

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

California Independent System Operator Corporation)	Docket Nos.	EC96-19-029 and ER96-1663-030
California Independent System Operator Corporation)	Docket Nos.	ER98-1971-001
California Independent System Operator Corporation)	Docket Nos.	ER98-990-001
California Independent System Operator Corporation)	Docket Nos.	ER98-1019-001
California Independent System Operator Corporation)	Docket Nos.	ER98-1499-001
California Independent System Operator Corporation)	Docket Nos.	ER98-992-001
California Independent System Operator Corporation)	Docket Nos.	ER98-1057-001
California Independent System Operator Corporation)	Docket Nos.	ER98-899-001

(Not Consolidated)

**MOTION OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION
FOR EXTENSION OF TIME TO FILE ANSWER**

Pursuant to Rule 212 and 213 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (the "Commission"), 18 C.F.R. § 385.212 and 385.213 (1997), the California Independent System Operator Corporation ("ISO") respectfully moves the Commission to extend until September 3, 1998, the time permitted for the ISO to answer the pleadings filed in response to the Commission's June 9, 1998, Notice of Filing in these proceedings.

BACKGROUND

These dockets concern the ISO's June 1, 1998, Compliance Filing regarding the ISO Tariff, Protocols, and other agreements which the ISO made 60 days after the commencement of ISO operations, pursuant to a number of Commission Orders, including the Commission's December 17, 1997, Order in Docket Nos. EC96-19-008, et al., 81 FERC ¶ 61,320.¹ In its June 9, 1998, Notice of Filing regarding these proceedings, the Commission provided an extended period for filing interventions and protests, establishing an August 5, 1998, deadline for such pleadings. The Notice of Filing, consistent with the Commission's previously stated intention in its December 17, 1998, Order, also provided for inclusion of pleadings other than interventions and protests, in which the Commission invited parties to raise "issues . . . not yet addressed by the Commission."²

¹ In addition to the December 17, 1997, Order, the Compliance Filing responded to the following Orders: Pacific Gas and Electric, et al., 81 FERC ¶ 61,122 (1997); California Independent System Operator Corporation, 82 FERC ¶ 61,174 (1998); California Independent System Operator Corporation, 82 FERC ¶ 61,180 (1998); California Independent System Operator Corporation, 82 FERC ¶ 61,252 (1998); California Independent System Operator Corporation, 82 FERC ¶ 61,312 (1998); California Independent System Operator Corporation, 82 FERC ¶ 61,325 (1998); California Independent System Operator Corporation, 82 FERC ¶ 61,326 (1998); California Independent System Operator Corporation, 82 FERC ¶ 61,327 (1998); California Independent System Operator Corporation, Docket Nos. ER98-2263-000 and ER98-2264-000 (April 21, 1998); California Independent System Operator Corporation, 83 FERC ¶ 61,118 (1998) and California Independent System Operator Corporation, 83 FERC ¶ 61,209 (1998).

² In its transmittal letter to the Compliance Filing, the ISO proposed instead to limit the proceeding to only those issues in a typical compliance filing, i.e., whether the ISO correctly complied with the Commission's orders, and that the remaining issues (i.e., those issues previously raised but not addressed by the Commission) be resolved through a later Clarification Filing. The ISO reiterated this proposal in the July 15, 1998, Clarification Filing (Docket No. ER98-3760-000) and in its July 31, 1998, Answer to Joint Movant's Motion for an Extension of Time to Respond to The Clarification Filing. Some parties have limited their comments in these proceedings to compliance issues; others have not. The Commission has not as yet acted upon the ISO's proposal.

Twenty-six parties have filed responses to the ISO's Compliance Filing. Most of these filings include motions to intervene, comments, protests, or requests for Commission action. In addition, many parties have accepted the Commission's invitation to include pleadings, generally styled as Comments, that address issues outside the scope of revisions proposed in the Compliance Filing. The issues addressed in these pleadings include issues left unresolved from earlier Commission orders in these dockets, as well as new issues.

REQUEST FOR EXTENSION OF TIME

In providing parties almost sixty days within which to raise both issues addressed in the ISO's Compliance Filing and those beyond the scope of the proposed revisions, the Commission recognized the potential multitude and complexity of the issues that might thus be raised. The parties have responded accordingly. Beyond the issues that the parties raise regarding the Compliance Filing, the parties have included pleadings raising numerous additional issues covering myriad aspects of the ISO Tariff, Protocols, and other agreements, some of which have not been raised previously.

The ISO's Compliance Filing plainly has raised a number of significant issues that led the Commission to establish an extended comment period. The number and complexity of issues that justified the extended period for responses to the Compliance Filing, however, virtually preclude the ISO from fully responding to these issues in the 15-day period provided for responses to such pleadings in the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213 (1997). The ISO therefore requests a modest two-week extension of time to answer the pleadings in response to the Compliance Filing. While time has not permitted counsel for the ISO to contact and obtain responses from all parties, the undersigned is authorized to state that counsel for the California Public Utilities Commission, Enron Power Marketing, Inc.,³ San Diego Gas

³ The ISO notes that it does not object to Enron Power Marketing, Inc.'s Motion to Intervene One Day Out of Time, filed in Docket Nos. EC96-19-029 and ER96-1663-030.

& Electric Company, Southern California Edison Company, and the Turlock Irrigation District would not oppose this requested extension.

CONCLUSION

WHEREFORE, the ISO respectfully requests that the Commission extend until September 3, 1998, the time permitted for the ISO to answer the pleadings filed in response to the Commission's June 9, 1998, Notice of Filing in this proceeding.

Respectfully

submitted, _____
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Dated: August 12, 1998

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the service list compiled by the Secretary in this proceeding.

Dated at Washington, DC, this 12th day of August, 1998.

Michael E. Ward
Counsel for the California Independent
System Operator Corporation