

**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

**RESPONSE OF THE CALIFORNIA INDEPENDENT  
SYSTEM OPERATOR CORPORATION TO MOTION OF PACIFIC  
GAS AND ELECTRIC COMPANY TO AMEND THE PROCEDURAL  
SCHEDULE AND TO SUBMIT SUPPLEMENTAL TESTIMONY**

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

Pursuant to Rule 213 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213, the California Independent System Operator Corporation ("ISO") files this Response to the Motion to Amend the Procedural Schedule and to Submit Supplemental Testimony ("Motion") of Pacific Gas and Electric Company ("PG&E")

**I. Background**

On July 5, 2001, PG&E filed the Motion in the above-captioned dockets. The purpose of the Motion is to allow PG&E to submit Supplemental Testimony and cost-of-service data that Commission Trial Staff witness Stephen D. Pointer argues is needed to support PG&E's Grid Management Charge pass-through filing. See Prepared Written Direct Testimony of Stephen D. Pointer, Exhibit No. Ex. S-6. PG&E requested a delay in the procedural schedule to allow for its Supplemental Testimony to be filed, for other parties to have the opportunity to respond to it, and for PG&E to file rebuttal Testimony

regarding any such response. PG&E suggested that the delay in the start of the hearing need not be very long to accommodate its Supplemental Testimony, and suggested the hearing could commence “shortly” after October 5. Motion at 5. PG&E did not propose a specific hearing date, but expressed a willingness “to work collaboratively with the Trial Staff, intervenors, and the Presiding Judge to establish other dates if and when this Motion is granted.” *Id.* PG&E requested the Presiding Judge to require that responses to the Motion be due within 7 days, or July 12, 2001.

## **II. ISO Response**

The ISO does not object to PG&E filing Supplemental Testimony or cost-of-service data. If the procedural schedule is to be altered, however, the ISO requests that the new hearing date be no earlier than November 13, 2001. Due to the press of other business, and to personal plans made by persons involved in the hearing based on the existing hearing schedule, a date later than October 16 and earlier than November 13 would be extremely difficult for the ISO.

### III. Conclusion

Wherefore, the ISO requests that the Presiding Judge establish a new hearing date, if any, no earlier than November 13, 2001.

Respectfully submitted,

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Date July 12, 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 12<sup>th</sup> day of July, 2001.

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Julia Moore  
(202) 295-8357

July 12, 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. ER01-424-00 and ER01-424-001**

Dear Secretary Boergers:

Enclosed for filing are one original and 14 copies of the Response of the California Independent System Operator to the Motion of Pacific Gas and Electric Company to Amend the Procedural Schedule and Submit Supplemental Testimony in the above-referenced proceeding. Two courtesy copies of this pleading have been provided to Presiding Administrative Law 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) 295-8357

Attorney for the California Independent  
System Operator Corporation

CC: The Honorable Bobbie J. McCartney  
Service List