

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

**California Independent System
Operator Corporation**

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Docket No. ER11-2256-000

**MOTION OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
FOR EXTENSION OF TIME TO FILE POST TECHNICAL CONFERENCE
COMMENTS**

Pursuant to Rules 212 and 2008 of the Commission's Rules of Practice and Procedure,¹ the California Independent System Operator Corporation ("ISO") respectfully requests a 30-day extension of time for the filing of initial post-technical conference comments and post technical conference reply comments. In support of this motion, the ISO states as follows:

1. On April 28, 2011, the Commission held a technical conference to address, *inter alia*, issues designated by FERC staff related to the ISO's proposed Capacity Procurement Mechanism compensation methodology, Exceptional Dispatch mitigation provisions, and eligibility of demand response to participate in the Resource Adequacy program. By Notice issued May 3, 2011, the Commission established May 27, 2011 as the date for the parties to file initial post-technical conference comments and June 15, 2011 as the date for filing post technical conference reply comments.

2. Subsequent to the technical conference, the ISO has had discussions with several parties to see if there was any interest in the ISO convening a meeting of the

¹ 18 C.F.R. §§ 385.212 and 385.2008 (2010).

parties to this proceeding and facilitating discussions among them in an attempt to achieve a joint resolution of the outstanding compensation issues in this proceeding. Based on the favorable response the ISO received from the parties with whom it spoke, the ISO believes that the Commission and the parties would benefit from face-to-face settlement discussions on these issues and the ISO attempting to facilitate a joint resolution of such issues.

3. Additional time is needed in order to conduct these settlement discussions and attempt to reach a joint resolution of the outstanding issues with the parties. Accordingly, the ISO requests that the Commission grant the parties a 30-day extension of time to file initial and reply comments on the technical conference. Under such revised schedule, initial post technical conference comments would be due on June 27, 2011, and post technical conference reply comments would be due on July 14, 2011. Extending the comment filing dates by 30 days will permit the parties to focus exclusively on resolution of the compensation issues and should provide the parties with sufficient time to address such issues. Absent such an extension, the ISO and other parties will be forced to commit their limited resources to drafting comments and reply comments and focus on supporting their litigation positions, as opposed to endeavoring to reach a settlement of the issues. Thus, adherence to the adopted comment dates would impinge on any meaningful opportunity for the ISO and the parties to engage in discussions and reach a joint resolution of the issues in this proceeding. Granting the requested extension will benefit the parties to this proceeding, as well as the Commission, because it could facilitate an agreed-to resolution of the

compensation issues and potentially avoid further and protracted litigation of these issues.

4. The ISO is authorized to state that the following parties support the proposed 30-day extension: California Municipal Utilities Association, Calpine Corporation, GenOn, Independent Energy Producers Association, Northern California Power Authority, NRG, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Six Cities, Southern California Edison, and Western Power Trading Forum. The ISO notes that, given time constraints, it was not able to contact every party to this proceeding regarding an extension and has not heard back from all of the parties that it did contact.

5. Until the Commission rules on this motion, the ISO and other parties must, out of necessity, begin drafting their initial comments on the issues discussed at the technical conference. Accordingly, the ISO requests that the Commission (1) shorten the applicable period for responding to this motion and require that any responses or comments be submitted by May 23, 2011, and (2) expeditiously grant the instant motion no later than May 24, 2010 so that any unnecessary work can be avoided and the parties can focus their efforts on developing a framework for resolving, and undertaking discussions to resolve, the outstanding issues in this proceeding.

CONCLUSION

For the reasons set forth above, the CAISO respectfully requests that the Commission grant a 30-day extension of time for the filing of initial and reply comments on the technical conference in this proceeding.

Respectfully submitted,

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Dated: May 20, 2011

Certificate of Service

I hereby certify that I have this day served a copy of this document upon all parties listed on the official service list compiled by the Secretary in the above-captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated this 20th day of May, 2011, in Folsom, CA.

/s/ Charity N. Wilson
Charity N. Wilson