

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Pat Wood, III, Chairman;
Nora Mead Brownell, Joseph T. Kelliher,
and Suedeem G. Kelly.

California Independent System Operator Corporation	Docket Nos. ER04-445-000 ER04-445-001 ER04-445-002 ER04-445-003
Pacific Gas and Electric Company	Docket Nos. ER04-443-000 ER04-443-001 ER04-443-002
San Diego Gas and Electric Company	Docket Nos. ER04-441-000 ER04-441-001 ER04-441-002
Southern California Edison Company	Docket Nos. ER04-435-000 ER04-435-001 ER04-435-003

(Not Consolidated)

ORDER REJECTING ORDER NOS. 2003 AND 2003-A COMPLIANCE FILINGS

(Issued July 30, 2004)

1. In this order, the Commission rejects the California Independent System Operator Corporation's (CAISO) proposed revisions to the *pro forma* Large Generator Interconnection Procedures (LGIP) and Interconnection Study Agreements (study agreements) filed in compliance with Order Nos. 2003 and 2003-A¹. In addition, the

¹ Standardization of Generator Interconnection Agreements and Procedures, Order No. 2003, 68 Fed. Reg. 49,845 (Aug. 19, 2003), FERC Stats. & Regs., Regulations Preambles ¶ 31,146 (2003) (Order No. 2003), *order on reh'g*, Order No. 2003-A, 69 Fed. Reg. 15,932 (2004) (Order No. 2003-A), *reh'g pending*; *See also* Notice (continued)

Commission rejects the Large Generator Interconnection Agreement (LGIA) jointly filed by CAISO and three Participating Transmission Owners (PTOs)² - Southern California Edison Company (SoCal Edison), Pacific Gas and Electric Company (PG&E) and San Diego Gas & Electric Company (SDG&E) (collectively, CAISO and these PTOs are the Filing Parties) - also in compliance with Order No. 2003 and 2003-A. Lastly, the Commission defers action on the conforming TO Tariff filings submitted by the PTOs. This action benefits CAISO customers because it ensures that the rates, terms, and conditions for interconnection service are just and reasonable and thus encourages more competitive markets.

I. Background

Order No. 2003

2. In Order No. 2003, pursuant to its responsibility under sections 205 and 206 of the Federal Power Act (FPA)³ to remedy undue discrimination, the Commission required all public utilities that own, control, or operate facilities for transmitting electric energy in interstate commerce to append to their open access transmission tariffs (OATTs) the *pro forma* LGIP and *pro forma* LGIA. In order to achieve greater standardization of interconnection terms and conditions, Order No. 2003 required such public utilities to file revised OATTs containing the *pro forma* LGIP and LGIA by January 20, 2004.⁴

3. On January 20, 2004, CAISO filed its proposed LGIP, related *pro forma* Interconnection Study agreements (not to be a part of the CAISO Tariff) and related ISO Tariff amendments pursuant to Order No. 2003, and committed to submit their proposed LGIA within 20 days of the filing of the LGIP.⁵

Clarifying Compliance Procedures, 106 FERC ¶ 61,009 (2004).

² A PTO is a California entity subject to the jurisdiction of the Commission which has placed its transmission assets and Entitlements under CAISO's Operational Control. (See Master Definitions Supplement of the CAISO OATT.) PG&E, SoCal Edison and SDG&E are the PTOs that have been active in this LGIP/LGIA process.

³ 16 U.S.C. §§824d, 824e (2000).

⁴ See Notice Clarifying Compliance Procedures, *supra* note 1.

⁵ CAISO's filing contains the substantive provisions governing interconnection of large generators to the CAISO-controlled grid, including the jurisdictional facilities of SoCal Edison, PG&E, and SDG&E.

4. Also on January 20, 2004, SoCal Edison (in Docket No. ER04-435-000), PG&E (in Docket No. ER04-443-000), and SDG&E (in Docket No. ER04-441-000) filed conforming Transmission Owner (TO) Tariff compliance filings to reflect CAISO's LGIP filing. PG&E stated that CAISO's filing (in Docket No. ER04-445-000) "contains all the substantive provisions governing interconnection of large generators to the ISO-controlled grid," and that PG&E, along with SoCal Edison and SDG&E, were, in turn, filing conforming changes to their respective TO Tariffs.⁶

5. On February 9, 2004, the Filing Parties jointly filed (in Docket Nos. ER04-445-001, ER04-435-001, ER04-443-001 and ER04-441-001) proposed revisions to the *pro forma* LGIA (Joint LGIA). CAISO proposes certain variations to the *pro forma* LGIP and LGIA based on CAISO operating requirements, and pursuant to the flexibility provided to independent Transmission Providers⁷ by the Commission in Order No. 2003.⁸ CAISO's specific proposed variations to the *pro forma* LGIP and LGIA are discussed below.

