  
Gas & Electric Co., Duke Energy Moss Landing LLC, Duke Energy  
Oakland LLC, Docket Nos. ER98-441-001, ER98-495-001,  
ER98-496-001, ER98-4300-001, ER98-2668-001, ER98-2669-001,  
ER98-4296-001, ER98-2668-000, ER98-2669-000, ER99-1127-000,  
ER99-1128-000, ER98-4296-000 and ER98-4300-000

Dear Mr. Boergers:

In accordance with the provisions of Rule 602 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. § 385.602 (1998), and the Chief Administrative Law Judge's March 16, 1999 Order, enclosed please find an original and fourteen copies of the Initial Comments of the California Independent System Operator Corporation ("ISO") in Support of the Offer of Settlement submitted on April 2, 1999, by El Segundo Power LLC, Pacific Gas and Electric Company, Duke Energy Moss Landing LLC, Duke Energy Oakland LLC, Duke Energy South Bay, LLC, San Diego Gas & Electric Company, Williams Energy Marketing & Trading Company, Reliant Energy Etiwanda, L.L.C., Reliant Energy

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Mandalay, L.L.C., Southern Energy Delta, L.L.C., Southern Energy Potrero, L.L.C., Cabrillo Power I LLC, Cabrillo Power II LLC, Geysers Power Company, LLC, the California Electricity Oversight Board, Southern California Edison Company, Enron Power Marketing, Inc., and the ISO in the above-captioned dockets.

The matters encompassed by the Offer of Settlement either have been specifically set for hearing or are intertwined with matters set for hearing. The various cases in which the hearing matters arose have been retained for consideration by the Chief Administrative Law Judge who has acted as a Settlement Judge under Rule 603 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.603 (1998). Accordingly, the ISO will provide a copy of this filing to him.

An additional copy of this filing is enclosed. Please stamp this copy with the date and time of filing and return it to our messenger.

Respectfully submitted,

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Edward Berlin  
J. Phillip Jordan  
Mark R. Klupt  
Swidler Berlin Shereff Friedman, LLP  
Attorneys for the California Independent  
System Operator Corporation

cc: Hon. Curtis L. Wagner Jr.  
Service List

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served the foregoing document upon all parties on the official service list compiled by the Secretary in the above-captioned dockets, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 CFR § 385.2010).

Dated at Washington, D.C. this 19<sup>th</sup> day of April, 1999.

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Mark R. Klupt