

December 22, 1999

The Honorable David P. Boergers
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: San Diego Gas & Electric Company, Docket No. ER98-496-006 and ER98-2160-004

Dear Secretary Boergers:

Enclosed for filing are an original and seven copies of the Summaries of the Initial Testimony, as well as, the Initial Testimony of Brian Theaker and Eric Hildebrandt. in the above-identified dockets. Also, enclosed please find an original and fourteen copies of a letter to the Presiding Judge regarding the issues in this proceeding. Two copies of each document are being provided to Judge Grossman.

Also enclosed are two extra copies of the filing. Please stamp the additional copies with the date and time, and return it to the messenger. Thank you for your assistance.

Respectfully submitted,

Edward Berlin
J. Phillip Jordan
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W.
Washington D.C. 20007

Counsel for the California
Independent System Operator

Enclosures

cc: The Honorable Herbert Grossman
Restricted Service List

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing documents upon each person designated on the Restricted Service List compiled by the Presiding Judge in this proceeding.

Dated at Washington, D.C. on this 22nd day of December, 1999.

Edward Berlin
J. Phillip Jordan
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W.
Washington, D.C. 20007

Counsel for the California
Independent System Operator