Order No. 2003-A

6. On March 5, 2004, the Commission issued its Order on Rehearing of Order No. 2003. While the legal and policy conclusions that formed the basis of Order No. 2003 were reaffirmed, in response to various rehearing requests, the Commission modified a number of the provisions of Order No. 2003's *pro forma* LGIP and LGIA.

7. After the issuance of Order No. 2003-A, the Filing Parties worked to address the extent to which changes to their compliance filings were necessary and/or desirable as a result. On April 26, 2004, CAISO submitted its LGIP compliance filing (in Docket No. ER04-445-002), revised in accordance with Order No. 2003-A, for Commission

⁶ PG&E January 20, 2004 Transmittal Letter at 2.

⁷ The "Transmission Provider" is the entity with which the Generating Facility is interconnecting. The term "Generating Facility" means the specific device (having a capacity of more than 20 megawatts) for which the Interconnection Customer has requested interconnection. The owner of the Generating Facility is referred to as the "Interconnection Customer."

⁸ January 20, 2004 CAISO Transmittal Letter at 9-10; February 9, 2004 CAISO Transmittal Letter at 7.

approval. Concurrently, the Filing Parties filed a revised Joint LGIA (in Docket Nos. ER04-445-003, ER04-435-003, ER04-441-002, and ER04-443-002) to reflect both the guidance provided by Order No. 2003-A and certain intervenor comments and protests.

Existing Interconnection Procedures

8. Currently, Interconnection Customers submit applications for interconnection to CAISO, but the Interconnection Customer's interconnection is provided pursuant to both the CAISO and TO Tariffs. CAISO and the interconnecting PTO determine what studies, if any, are necessary. If the Interconnection Customer chooses not to perform its own System Impact or Facilities Study or contract with a third party for same, these two studies, and any additional studies deemed necessary by CAISO, are conducted by the interconnecting PTO. Upon completion of the Facilities Study, the Interconnection Customer may request an interconnection agreement from the interconnecting PTO. If the customer and interconnecting PTO are unable to agree on rates, terms and conditions of the agreement, the interconnecting customer may request the PTO to file the unexecuted agreement with the Commission. However, neither CAISO nor the interconnecting PTO is obligated to energize the interconnection until the agreement is either executed or filed and becomes effective, and the Interconnection Customer has demonstrated compliance with CAISO OATT and TO Tariff interconnection requirements.

II. The Compliance Filings

CAISO Compliance Filing

9. CAISO is the Transmission Provider which exercises operational control over the facilities turned over to CAISO by, among others, the three PTOs subject to the jurisdiction of the Commission (SoCal Edison, PG&E, and SDG&E). CAISO requests acceptance of its LGIP as part of its OATT. CAISO requests acceptance of the study agreements as stand-alone *pro forma* documents, separate from the CAISO OATT, and proposes to post the revised *pro forma* study agreements on the CAISO homepage. In addition, the Filing Parties request acceptance of the Joint LGIA as a stand-alone *pro forma* document, separate from the CAISO OATT and TO Tariffs. The revised LGIA is a three-party agreement among the Interconnection Customer, PTO and CAISO. Therefore, actual LGIAs would be designated as service agreements under both the CAISO OATT and respective TO Tariff. The *pro forma* study agreements are proposed to be standardized across the CAISO Control Area, whereas presently these agreements are PTO-specific.

10. The Filing Parties state that they have each relinquished any unilateral right to modify the revised *pro forma* LGIA, and therefore seek guidance as to the appropriate means for its documentation. The Filing Parties add that it was not logical to include in either the revised *pro forma* LGIA, the CAISO OATT, or the TO Tariff, any reference to their unilateral waivers of section 205 rights for modification. Thus the Filing Parties are asking the Commission to either confirm this particular unilateral waiver, or to guide the Filing Parties regarding the appropriate means to document their agreement. The Filing Parties also ask that the Commission clarify their filing requirements with respect to executed LGIAs that conform to a Commission-approved *pro forma*, but that contain specific costs that the Interconnection Customer is required to pay, and that the Commission may wish to review. The Filing Parties request confirmation that they may simply submit individual rate sheets showing the specific charges applicable to the particular Interconnection Customer.

