

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

**California Independent System) Docket No. ER08-617-000
Operator Corporation)**

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

On February 29, 2008, the California Independent System Operator Corporation (“ISO”) submitted in the above-referenced proceeding the Interconnected Balancing Authority Area Operating Agreement as Amended and Restated (“Amended IBAAOA”) between the ISO and the Western Area Power Administration, Desert Southwest Region (“WALC”).¹ The Commission established a March 21, 2008, comment date concerning the ISO’s filing. In response, several parties submitted motions to intervene.² Further, TANC filed comments in support of the ISO’s filing and MWD filed comments containing proposed changes to the Amended IBAAOA.

The ISO does not object to any of the parties’ motions to intervene. Pursuant to Rule 212 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.212, the ISO hereby files its answer to the comments submitted by

¹ Capitalized terms not otherwise defined herein have the meanings set forth in the Master Definitions Supplement, Appendix A to the ISO Tariff, and in the Amended IBAAOA.

² The following parties filed motions to intervene: the City of Santa Clara, California, doing business as Silicon Valley Power, the City of Redding, California, and the M-S-R Public Power Agency; Griffith Energy LLC; the Metropolitan Water District of Southern California (“MWD”); the Modesto Irrigation District; and the Transmission Agency of Northern California.

MWD. For the reasons explained below, the ISO would have no objection to making all of changes to the Amended IBAAOA proposed in MWD's comments.

I. Answer

After MWD filed its comments, the ISO discussed them with WALC, MWD, and Southern California Edison Company ("SCE"), each of whom is referenced in the Amended IBAAOA. Based on these discussions and on its own review of MWD's comments, the ISO would have no objection to making all of the changes to the Amended IBAAOA proposed in the comments. These changes will permit the Amended IBAAOA to more accurately reflect the Interconnections' parameters and the operational jurisdiction and coordination by the various entities described in the Amended IBAAOA.

Specifically, MWD proposes the following in its comments:

- That the ISO maintain the original text Section 3.2.7 of the Amended IBAAOA referencing joint implementation of procedures by the ISO, WALC, and Transmission Owners (rather than Participating Transmission Owners as proposed by the ISO).³
- That the ISO revise Service Schedule 1 to the Amended IBAAOA ("Service Schedule 1") to state that the Transmission Owner for the Camino-Mead transmission lines is MWD.⁴

³ MWD at 6-7.

⁴ *Id.* at 7-8.

- That the ISO modify Service Schedule 1 to replace the phrase “Gene Pumping Plant,” which appears after “ISO Terminal:” and “Point of Interconnection:”, with “Gene 230 kV Switchyard.”⁵
- That the ISO revise the first sentence of Service Schedule 1 to describe one of the six interconnections between the ISO and WALC as “Gene 230 kV Switchyard” rather than “Parker Generating Plant.”⁶
- That the ISO modify Service Schedule 4 to the Amended IBAAOA to delete the phrase “and has operational jurisdiction of” after “MWD” and to change the phrase “transmission line” to “transmission lines.”
- That the ISO revise Service Schedule 5 to the Amended IBAAOA (“Service Schedule 5”) to add the phrase “coordinated with ISO and SCE” after “MWD and WALC issue intercompany clearances.”⁷
- That the ISO revise Service Schedule 5 to change the phrase “MWD and WALC issue intercompany clearances” to “SCE and WALC issue intercompany clearances, coordinated with ISO and MWD.”⁸

As stated above, the ISO would not have any objection to making all of the listed changes to the Amended IBAAOA.

⁵ *Id.* at 8.

⁶ *Id.*

⁷ *Id.* at 9.

⁸ *Id.*

II. Conclusion

For the reasons explained above, the Commission should accept the Amended IBAAOA as filed, subject to the discussion above.

Respectfully submitted,

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Dated: April 4, 2008

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the above-referenced 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, D.C. this 4th day of April, 2008.

/s/ Bradley R. Miliauskas
Bradley R. Miliauskas