

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

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| AES Redondo Beach, L.L.C. |) | Docket Nos. ER98-2843-005 |
| |) | ER98-2843-006 |
| |) | and ER98-2843-007 |
| AES Huntington Beach, L.L.C. |) | Docket Nos. ER98-2844-005 |
| |) | ER98-2844-006 |
| |) | and ER98-2844-007 |
| AES Alamitos, L.L.C. |) | Docket Nos. ER98-2883-005 |
| |) | ER98-2883-006 |
| |) | and ER98-2883-007 |
| |) | (Not Consolidated) |
| El Segundo Power, LLC |) | Docket Nos. ER98-2971-006 |
| |) | ER98-2971-007 |
| |) | and ER98-2971-008 |
| Long Beach Generation, LLC |) | Docket Nos. ER98-2972-006 |
| |) | ER98-2972-007 |
| |) | and ER98-2972-008 |
| |) | (Not Consolidated) |
| Ocean Vista Power Generation, L.L.C. |) | |
| Mountain Vista Power Generation, L.L.C. |) | Docket Nos. ER98-2977-004 |
| Alta Power Generation, L.L.C. |) | ER98-2977-005 |
| Oeste Power Generation, L.L.C. |) | and ER98-2977-006 |
| Ormond Beach Power Generation, L.L.C. |) | |
| Williams Energy Services Company |) | Docket Nos. ER98-3106-002 |
| |) | ER98-3106-003 |
| |) | and ER98-3106-004 |
| Duke Energy Oakland, L.L.C. |) | Docket Nos. ER98-3416-004 |
| |) | ER98-3416-005 |
| |) | and ER98-3416-006 |
| Duke Energy Morro Bay, L.L.C. |) | Docket Nos. ER98-3417-004 |
| |) | ER98-3417-005 |
| |) | and ER98-3417-006 |
| Duke Energy Moss Landing, L.L.C. |) | Docket Nos. ER98-3418-004 |
| |) | ER98-3418-005 |

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|---|---|--------------------------|
| |) | and ER98-3418-006 |
| |) | (Not Consolidated) |
| Southern California Edison Company |) | Docket No. EL98-62-003 |
| |) | EL98-62-004 |
| |) | and EL98-62-005 |
| Sempra Energy Trading Corporation |) | Docket No. ER98-4497-002 |
| San Diego Gas & Electric Company |) | Docket No. ER98-4498-002 |
| California Independent System Operator Corporation |) | Docket No. ER99-1971-000 |

**MOTION OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION
FOR EXTENSION OF TIME TO SUBMIT COMPLIANCE FILING**

Pursuant to Rules 212 and 2008 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212 and § 385.2008, the California Independent System Operator ("ISO") respectfully requests that the Commission extend the period of time for the ISO to make the compliance filing required by the Commission's order issued on May 26, 1999 in the above-captioned dockets (the "May 26 Order")¹ by one week, from June 25, 1999 until July 2, 1999. In support of its request, the ISO states as follows:

1. On March 1, 1999, the ISO filed Amendment No. 14 to the ISO Tariff in Docket No. ER99-1971-000.² Amendment No. 14 includes a series of Tariff revisions that primarily implement portions of the ISO's comprehensive redesign of its Ancillary Service markets, in compliance with the Commission's

¹ *AES Redondo Beach, L.L.C., et al.*, 87 FERC ¶ 61,208 (1999).

² Capitalized terms not otherwise defined herein are used in the sense given in the Master Definitions Supplement, Appendix A to the ISO Tariff.

October 28, 1998, order in the above-captioned dockets.³ Amendment No. 14 also includes several other revisions to the ISO Tariff.

2. Numerous parties submitted motions to intervene and comments on Amendment No. 14. On April 12, 1999, the ISO filed its Answer responding to the various comments on Amendment No. 14 ("April 12 Answer"). In the April 12 Answer, the ISO agreed to make certain non-substantive changes to the Amendment No. 14 Tariff revisions which would address a number of comments on Amendment No. 14 and would be submitted in a compliance filing in the above-captioned dockets.

3. In the May 26 Order, the Commission approved Amendment No. 14 to the ISO Tariff, with certain modifications. The May 26 Order requires the ISO to make a number of changes to the Amendment No. 14 Tariff revisions, including the following: the addition of language to the Tariff to clarify how settlements are to be computed under the ISO's "rational buyer" approach to reducing the total costs of procuring Ancillary Services (slip op. at 23); technical revisions to the formulae which implement the ISO's "effective price" proposal (slip op. at 25); the addition of separate formulae that reflect the separate pricing of upward and downward components of the Regulation service (slip op. at 27); and revisions to the Tariff to clarify that trades of Ancillary Services between Scheduling Coordinators are permitted for resources outside the ISO Control Area (slip op. at 27-28). The May 26 Order directs the ISO to submit these Tariff changes in a compliance filing to be submitted within 30 days of the issuance of the order. May 26 Order, slip op. at 50.

³ *AES Redondo Beach, L.L.C., et al.*, 85 FERC ¶ 61,123 (1998).

4. In the past thirty days, the ISO staff have been devoting their efforts to a wide variety of regulatory matters in addition to the compliance filing required by the May 26 Order. These other matters include the preparation and filing of the following amendments to the ISO Tariff: Amendment No. 17, the ISO's June Quarterly Tariff filing which was submitted on June 17, 1999 and which includes Tariff revisions related to a *pro forma* Participating Load Agreement developed as part of the ISO's comprehensive redesign of the Ancillary Service markets; Amendment No. 18, which was submitted on June 18, 1999 and which would modify the Tariff on an expedited basis to address a defect in the ISO's current market rules for managing Intra-Zonal Congestion in real-time that could result in millions of dollars of additional costs to California end-use consumers; and Amendment No. 19, which was submitted on June 23, 1999 and which includes Tariff revisions related to the ISO's New Generator Interconnection Policy.

5. The ISO staff have also been preparing presentations to the ISO Governing Board on the Offer of Settlement addressing hundreds of unresolved issues to be submitted in Docket No. ER98-3760-000 and the Offer of Settlement in Docket Nos. ER98-997-000 and ER98-1309-000 involving the Participating Generator Agreement for Qualifying Facilities. The ISO Governing Board met this week and will not meet again until the end of August; presentation of these matters to the Governing Board was necessary to ensure that the ISO staff is authorized to file these offers of settlement with the Commission prior to the next Board meeting.

6. In light of the level of effort needed to address these other regulatory matters, the ISO has been unable to finalize the Tariff changes required to comply with the May 26 Order. A modest extension of time is necessary to ensure that the Amendment No. 14 compliance filing and associated Tariff changes fully satisfy the mandates of the Commission's order and the ISO's commitments to other parties. The ISO notes that this slight delay will have no impact on the implementation of Amendment No. 14. All relevant aspects of Amendment No. 14 are to go into effect upon 7-days notice that associated software modifications have been completed. The software necessary to implement Amendment No. 14 is currently undergoing testing, and the various aspects of the modified software are currently projected to be available beginning in third week of July, 1999.

7. Wherefore, the ISO respectfully requests that the Commission extend the date for the ISO's compliance filing in the above-captioned dockets until July 2, 1999.

Respectfully submitted,

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Dated: June 25, 1999