

January 13, 2003

Attn: Commission's Docket Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Docket # I.00-11-001, Clarification to the January 9, 2003, Prehearing Conference
Statement of the California Independent System Operator

Dear Clerk:

Enclosed for filing please find an original and eight copies of the Clarification to the January 9, 2003, Prehearing Conference Statement of the California Independent System Operator Corporation in Docket # I.00-11-001. Please date stamp one copy and return to California ISO in the self-addressed stamped envelope provided.

Thank you.

Sincerely,

Jeanne M. Solé
Regulatory Counsel

Cc: Attached Service List

**PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation into)
implementation of Assembly Bill 970 regarding) I.00-11-001
the identification of electric transmission and)
distribution constraints, actions to resolve those)
constraints, and related matters affecting the)
reliability of electric supply.)
_____)

**CLARIFICATION TO THE JANUARY 9, 2003, PREHEARING CONFERENCE
STATEMENT
OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR**

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Dated: January 13, 2003

**PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation into)
implementation of Assembly Bill 970 regarding) I.00-11-001
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**CLARIFICATION TO THE JANUARY 9, 2003, PREHEARING CONFERENCE
STATEMENT
OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR**

On January 9, 2002, the California Independent System Operator (“CA ISO”) submitted a Prehearing conference (“PHC”) statement in the above captioned docket. London Economics International, LLC (“LEI”) has raised with the CAISO, the possibility that the statement might be misread to imply that the modeling software, PoolMOD, is inherently incapable of delivering credible results. The CAISO seeks to clarify that the concerns it raised about PoolMOD pertain solely to its simplified representation of the Western Interconnection. The CA ISO and LEI are still investigating the extent to which this simplification would impact the overall study results and whether such impact is significant. However, this can ultimately only be determined by conducting an identical analysis with software having a more detailed representation of the Western Interconnection and cross-comparing the results. The CAISO and LEI concur that it would be prudent to make such a comparison before presenting definitive results as to a specific investment — Path 26 — to the Board.

PoolMOD was selected for testing the proposed evaluation methodology using the Path 26 expansion plan as a specific case study because this software was readily available and could be tailored to specific aspects of the methodology within a reasonable time horizon and at a reasonable cost. The cost of licensing and then tailoring alternative software products was deemed to be unwarranted, particular at a time of considerable uncertainty over future market rules and, hence, the best models for representing them. The CAISO, and LEI in supporting the use of PoolMOD, recognize that models are designed to address specific tasks, and this involves compromises. PoolMOD is designed to model long time periods, to commit and dispatch hydro using a pricing model (as opposed to ‘peak shaving’), and to incorporate systematic bid markups to represent the effect of strategic behavior. A simplified transmission representation facilitates the incorporation of these features. Other models may embody different simplifications, which may make some of them less suited to modeling long time periods and incorporating strategic bidding.

As pointed out pointed in its PHC statement, the CAISO and LEI concur that additional scenario analysis, beyond what could be accomplished by February, would also be necessary to increase the robustness of the results. In addition, further analysis of several other aspects of the methodology, (specifically, approaches to modeling long-term new generation entry, strategic bidding, and the approach for assigning probability weights to individual scenarios) is advised before viewing results on Path 26 as sufficient for making a formal recommendation.

January 9, 2003 Respectfully Submitted:

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PROOF OF SERVICE

I hereby certify that on January 13, 2003, I served by electronic and U.S. mail, the Clarification to the January 9, 2003, Prehearing Conference Statement of the California Independent System Operator in Docket # I. 00-11-001.

DATED at Folsom, California on January 13, 2003.

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