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June 17, 2008

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. ER08-617-001**

Dear Secretary Bose:

Enclosed please find the Answer of the California Independent System Operator Corporation to Comments, submitted in the above-referenced proceeding.

An extra copy of this filing is also enclosed to be stamped with the date and time of filing and returned to the messenger. Thank you for your assistance in this matter. Please contact the undersigned with any questions.

Respectfully submitted,


Bradley R. Miliauskas
Alston & Bird LLP

Counsel for the California Independent
System Operator Corporation

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

California Independent System) Docket No. ER08-617-001
Operator Corporation)

**ANSWER OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION TO COMMENTS**

On May 16, 2008, the California Independent System Operator Corporation ("ISO") submitted in the above-referenced proceeding a filing ("Compliance Filing") to comply with the Commission order issued in this proceeding on April 29, 2008, 123 FERC ¶ 61,092 (2008) ("April 29 Order"). Pursuant to the directives in the April 29 Order, the Compliance Filing contained the Interconnected Balancing Authority Area Operating Agreement as Amended and Restated ("Amended IBAAOA") between the ISO and the Western Area Power Administration, Desert Southwest Region, including revisions to the Amended IBAAOA that were proposed in comments filed by the Metropolitan Water District of Southern California ("MWD") and approved in the April 29 Order.¹ The Commission established a June 6, 2008, comment date concerning the Compliance Filing; in response, only MWD submitted additional comments. Pursuant to Rule 213 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213, the ISO hereby files its answer to the comments submitted by MWD.

¹ See April 29 Order at P 17.

I. Answer

MWD states that the Amended IBAAOA, as revised in the Compliance Filing, incorporates most of the changes requested by MWD and approved in the April 29 Order.² However, MWD notes that one error appears in Service Schedule 1 to the revised Amended IBAAOA: the line “Transmission Owner: MWD” was incorrectly inserted in the portion of Service Schedule 1 entitled “Gene (MWD) – Parker 230 kV Transmission Line,” instead of being inserted in the portion of Service Schedule 1 entitled “Camino – Mead 230 kV East and West Transmission Lines” as required by the April 29 Order.³ The ISO agrees with MWD that it mistakenly inserted the line “Transmission Owner: MWD” in the incorrect portion of Service Schedule 1 to the revised Amended IBAAOA contained in the Compliance Filing. In order to be fully in compliance with the April 29 Order, the ISO provides in Attachment 1 to the instant filing a clean rate schedule sheet (Sheet No. 20) that corrects the above-described error in Service Schedule 1, and provides in Attachment 2 to the instant filing a page showing the correction of that error in black-line format. Please replace the version of Sheet No. 20 contained in Attachment A to the Compliance Filing with the version of Sheet No. 20 contained in Attachment 1 to the instant filing.

MWD states that it does not object to the ISO’s request in the Compliance Filing for confidential treatment concerning Schedules 3 and 12 to the revised Amended IBAAOA, but MWD does ask that the ISO provide it with the

² MWD at 1-2.

³ *Id.* at 2.

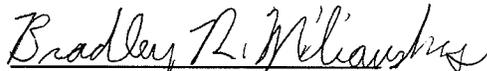
confidential information contained in those Service Schedules as necessary in order to permit the coordination among the Transmission Owners as permitted under the revised Amended IBAAOA.⁴ The ISO will give the confidential information contained in the Service Schedules to MWD provided that MWD agrees to keep the information confidential.

II. Conclusion

For the reasons explained above, the Commission should accept the revised Amended IBAAOA as filed, except as discussed above.

Respectfully submitted,

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Dated: June 17, 2008

⁴ *Id.*

ATTACHMENT 1

SERVICE SCHEDULE 1

INTERCONNECTION

[Subsection 2.2.3]

The Interconnection between the ISO and WALC is comprised of six (6) Interconnections comprised of five (5) 230 kV Interconnections, four (4) at the Mead Substation, and one (1) at the Gene 230 kV Switchyard and one (1) 161 kV Interconnection at Blythe Substation. The Interconnections are with the following Transmission Owners.

