



California Independent
System Operator Corporation

December 6, 2006

Via Electronic Filing

The Honorable Magalie R. Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: California Independent System Operator Corporation
Docket No. ER07-142-000**

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceeding is a Motion of the California Independent System Operator Corporation for Leave to File Answers and Answers to Comments.

Thank you for your attention to this matter.

Yours truly,

/s/ Grant Rosenblum
Grant Rosenblum

Counsel for the California Independent
System Operator Corporation

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

California Independent System Operator
Corporation

Docket No. ER07-142-000

**MOTION OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION FOR LEAVE
TO FILE ANSWERS, AND ANSWERS TO
COMMENTS**

Pursuant to Rule 213 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213 (2004), the California Independent System Operator Corporation ("CAISO") hereby moves for leave to file limited answers to the comments submitted by Southern California Edison Company ("SCE") and the Sacramento Municipal Utility District ("SMUD") on November 21, 2006 in the above-referenced proceeding. No party opposes the Tariff amendments filed by the CAISO in this proceeding, but SCE and SMUD propose minor corrections or clarifications to the filed Tariff language.¹

In its comments, SCE identifies two errors in the CAISO's proposed Tariff amendments. The first relates to the definition of "Export Percentage," which is set forth in proposed ISO Tariff Appendix A and EIRP 5.3.2.² SCE points out that the definition should be modified as follows: "... as the ratio of the Participating Intermittent Resource's Pmax in the ISO Master File **minus the MW** subject to an exemption under EIRP 5.3.2 on a MW basis to the Participating Intermittent Resource's Pmax in the ISO Master File." SCE is correct that the bolded words should be included. The accuracy of

¹ There is no prohibition on an Answer to comments. To the extent necessary, however, the CAISO requests waiver of Rule 213(a)(2) (18 C.F.R. § 385.213(a)(2)) to permit it to make this answer. Good cause for this waiver exists here because the answer will aid the Commission in understanding the issues in the proceeding, provide additional information to assist the Commission in the decision-making process, and help to ensure a complete and accurate record in this case. (See, e.g., *Entergy Services, Inc.*, 101 FERC ¶ 61,251, at 61,886 (2002); *Delmarva Power & Light Company*, 93 FERC ¶ 61,098, at 61,259 (2000).)

² CAISO Filing at Attachment A at Second Revised Sheet No. 494 and Original Sheet No. 978A.

SCE's proposed change is highlighted by its second proposed correction to the example in EIRP 5.3.2. SCE properly notes that the reference in that example to "60 MW" should be changed to "40 MW." The CAISO agrees to make these corrections in a compliance filing.

SMUD notes that the new Tariff language in Appendix F, Schedule 4, governing the proposed Participating Intermittent Resources Export Fee uses the phrase:

"Participating Intermittent Resource Program settlement costs." SMUD expresses concern that this phrase could be viewed as too vague and proposes that the Tariff language include a narrative explanation that such "settlement costs" refer to all of the CAISO costs which PIRP participants will *avoid* as a result of being in PIRP. The CAISO does not oppose such a clarification with the addition of the bolded language as follows:

A Participating Intermittent Resources Export Fee shall be assessed to Exporting Participating Intermittent Resources each calendar quarter. The Participating Intermittent Resources Export Fee shall be calculated as the product of (1) the sum of all Participating Intermittent Resource Program settlement costs (**such settlement costs referring to all of the CAISO settlement costs which Participating Intermittent Resource Program participants will avoid as a result of being in the program**) for the preceding *calendar quarter*, or portion thereof, excluding charges for Uninstructed Energy associated with Charge Type 4407, (2) by the ratio of the total MW/h generated by an Exporting Participating Intermittent Resource during the calendar quarter, or portion thereof (based on metered output), by the total MW/h generated by all Participating Intermittent Resources during the calendar quarter, or portion thereof (based on metered output), and (3) by the percentage of the Exporting Participating Intermittent Resource's capacity deemed exporting under EIRP 5.3 or Export Percentage.

The CAISO is prepared to make this clarification in a compliance filing.

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With the foregoing changes, the CAISO requests that the Commission accept the proposed amendments to the ISO Tariff submitted in this proceeding.

/s/ Grant Rosenblum
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CERTIFICATE OF SERVICE

I hereby certify that I have, this 6th day of December 2006, served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

/s/ Grant Rosenblum
Grant Rosenblum