11. Consistent with the Commission's Notice Clarifying Compliance Procedures, CAISO intends that interconnection agreements currently used in California will remain in effect until its compliance filings are approved. CAISO requests that the Commission set the effective date for the revised LGIP and Joint LGIA prospectively, as substantial disruption to current interconnection efforts could result if the Commission were to establish a retroactive effective date.

PTO Compliance Filings

12. In their respective transmittal letters, SoCal Edison, PG&E, and SDG&E each state that CAISO's Order No. 2003 compliance filings contain all of the substantive provisions governing interconnection of large generators to the CAISO Controlled Grid, including all of their jurisdictional facilities, while each PTO's conforming TO Tariff compliance filing includes strictly ministerial changes.⁹ Thus, the TO tariffs will no longer include any interconnection procedures; rather their tariffs will reference CAISO's tariff.

13. Proposed modifications in each of the TO Tariff filings include revisions to article 3 -- Definitions, article 8 -- Interconnection Obligations, and article 10 -- Interconnection Process. The PTOs request that the Commission accept their TO tariff revisions as effective on the same date as the CAISO Order No. 2003 compliance filing, since the revised service provisions are inextricably linked.

⁹ See, e.g., SoCal Edison January 20, 2004 Transmittal Letter at 2.

Notice of Filing, Interventions, Protests and Answers

14. Notice of CAISO's LGIP compliance filing was published in the *Federal Register*, 69 Fed. Reg. 5,850 (2004), with comments, interventions and protests due on or before February 10, 2004.¹⁰ On February 9, 2004, the Commission issued a Notice of Extension that established February 23, 2004 as the date for comments. Entities that filed motions to intervene in this docket (ER04-445-000) are listed in Appendix A to this order. On March 9, 2004, CAISO submitted an answer to parties' comments and protests in this docket. On that same date, and in the same docket, SDG&E filed an answer to CPUC's and Calpine's comments.

15. Notice of each of the PTOs conforming TO Tariff compliance filing was published in the *Federal Register*, 69 Fed. Reg. 5,849-50 (2004), with comments, interventions and protests due on or before February 10, 2004. On February 9, 2004, the Commission issued a Notice of Extension that established February 23, 2004 as the date for comments. Entities that filed motions to intervene in each of the dockets (ER04-435-000, ER04-441-000 and ER04-443-000) are listed in Appendices B, C, and D, respectively, to this order.¹¹ On April 1, 2004, SoCal Edison submitted an answer (in subdocket ER04-435-002) to the Motion to Intervene and Protest on Behalf of the Cities of Anaheim, Azusa, Banning, Colton, and Riverside, California.

16. Notice of the Order No. 2003 Joint LGIA compliance filing was published in the *Federal Register*, 69 Fed. Reg. 7,745 (2004), with comments, interventions and protests due on or before March 1, 2004. Entities that filed motions to intervene in these dockets (ER04-445-001, ER04-435-001, ER04-441-001, and ER04-443-001) are listed in Attachment E to this order. On March 16, 2004, CAISO and SoCal Edison separately filed answers to parties' comments and protests in this docket.

17. Notice of CAISO's Order No. 2003-A LGIP compliance filing was published in the *Federal Register*, 69 Fed. Reg. 26,584 (2004), with comments, interventions and protests due on or before May 17, 2004. On May 17, 2004, Calpine filed a protest in this docket and PPM Energy filed a notice of intervention and protest.

¹⁰ 18 C.F.R. § 35.3 (2004).

¹¹ Acronyms used for party names throughout this order can also be found in these appendices.

18. Notice of the Filing Parties' Order No. 2003-A Joint LGIA compliance filing was published in the *Federal Register*, 69 Fed. Reg. 26,584 (2004), with comments, interventions and protests due on or before May 17, 2004. On May 17, 2004, Dynegy filed a notice of intervention and Calpine filed a protest in these dockets. On June 1, 2004, CAISO filed an Answer to these pleadings.

III. Commission Determination

Procedural Matters

19. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2004), the timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding. We will also grant the motions to intervene filed out of time, as under Rule 214 they will neither disrupt the proceeding nor prejudice the existing parties.