With SCE:

Eldorado - Mead 230 kV Transmission Line Nos. 1 and 2 (WECC Path 58):

The Eldorado - Mead 230 kV Transmission Lines connect SCE's Eldorado Substation to the WALC Mead Substation.

ISO Terminal: Mead Substation

Participating Transmission Owner: SCE

WALC Terminal: Mead Substation

Point of Interconnection: Mead Substation

Blythe 161 kV Substation:

The Blythe 161 kV Substation connects SCE's Blythe 161 kV bus to WALC's Blythe 161 kV bus (WECC Path 59).

ISO Terminal: SCE Blythe 161 kV bus

Participating Transmission Owner: SCE

WALC Terminal: Blythe 161 kV bus

Point of Interconnection: WALC Blythe 161 kV Substation

With The Metropolitan Water District (MWD):

Camino - Mead 230 kV East and West Transmission Lines:

Connects MWD's Camino Substation to WALC's Mead Substation.

ISO Terminal: Mead Substation

Participating Transmission Owner: SCE

Transmission Owner: MWD

WALC Terminal: Mead Substation

Point of Interconnection: Mead Substation

Gene (MWD) - Parker 230 kV Transmission Line:

Connects MWD's Gene Pumping Plant to WALC's Parker Generating Plant.

ISO Terminal: Gene 230 kV Switchyard

Participating Transmission Owner: SCE

WALC Terminal: Parker Generating Station

Point of Interconnection: Gene 230 kV Switchyard

Issued by: Anjali Sheffrin, Ph.D., Chief Economist

Issued on: June 17, 2008

Effective: April 30, 2008

Western Contract No. 99-DSR-11066

ATTACHMENT 2

SERVICE SCHEDULE 1

INTERCONNECTION

[Subsection 2.2.3]

The Interconnection between the ISO and WALC is comprised of six (6) Interconnections comprised of five (5) 230 kV Interconnections, four (4) at the Mead Substation, and one (1) at the Gene 230 kV Switchyard and one (1) 161 kV Interconnection at Blythe Substation. The Interconnections are with the following Transmission Owners.

With SCE:

Eldorado - Mead 230 kV Transmission Line Nos. 1 and 2 (WECC Path 58):

The Eldorado - Mead 230 kV Transmission Lines connect SCE's Eldorado Substation to the WALC Mead Substation.

ISO Terminal: Mead Substation

Participating Transmission Owner: SCE

WALC Terminal: Mead Substation

Point of Interconnection: Mead Substation

Blythe 161 kV Substation:

The Blythe 161 kV Substation connects SCE's Blythe 161 kV bus to WALC's Blythe 161 kV bus (WECC Path 59).

ISO Terminal: SCE Blythe 161 kV bus

Participating Transmission Owner: SCE

WALC Terminal: Blythe 161 kV bus

Point of Interconnection: WALC Blythe 161 kV Substation

With The Metropolitan Water District (MWD):

Camino - Mead 230 kV East and West Transmission Lines:

Connects MWD's Camino Substation to WALC's Mead Substation.

ISO Terminal: Mead Substation

Participating Transmission Owner: SCE

Transmission Owner: MWD

WALC Terminal: Mead Substation

Point of Interconnection: Mead Substation

Gene (MWD) - Parker 230 kV Transmission Line:

Connects MWD's Gene Pumping Plant to WALC's Parker Generating Plant.

ISO Terminal: Gene 230 kV Switchyard

Participating Transmission Owner: SCE

Transmission Owner: MWD

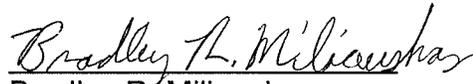
WALC Terminal: Parker Generating Station

Point of Interconnection: Gene 230 kV Switchyard

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the above-referenced proceeding, 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 Washington, D.C. this 17th day of June, 2008.


Bradley R. Miliauskas