

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

California Independent System Operator Corporation	) ) )	Docket Nos. ER01-313-000 ER01-313-001
Pacific Gas and Electric Company	) )	Docket Nos. ER01-424-000 ER01-424-001

**MOTION OF THE CALIFORNIA  
INDEPENDENT SYSTEM OPERATOR  
CORPORATION TO SUBSTITUTE WITNESS**

To: The Honorable Bobbie J. McCartney  
Presiding Administrative Law Judge

Pursuant to Rule 212 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212, 2000, the California Independent System Operator Corporation ("ISO") respectfully moves for leave to permit A. Deane Lyon to adopt the Direct Testimony of Trent A. Carlson (Exh. No. ISO-10) and to sponsor that testimony and its supporting exhibit (Exh. No. ISO-11) for cross-examination. Mr. Carlson's Direct Testimony is appended hereto as Attachment A for ease of reference.

Mr. Carlson is no longer employed by the ISO, and is unavailable to appear at the hearing. Mr. Lyon has submitted Rebuttal Testimony in this proceeding (Exh. No. ISO-29), and is prepared to sponsor both his own Rebuttal Testimony and Mr. Carlson's Direct Testimony for cross-examination at the hearing.

Wherefore, the ISO respectfully requests that the Presiding Judge permit A. Dean Lyon to adopt the Direct Testimony of Trent A. Carlson and to sponsor Exh. No. ISO-10 and its supporting exhibit, Exh. No. ISO-11.

Respectfully submitted,

Charles Robinson  
General Counsel  
Stephen Morrison  
Regulatory Counsel  
The California Independent  
System Operator Corporation  
151 Blue Ravine Road  
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3000 K Street, N.W.  
Suite 300  
Washington, DC 20007

Dated: November 9, 2001

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served the foregoing document upon all parties on the official service list compiled by the Secretary in the above-captioned 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, DC this 9<sup>th</sup> day of November, 2001.

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Julia Moore  
(202) 295-8357

November 9, 2001

The Honorable David P. Boergers  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

**Re: *California Independent System Operator Corporation,*  
Docket Nos. ER01-313-000 and ER01-313-001**

***Pacific Gas and Electric Company*  
Docket Nos. ER01-424-000 and ER01-424-001**

Dear Secretary Boergers:

Enclosed for filing are one original and 14 copies of the Unopposed Motion of the California Independent System Operator Corporation to Substitute Witness in the above-referenced proceeding. Two courtesy copies of this filing have been provided to Judge Bobbie J. McCartney. Two additional copies of the filing are also enclosed. Please stamp the two additional copies with the date and time filed and return them to the messenger.

Thank you for your assistance in this matter.

Respectfully submitted,

Julia Moore  
(202) 424-7500

Attorney for the California Independent  
System Operator Corporation

CC: The Honorable Bobbie J. McCartney  
Service List