

**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 an additional extension of time until October 28, 2011 for filing initial post-technical conference comments and until November 15, 2011 for filing 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.

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

2. Subsequent to the technical conference, the ISO contacted several parties to this proceeding to see if there was any interest in the ISO convening a meeting and facilitating discussions among the parties in an attempt to achieve a joint resolution of the outstanding compensation issues in this proceeding. Based on the favorable response received, on May 20, 2011 the ISO filed a motion requesting a 30-day extension of the procedural schedule for the parties to file initial and reply comments on the technical conference in order to allow additional time to conduct these settlement discussions,. On May 23, 2011, the Commission issued a notice granting an extension of time to file post-technical conference initial comments until June 27, 2011 and reply comments until July 14, 2011.

3. Following the extension, the ISO conducted phone calls with representatives from each of the industry segments that are parties to the proceeding, and initiated a series of face-to-face meetings and teleconferences to discuss settlement with all parties. On June 9, 2011, the ISO filed a motion requesting a second extension of time. The ISO stated that it had engaged in positive discussions with the parties, but that additional time was required to conduct the settlement discussions and attempt to reach a joint resolution of the outstanding issues. On June 14, 2011, the Commission issued a notice that granted all parties an extension of time to file post-technical conference initial comments until July 27, 2011 and reply comments until August 15, 2011.

4. On July 21, 2011, the ISO filed a motion requesting a further extension of time to file post-technical comments because the parties reached a settlement in principle and needed additional time to draft settlement documents and engage in

further discussions. On July 27, 2011, the Commission issued a notice that granted all parties an extension of time to file post-technical conference initial comments until August 29, 2011 and reply comments until September 15, 2011.

5. The ISO requests that the Commission grant an additional extension of time for the parties to submit post-technical conference comments until October 28, 2011 for initial comments and until November 15, 2011 for reply comments. The parties are making progress, but have not yet completed, drafting the settlement documents. Extending the comment filing dates by approximately 60 days should afford sufficient time for the parties to complete the settlement documents and for the ISO to submit the settlement to the Commission. Granting the extension will thereby benefit the parties to this proceeding, as well as the Commission, and may avoid further and protracted litigation of the issues.

6. 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 August 26, 2011, and (2) expeditiously grant the instant motion no later than August 29, 2011 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 ISO respectfully requests that the Commission grant the requested extension of time for the filing of initial and reply comments on the technical conference in this proceeding.

Respectfully submitted,

/s/ Beth Ann Burns

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Dated: August 25, 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 25th day of August, 2011, in Folsom, CA.

Is/ Anna Pascuzzo
Anna Pascuzzo