

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

Petition of San Diego Gas & Electric Company)	Petition 07-11-007
(U 902 E) to Adopt, Amend or Repeal a Regulation)	
Pursuant to Public Utilities Code § 1708.5)	
_____)	

**RESPONSE OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
TO THE PETITION OF SAN DIEGO
GAS & ELECTRIC COMPANY (U 902 E)**

On November 6, 2007, San Diego Gas & Electric Company filed a Petition asking the Commission to Adopt, Amend, or Repeal a Regulation Pursuant to Public Utilities Code § 1708.5 (the “Petition”). The California Independent System Operator Corporation (the “ISO”) submits this response pursuant to Rule 6.3(d) of the Commission’s Rules of Practice and Procedure and the Notice Regarding Time Line for Responding to P.07-11-007, issued December 3, 2007.

The Petition asks the Commission to issue an Order Instituting Rulemaking to determine whether, after the October 2007 California wild fires, additional regulations and rules should be adopted regarding disaster preparedness and management, among other things. Although the Petition does not contain any specific proposals for comment, the ISO stands ready to assist the PUC and other agencies that have responsibility for fire prevention in any efforts to prepare for future fire seasons. In addition to the overriding concerns about public safety, fires can also affect the ISO’s ability to operate the transmission system by causing transmission lines to trip out of service. When fires do threaten the grid, the ISO coordinates its operations closely with firefighting agencies and

utilities. As the Petition suggests, the ISO may be of assistance on the question of “[h]ow to best coordinate efforts among agencies, municipalities, local jurisdictions, and utilities to ensure the most efficient and effective disaster management practices.” Petition at 5; *see also* Petition at 2 & 5 (identifying the ISO as an entity involved in disaster response and recovery).

Accordingly, the ISO looks forward assisting the Commission with any processes or proposals it may consider in this docket.

Respectfully submitted,

December 27, 2007

By: /s/ Daniel J. Shonkwiler

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CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic mail, the Response Of The California Independent System Operator To The Petition Of San Diego Gas & Electric Company (U 902 E) in Docket Number P.07-11-007.

Executed on December 27, 2007, at Folsom, California.

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