

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

<b>California Independent System Operator Corporation</b>	)	<b>Docket Nos.</b>	<b>ER02-250-000</b>
	)		<b>ER02-527-000</b>
	)		
<b>Pacific Gas and Electric Company</b>	)	<b>Docket No.</b>	<b>ER02-479-000</b>
	)		

**MOTION TO SHORTEN COMMENT PERIOD**

Pursuant to Rules 212 and 602(f)(2) of the Commission Rules of Practice and Procedure, 18 C.F.R. § 385.212 and 602(f)(2)(2002), the California Independent System Operator Corporation (“ISO”) respectfully requests on behalf of Sponsoring Parties<sup>1</sup> that the time for comments in response to the concurrently filed Offer of Settlement and Settlement Agreement (“Settlement Agreement”) be reduced from 20 to 11 days, and that the time for reply comments be reduced from 10 to 5 days. The ISO requests the shortened period for the reasons stated below.

The parties making this filing believe and wish to emphasize that the implementation of the Settlement Agreement at the soonest possible date is important to the interests of all participants in the ISO’s markets and that expedited consideration is, therefore, consistent with the public interest. The rates proposed by the Settlement Agreement have already been put in place as interim rates by the Commission beginning September 1, 2002, and a motion for the adjustment of November and December rates for one service category was submitted on October 11, 2002 and is currently pending before

the Commission. Lower rates from January 1, 2002 for two of the GMC categories have not, however, been made effective, and California consumers are not yet receiving the full benefits of the negotiated rates in the Settlement Agreement.

The parties to the referenced proceedings have been engaged in the settlement negotiations that led to the submission of the Settlement Agreement for more than four months beginning at the direction of the Presiding Administrative Law Judge after the May 30, 2002 pre-hearing conference. All settlement conference calls have been noticed to parties using an electronic distribution list and all drafts of the settlement documents have been circulated using the same list. This process ensured that all affected parties would be given the opportunity to participate in the negotiation of this agreement. Every component of this submission – the words and phrases used to express the intentions of the parties – has been reviewed, edited and revised in numerous drafting sessions to reflect the agreement of affected parties. Therefore, the ISO respectfully suggests that shortening of the time for answers would prejudice no party. Given the consumer benefits to be derived from the acceptance of this Settlement Agreement and the opportunity for full participation of interested parties in the negotiations leading to this Settlement Agreement, the Parties are requesting that the period for initial comments on the Settlement Agreement be 11 days and that the period for reply comments be 5 days.

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<sup>1</sup> Sponsoring Parties are: The California Independent System Operator Corporation, Pacific Gas and Electric Company and Southern California Edison Company.

WHEREFORE, the Sponsoring Parties respectfully request that the time for comments on the Settlement Agreement be shortened from 20 to 11 days and that the time for reply comments be shortened from 10 to 5 days.

Respectfully submitted,

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