20. Rule 213(a)(2) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2)(2004), prohibits an answer to a protest or an answer unless otherwise ordered by the decisional authority. We are not persuaded to accept the answers and will, therefore, reject them.

Applicable Standard of Review

21. CAISO seeks approval for its proposed variations from the *pro forma* LGIP and LGIA under our "independent entity variation" standard of review. The PTOs are not proposing to include any interconnection procedures in their respective tariffs.

22. In Order No. 2003, we held that we would allow flexibility for variations from the *pro forma* LGIP and LGIA in those regions where an independent Transmission Provider, *e.g.*, a regional transmission organization (RTO) or independent system operator (ISO), is permitted the flexibility to deviate from the standard LGIP and LGIA requirements to meet their regional needs.¹² In Order No. 2003-A, the Commission continued to recognize the principle enunciated in Order No. 2003 that independent Transmission Providers have the flexibility to tailor the *pro forma* LGIP and LGIA in order to best meet their regional needs, pursuant to the "independent entity variation" standard.¹³ We stated that this treatment would be appropriate because RTOs and ISOs have different operating characteristics than non-independent entities and are less likely to discriminate than a market participant.

¹² *See id.* at P at 26, 28, 32, 34, 92, 698-703 and 822-24.

¹³ Order No. 2003-A at P 41, 48-51.

23. Under Order No. 2003, non-independent Transmission Providers are permitted to propose variations to the *pro forma* LGIP and LGIA if the variations are based on existing regional reliability requirements that are justified through established regional reliability standards.¹⁴ Non-independent Transmission Providers are also permitted to seek variations from the *pro forma* LGIP and LGIA not made in response to recognized regional reliability requirements. Such requests for variation are FPA section 205 filings (rather than compliance filings) and will be approved only if the Transmission Provider demonstrates that they are "consistent with or superior to" the terms of the *pro forma* LGIP and LGIA.¹⁵

24. The Commission previously determined that CAISO's board had failed to meet the independence requirement for ISO status.¹⁶ For that reason, we will reject CAISO's request that its proposed variations be considered under our "independent entity variation" standard. In addition, while CAISO makes a general request that "many" of its changes also meet the "consistent with or superior to" standard,¹⁷ CAISO's request is insufficient to trigger the application of the standard because CAISO has not explained with specificity which variations are "consistent with or superior to" the *pro forma* provisions or how each variation specifically meets the standard. We also defer action on the PTO's individual conforming tariff filings because they were submitted to conform to the very CAISO documents rejected here.

25. Given the unusual procedural position in which CAISO now finds itself, we will not require that the CAISO strictly adhere to the compliance process established for non-independent entities.¹⁸ Therefore, sixty days from the date of this order, the CAISO must submit a compliance filing that adopts the *pro forma* LGIP and LGIA in order to comply with Order Nos. 2003 and 2003-A. In its filing submitted in compliance with this order, the CAISO must justify any proposed variations based on either the "consistent with or superior to" standard or the regional reliability variations standard permitted for non-independent entities. Any proposed regional reliability variation must cite specific

¹⁴ See Order No. 2003 at P 822-824.

¹⁵ See *id.* at P 825.

¹⁶ See Order Concerning Governance of the California Independent System Operator, 100 FERC ¶ 61,059 at P 1-2 (2002).

¹⁷ See, e.g., Joint CAISO-PTO Transmittal Letter, Feb. 9, 2004, at 7.

¹⁸ See Order No. 2003 at 822-27; Notice Clarifying Compliance Procedures, 106 FERC ¶ 61,009 at P 2 (2004)

regional reliability requirements, and explain why the variation is necessary to comply with the reliability requirement. The effective date for CAISO's compliance filing will be sixty days from the date of this order. In the meantime, the existing interconnection procedures and agreements will continue to apply.

The Commission orders:

(A) CAISO's proposed modifications to the *pro forma* LGIP and LGIA are rejected as discussed in the body of this order.

(B) The PTOs' tariff filings are dismissed, as discussed in the body of this order.

(C) CAISO is directed to submit its compliance filing as directed in this order within 60 days.

By the Commission.

(S E A L)

Magalie R. Salas,
Secretary.

