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June 15, 2007

VIA ELECTRONIC FILING

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: California Independent System Operator Corporation
Docket No. ER07-923-000

Dear Secretary Bose:

Attached please find the Answer of the California Independent System Operator Corporation to Motions to Intervene and Request for Clarification, submitted today in the captioned docket.

Please contact the undersigned with any questions regarding this matter.

Respectfully submitted,

/s/ Bradley R. Miliauskas

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

**California Independent System) Docket No. ER07-923-000
Operator Corporation)**

**ANSWER OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION TO MOTIONS TO INTERVENE AND
REQUEST FOR CLARIFICATION**

On May 18, 2007, the California Independent System Operator Corporation (“CAISO”) submitted a filing (“Filing”) in the captioned proceeding that (i) contained an executed Metered Subsystem (“MSS”) Agreement between the CAISO and the City of Riverside (“Riverside”), (ii) provided notice to the Commission of the termination of the existing Utility Distribution Company Operating Agreement (“UDCOA”) between the CAISO and Riverside, and (iii) provided notification to the Commission of the termination of the existing Meter Service Agreement for ISO Metered Entities (“MSA-ISOME”) between the CAISO and Riverside. The Commission established a June 7, 2007, comment date for the CAISO’s Filing, and in response several parties submitted motions to intervene.¹ In addition, Riverside submitted a request for clarification.

The CAISO does not oppose any of the motions to intervene submitted in this proceeding. However, pursuant to Rule 213 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.213 (2006), the CAISO files its answer to Riverside’s request for clarification.

¹ Motions to intervene were submitted by the Northern California Power Agency, Riverside, and Southern California Edison Company.

I. ANSWER

Riverside states that it seems apparent from the CAISO's Filing that the CAISO seeks termination of the UDCOA as of the proposed effective date of the MSS Agreement and date of termination of the MSA-ISOME, *i.e.*, July 1, 2007. However, Riverside also states that the CAISO's request for waiver of the Commission's 60-day prior notice requirement in Section IV of the transmittal letter for the Filing creates some ambiguity, in that Section IV does not refer to the UDCOA. Riverside requests that the Commission clarify that the UDCOA and the MSA-ISOME will terminate on the effective date of the MSS Agreement.

To assist the Commission with regard to the requested clarification, the CAISO states that it does indeed seek termination of the UDCOA as of the proposed effective date for the MSS Agreement (July 1, 2007), as indicated by the portions of the Filing that Riverside references – the first paragraph of the transmittal letter for the Filing and the notice of termination of the UDCOA contained in Attachment B to the Filing. Because the CAISO submitted the Filing fewer than 60 days before the requested effective date, it follows that the CAISO also seeks waiver of the 60-day prior notice requirement in order to permit the UDCOA to terminate as of July 1. The CAISO inadvertently failed to mention the UDCOA in Section IV of the transmittal letter for the Filing, and regrets any confusion that may have resulted.

II. CONCLUSION

For the reasons explained above, the Commission should accept MSS Agreement effective as of July 1, 2007 and should accept the CAISO's notice of

termination of the UDCOA and notification of termination of the MSA-ISOME
effective as of that same date.

Respectfully submitted,

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Dated: June 15, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties on the official service list for the captioned docket, 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 Folsom, California this 15th day of June, 2007.

/s/ John Anders
John Anders