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April 8, 2004

Via Electronic Filing

The Honorable Magalie R. Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: California Independent System Operator Corporation
Docket No. ER03-1102-____**

Dear Secretary Salas:

Enclosed please find the Motion of the California Independent System Operator Corporation for Extension of Time to File Compliance Filing, submitted in the captioned proceeding.

Thank you for your attention in this matter.

Respectfully submitted,

/s/ Bradley R. Miliauskas

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Attorneys for the California Independent
System Operator Corporation

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

**California Independent System) Docket No. ER03-1102-____
Operator Corporation)**

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

Pursuant to Rule 212 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212, the California Independent System Operator Corporation ("ISO") hereby submits the instant motion for an extension of time to submit the compliance filing that is required by the Commission's Order on Tariff Amendment No. 55 issued on February 20, 2004 in the captioned proceeding ("February 20 Order").¹ That Order required the ISO to submit a compliance filing within 60 days of the issuance of the Order, *i.e.*, by April 20, 2004.² By the instant motion, the ISO requests a 30-day extension of time, *i.e.*, until May 20, 2004, to make the compliance filing.

The ISO submits that good cause exists to grant the ISO an additional 30 days to make its compliance filing. The Tariff modifications ordered by the Commission in its February 20 Order are both numerous and broad in scope and will require, among other things, a major overhaul of the Enforcement Protocol that the ISO filed in Tariff Amendment No. 55. For example, the February 20

¹ *California Independent System Operator Corporation*, 106 FERC ¶ 61,179 (2004).

² *See id.* at Ordering Paragraph (C).

Order requires the ISO to establish an exhaustive list of violations that will not allow for any open-ended discretion on the part of the ISO.³ Few of the Tariff modifications required by the February 20 Order are ministerial in nature. Rather, most of the Tariff revisions will require the ISO to make substantive modifications to the Enforcement Protocol.

The ISO has been working diligently to put together the compliance filing required by the February 20 Order. However, given the volume, scope, and importance of the Tariff revisions, and the limited availability of certain key personnel, the ISO requires additional time to complete and submit the compliance filing. In particular, the ISO needs additional time to ensure that the revised Tariff language will be as clear and unambiguous as possible. It is imperative that the “rules of the road” governing market participant conduct be clearly delineated. The ISO believes that granting the requested 30-day extension will provide the ISO with sufficient time to complete its internal review, draft Tariff language that is clear and unambiguous, and finalize the compliance filing.

³ See *id.* at P 29.

Wherefore, for the foregoing reasons, the ISO respectfully requests that the Commission grant the instant motion and establish a due date of May 20, 2004 for the ISO's compliance filing.

Respectfully submitted

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Dated: April 8, 2004

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in the above-captioned proceeding, in accordance with Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, CA, on this 8th day of April, 2004.

/s/ Anthony J. Ivancovich
Anthony J. Ivancovich