APPENDIX A**INTERVENORS IN CAISO DOCKET NO. ER04-445-000**
(LGIP Compliance Filing)

California Department of Water Resources State Water Project (SWP)
California Electricity Oversight Board
Calpine Corporation (Calpine)
Cities of Anaheim, Azusa, Banning, Colton and Riverside, California (Southern Cities)
City of Redding, California, City of Santa Clara, California and the M-S-R Public Power Agency (M-S-R) (collectively, Cities/M-S-R)
City of Vernon, California (Vernon)
Cogeneration Association of California (CAC)¹
Constellation Generation Group, LLC (Constellation)
Duke Energy North America, LLC and Duke Energy Trading and Marketing, LLC (collectively, Duke Energy)
Energy Producers and Users Coalition (EPUC)²
Independent Energy Producers Association (IEPA)
Metropolitan Water District of Southern California (Metropolitan)
Mirant Americas Energy Marketing, LP (MAEM), Mirant California, LLC, Mirant Delta, LLC and Mirant Potrero, LLC (collectively, Mirant)
NRG Power Marketing, Inc. and NEO California Power LLC (collectively, NRG Companies)
Northern California Power Agency (NCPA)
Pacific Gas and Electric Company (PG&E)
PPM Energy, Inc. (PPM Energy)
Public Utilities Commission of the State of California (CPUC)

¹ CAC represents the power generation, power marketing and cogeneration operation interests of the following entities: Coalinga Cogeneration Company, Mid-Set Cogeneration Company, Kern River Cogeneration Company, Sycamore Cogeneration Company, ChevronTexaco Kern Field Projects, Sargent Canyon Cogeneration Company, Salinas River Cogeneration Company, ChevronTexaco North Midway Cogeneration Project, ChevronTexaco McKittrick Cogeneration Project, Midway Sunset Cogeneration Company and Watson Cogeneration Company.

² EPUC is an ad hoc group representing the electric end use and customer generation interests of the following companies: Aera Energy LLC, BP America Inc. (including Atlantic Richfield Company), Chevron U.S.A. Inc., Shell Oil Products US, Exxon Mobil Corporation, THUMS Long Beach Company, Occidental Elk Hills, Inc. and Valero Refining Company – California.

San Diego Gas & Electric Company (SDG&E)
Sempra Energy Resources (SER)
Southern California Edison Company (SoCal Edison)
Tenaska, Inc. (Tenaska)
Transmission Agency of Northern California (TANC)

APPENDIX B

INTERVENORS IN CAISO DOCKET NO. ER04-435-000
(Southern California Edison Company's Transmission Owner Tariff
Compliance Filing)

California Electricity Oversight Board
California Independent System Operator Corporation (CAISO)
Calpine Corporation (Calpine)
Cities of Anaheim, Azusa, Banning, Colton and Riverside, California (Southern Cities)
City of Vernon, California (Vernon)
Cogeneration Association of California (CAC)¹
Constellation Generation Group, LLC (Constellation)
Energy Producers and Users Coalition (EPUC)²
Metropolitan Water District of Southern California (Metropolitan)
Pacific Gas and Electric Company (PG&E)
Public Utilities Commission of the State of California (CPUC)
San Diego Gas & Electric Company (SDG&E)
Semptra Energy Resources (SER)

¹ CAC represents the power generation, power marketing and cogeneration operation interests of the following entities: Coalinga Cogeneration Company, Mid-Set Cogeneration Company, Kern River Cogeneration Company, Sycamore Cogeneration Company, ChevronTexaco Kern Field Projects, Sargent Canyon Cogeneration Company, Salinas River Cogeneration Company, ChevronTexaco North Midway Cogeneration Project, ChevronTexaco McKittrick Cogeneration Project, Midway Sunset Cogeneration Company and Watson Cogeneration Company.

² EPUC is an ad hoc group representing the electric end use and customer generation interests of the following companies: Aera Energy LLC, BP America Inc. (including Atlantic Richfield Company), Chevron U.S.A. Inc., Shell Oil Products US, Exxon Mobil Corporation, THUMS Long Beach Company, Occidental Elk Hills, Inc. and Valero Refining Company – California.

