

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

**California Independent System)
Operator Corporation)** **Docket No. ER99-3301-003**

**ANSWER OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION TO COMMENTS OF
THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA**

On June 18, 1999, the California Independent System Operator Corporation (“ISO”) filed Amendment No. 18 to the ISO Tariff.¹ Amendment No. 18 modified the ISO Tariff to expand the market from which the ISO may select resources for Intra-Zonal Congestion Management in real time. A number of parties submitted motions to intervene, comments, and/or protests to Amendment No. 18. On July 9, 1999, the ISO submitted its Answer to Motions to Intervene, Comments and Protests. On July 30, 1999, the Commission issued an order accepting Amendment No. 18 with modifications and directing the ISO to submit a compliance filing. *California Independent System Operator Corporation*, 88 FERC ¶ 61,146 (1999). The ISO submitted a compliance filing on August 13, 1999. On October 15, 1999, the Commission issued an order accepting the ISO’s compliance filing, subject to certain modifications to the ISO

¹ Capitalized terms not otherwise defined herein are used in the sense given in the Master Definitions Supplement, Appendix A to the ISO Tariff.

Tariff. *California Independent System Operator Corporation*, 89 FERC ¶ 61,048 (1999) (“October 15 Order”).

Pursuant to the October 15 Order, the ISO filed Tariff sheets revising Section 7.2.6.2 on November 15, 1999 (“November 15 Compliance Filing”). The only responsive filing from any participant concerning the revised Tariff sheets was the Comments of the Metropolitan Water District of Southern California (“MWD Comments”). MWD “generally agrees” that the ISO’s proposed Tariff changes, contained in the November 15 Compliance Filing, comply with the October 15 Order, but MWD goes on to propose “some additional changes . . . for improved clarity and consistency.” MWD Comments at 2. MWD states that whether the Commission should adopt one of its suggested changes turns in part on whether the Commission accepts the ISO’s Amendment No. 23. *Id.* at 3.

MWD’s concerns go beyond the scope of the Amendment No. 18 docket. They are interwoven with issues concerning Amendment No. 23. Therefore, the Commission can adequately address the MWD Comments only in the setting of the Amendment No. 23 docket (Docket No. ER00-555). *See California Independent System Operator Corp.*, 84 FERC ¶ 61,234, at 62,197 (1998) (finding that issues raised were beyond the scope of the filing at hand and instead “reside[d] in other docketed proceedings”); *cf. El Paso Electric Co.*, 89 FERC ¶ 61,181, slip op. at 4 (1999) (finding that compliance filings “must be limited to the specific directives in the Commission’s order”). The Commission should accordingly accept the instant compliance filing without prejudice to MWD’s ability to pursue its issue in Docket No. ER00-555.

For the foregoing reasons, the Commission should permit the ISO to defer discussion of the MWD Comments until appropriate in the Amendment No. 23 docket.

Respectfully submitted,

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