

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

California Independent System Operator Corporation)))	Docket Nos. ER01-313-000 ER01-313-001
Pacific Gas and Electric Company))	Docket Nos. ER01-424-000 ER01-424-001

**ANSWER OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION TO COMMISSION
TRIAL STAFF'S MOTION TO COMPEL**

To: The Honorable Bobbie J. McCartney
Presiding Administrative Law Judge

Pursuant to Rule 213 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213, the California Independent System Operator Corporation ("ISO") files this Answer to the Motion to Compel Answers to Data Requests to Shorten the Response Time of the Commission Trial Staff ("Staff").

On June 5, 2001, Staff filed a Motion to Compel Answers to Data Requests from the ISO in the above-captioned docket. Staff noted in the Motion that there were 28 outstanding data responses to which the ISO was late in responding. Staff requested that the Presiding Judge order the ISO to respond to the Motion by June 8, 2001.

On June 7, 2001, the Presiding Judge issued an order requiring the ISO to respond to Staff's Motion by June 11, 2001, per their request, and setting an oral argument on the Motion. The June 7 Order also stated that at the oral argument the parties should be prepared to discuss the Motion, the procedural schedule and such other and further matters as may be necessary and appropriate.

As of this afternoon, the ISO has provided written responses to the 28 data requests to the Staff. Some documents responsive to the questions, however, are in production and will be provided on Monday, June 11, 2001 to supplement the written responses.

The ISO regrets its failure to complete its responses to certain of Staff's data requests in a timely manner. The delay in completing the responses was caused by the considerable competing demands placed on ISO personnel during the current crisis in California. The ISO will make every effort to ensure that such delays do not occur going forward.

Respectfully submitted,

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Date June 8, 2001

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 proceeding, 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, DC this 8th day of June, 2001.

Julia Moore
(202) 295-8357

June 8, 2001

The Honorable David P. Boergers
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: California Independent System Operator Corporation,
Docket Nos. ER01-313-000 and ER01-313-001**

**Pacific Gas and Electric Company
Docket Nos. ER01-424-00 and ER01-424-001**

Dear Secretary Boergers:

Enclosed for filing are one original and 14 copies of the Answer of the California Independent System Operator to the Motion to Compel of the Commission Trial Staff in the above-referenced proceeding. Two courtesy copies of this pleading have been provided to Presiding Administrative Law Judge Bobbie J. McCartney. Two additional copies of the filing are also enclosed. Please stamp the two additional copies with the date and time filed and return them to the messenger.

Thank you for your assistance in this matter.

Respectfully submitted,

Julia Moore
(202) 295-8357

Attorney for the California Independent
System Operator Corporation

CC: The Honorable Bobbie J. McCartney
Service List