APPENDIX C

INTERVENORS IN CAISO DOCKET NO. ER04-441-000
(San Diego Gas & Electric Company's Transmission Owner Tariff
Compliance Filing)

California Electricity Oversight Board
California Independent System Operator Corporation (CAISO)
Calpine Corporation (Calpine)
Cities of Anaheim, Azusa, Banning, Colton and Riverside, California (Southern
Cities)
City of Vernon, California (Vernon)
Cogeneration Association of California (CAC)¹
Energy Producers and Users Coalition (EPUC)²
Pacific Gas and Electric Company (PG&E)

¹ CAC represents the power generation, power marketing and cogeneration operation interests of the following entities: Coalinga Cogeneration Company, Mid-Set Cogeneration Company, Kern River Cogeneration Company, Sycamore Cogeneration Company, ChevronTexaco Kern Field Projects, Sargent Canyon Cogeneration Company, Salinas River Cogeneration Company, ChevronTexaco North Midway Cogeneration Project, ChevronTexaco McKittrick Cogeneration Project, Midway Sunset Cogeneration Company and Watson Cogeneration Company.

² EPUC is an ad hoc group representing the electric end use and customer generation interests of the following companies: Aera Energy LLC, BP America Inc. (including Atlantic Richfield Company), Chevron U.S.A. Inc., Shell Oil Products US, Exxon Mobil Corporation, THUMS Long Beach Company, Occidental Elk Hills, Inc. and Valero Refining Company – California.

APPENDIX D

INTERVENORS IN CAISO DOCKET NO. ER04-443-000
(Pacific Gas & Electric Company's Transmission Owner Tariff Compliance
Filing)

California Electricity Oversight Board
California Independent System Operator Corporation (CAISO)
Calpine Corporation (Calpine)
Cities of Anaheim, Azusa, Banning, Colton and Riverside, California (Southern Cities)
City of Redding, California, City of Santa Clara, California
City of Vernon, California (Vernon)
Cogeneration Association of California (CAC)¹
Energy Producers and Users Coalition (EPUC)²
Metropolitan Water District of Southern California (Metropolitan)
Northern California Power Agency (NCPA)
Public Utilities Commission of the State of California (CPUC)
San Diego Gas & Electric Company (SDG&E)
Sempra Energy Resources (SER)
Transmission Agency of Northern California (TANC)

¹ CAC represents the power generation, power marketing and cogeneration operation interests of the following entities: Coalinga Cogeneration Company, Mid-Set Cogeneration Company, Kern River Cogeneration Company, Sycamore Cogeneration Company, ChevronTexaco Kern Field Projects, Sargent Canyon Cogeneration Company, Salinas River Cogeneration Company, ChevronTexaco North Midway Cogeneration Project, ChevronTexaco McKittrick Cogeneration Project, Midway Sunset Cogeneration Company and Watson Cogeneration Company.

² EPUC is an ad hoc group representing the electric end use and customer generation interests of the following companies: Aera Energy LLC, BP America Inc. (including Atlantic Richfield Company), Chevron U.S.A. Inc., Shell Oil Products US, Exxon Mobil Corporation, THUMS Long Beach Company, Occidental Elk Hills, Inc. and Valero Refining Company – California.

APPENDIX E

**INTERVENORS IN CAISO DOCKET NOS.
ER04-445-001, ER04-435-001, ER04-441-001, and ER04-443-001
(Joint LGIA Compliance Filing)**

California Department of Water Resources State Water Project (SWP)
California Public Utilities Commission (CPUC)
California Electricity Oversight Board
Calpine Corporation (Calpine)
City of Vernon, California (Vernon)
Cogeneration Association of California (CAC)¹
Duke Energy North America, LLC and Duke Energy Trading and Marketing, LLC
(collectively, Duke Energy)
Mirant Americas Energy Marketing, LP (MAEM), Mirant California, LLC, Mirant
Delta, LLC and Mirant Potrero, LLC (collectively, Mirant)
Northern California Power Agency (NCPA)
Reliant Energy Services Inc.
Southern California Edison Company (SoCal Edison)
Transmission Agency of Northern California (TANC)

¹ CAC represents the power generation, power marketing and cogeneration operation interests of the following entities: Coalinga Cogeneration Company, Mid-Set Cogeneration Company, Kern River Cogeneration Company, Sycamore Cogeneration Company, ChevronTexaco Kern Field Projects, Sargent Canyon Cogeneration Company, Salinas River Cogeneration Company, ChevronTexaco North Midway Cogeneration Project, ChevronTexaco McKittrick Cogeneration Project, Midway Sunset Cogeneration Company and Watson Cogeneration Company.