

Refund proceeding (“Reliant Template Motion”). Because the issue of emissions costs calculation has been open for some time, the ISO submits that no party will be prejudiced by the Commission accepting this answer two days out of time.

The ISO does not oppose the adoption of a common template for emissions costs. Indeed, the ISO very much supports the adoption of procedures that will expedite the resolution of the issue of the correct emissions costs for those parties for which the Commission has approved offsets. The ISO wishes to reiterate, however, that it does not have the requisite expertise or available resources to be responsible for overseeing the calculation of emissions offset costs.² This includes the formulation of an appropriate template for those costs. In fact, the ISO has stated previously that all it needs from a pure calculation perspective is a final number for emissions allowances approved by the Commission applicable to mitigated intervals.³ This final figure will allow the ISO to allocate emissions costs “to load-serving entities based on ISO Gross Control Area Load,” pursuant to the Commission’s March 26, 2003 order in these proceedings.⁴ It is for these reasons that the ISO is not in a position to opine as to whether or not the template proposed by Reliant is satisfactory.

² *Answer of the California Independent System Operator To California Parties’ Motion To Strike the City of Pasadena, California’s “Allocation Of Out-Of-Pocket Costs To Purchase Emissions Credits” and Comments on the Answers of Pasadena and the Los Angeles Department of Water and Power*, filed in Docket Nos. EL00-95-045, *et al.* (April 13, 2004) at 5-6.

³ *Status Report of the California Independent System Operator Corporation on Emissions Offsets and Fuel Cost Allowance*, filed in Docket Nos. EL00-95-081, *et al.* (May 24, 2004) at 4.

⁴ 102 FERC ¶ 61,317 (2004) at P 122.

CONCLUSION

WHEREFORE, the ISO requests that the Commission accept this answer, filed two days out of time, in response to the Reliant Template Motion.

Respectfully submitted,

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July 15, 2005

Certificate of Service

I hereby certify that I have this day served a copy of this document upon all parties listed on the official service list compiled by the Secretary in the above-captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated this 15th day of July, 2005 at Folsom in the State of California.

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