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**AMERICAN ARBITRATION ASSOCIATION**

RELIANT ENERGY POWER ) CASE NO. 71 198 00295 99  
GENERATION, INC., a Delaware )  
Corporation; RELIANT ENERGY ) **SUMMARY OF CLAIM FOR DAMAGES**  
ETIWANDA, LLC, a Delaware Limited ) **AND DECLARATORY RELIEF**  
Liability Company; RELIANT ENERGY )  
MANDALAY, LLC, a Delaware Limited )  
Liability Company; and RELIANT ENERGY )  
SERVICES, INC., a Delaware Corporation, )  
Claimants, )  
v. )  
CALIFORNIA INDEPENDENT SYSTEM )  
OPERATOR CORPORATION, a California )  
Nonprofit Public Benefit Corporation; and )  
DOES 1-500, )  
Respondents.)

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SOUTHERN CALIFORNIA EDISON )  
COMPANY, a California corporation, )  
Claimant, )  
v. )  
RELIANT ENERGY POWER )  
GENERATION, INC., a Delaware )  
Corporation; RELIANT ENERGY )  
ETIWANDA, LLC, a Delaware Limited )  
Liability Company; RELIANT ENERGY )  
MANDALAY, LLC, a Delaware Limited )  
Liability Company; and RELIANT ENERGY )  
SERVICES, INC., a Delaware Corporation, )  
CALIFORNIA INDEPENDENT SYSTEM )  
OPERATOR CORPORATION, a California )  
Nonprofit Public Benefit Corporation; and )  
DOES 500-600, )  
Respondents.)

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1 Claimant, Southern California Edison Company (“Edison”), has submitted claims  
2 against the Respondents California Independent System Operator Corporation  
3 (“ISO”), Reliant Energy Power Generation, Inc., Reliant Energy Etiwanda, LLC,  
4 Reliant Energy Mandalay, LLC, and Reliant Energy Services, Inc. (collectively,  
5 “Reliant”) for damages and declaratory relief. Edison’s claim states that the ISO  
6 Tariff, Protocols, and the FERC-jurisdictional Reliability Must-Run Agreements  
7 (“RMR Contracts”) provide that market revenues associated with the provision of  
8 ancillary services under RMR contract dispatches should be paid to Edison as the  
9 Participating Transmission Owner in whose service territory the Reliant Must-  
10 Run Generators are located. Edison also states that the RMR Contracts specify  
11 the compensation to be provided to Reliant for ancillary services supplied under  
12 RMR Contract dispatches. Market revenues are not part of that compensation.  
13 Therefore, Edison claims that the approximately \$8 million of such revenues  
14 currently held by the ISO should be paid to Edison. Edison also requests a  
15 declaration that the ISO shall (1) review the Reliant RMR Contract invoices, (2)  
16 calculate the amount due based on the information available to it and the ISO  
17 Tariffs and Protocols, (3) deduct from the Reliant RMR contract invoices the  
18 market revenues for energy and ancillary services provided pursuant to Reliant  
19 RMR Contract dispatches if not already deducted by Reliant or pay such revenues  
20 directly to Edison, and (4) pay to Edison the approximately \$8 million held by the  
21 ISO on deposit for the period April through September, 1998.

22 DATED: August 6, 1999

23 By: \_\_\_\_\_  
24 Michael D. Mackness  
25 Attorney for  
26 SOUTHERN CALIFORNIA  
27 EDISON COMPANY

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