

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

Interconnection for Wind Energy                    )                    RM05-4-\_\_\_\_

**MOTION OF CALIFORNIA INDEPENDENT SYSTEM OPERATOR FOR  
EXTENSION OF TIME TO SUBMIT COMPLIANCE FILINGS**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.212, the California System Operator Corporation (“CAISO”) requests an extension of time to January 18, 2006 for (1) the CAISO to file its revised Large Generator Interconnection Procedures (“LGIP”) and (2) the CAISO and Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (collectively “Participating Transmission Owners” or “PTOs”) to file their revised Large Generator Interconnection Agreement (“LGIA”) that incorporate certain changes and technical requirements mandated by Commission Orders Nos. 661<sup>1</sup> and 661-A<sup>2</sup> for wind plant Interconnection Customers. The CAISO has consulted with the PTOs regarding this request and the CAISO has been authorized to represent that each of the PTOs supports the request for extension.

**I. STATEMENT OF ISSUES**

Pursuant to Rule 203(a)(7) of the Commission’s Rules of Practice and Procedure, as modified by Commission Order No. 663 (FERC Stats. & Regs.

---

<sup>1</sup> 111 FERC ¶61,353 (June 2, 2005).  
<sup>2</sup> 113 FERC ¶61,254 (November 12, 2005).

(CCH), Regulations Preambles ¶¶ 31,393 (2005), the CAISO hereby provides the following statement of the issues to be decided:

Whether to permit the CAISO until the effective date of Order 661-A or January 18, 2006, to make the required LGIP and LGIA compliance filings, pursuant to Order Nos. 661 and 661-A, regarding interconnection for wind generation?

## **II. MOTION FOR EXTENSION OF TIME**

### **A. Background**

The Commission in Order No. 661, as modified by notice dated October 28, 2005, required the CAISO and other utilities to submit compliance changes to their LGIPs and LGIAs by December 30, 2005. Order No. 661-A, which granted rehearing on certain issues and requires further changes to the LGIP and LGIA filings, was issued on December 12, 2005, thus establishing another compliance filing deadline of thirty days from the publication of this order in the Federal Register. This publication occurred on December 19, 2005, rendering the effective date January 18, 2006. Order No. 661-A did not, however, rescind or extend the original December 30, 2005 deadline for submitting the compliance filing.

### **B. Need For Additional Time**

A straightforward reading of the Commission's two orders requires the CAISO and the PTOs to make two compliance filings to effectuate the same result. Because this would unnecessarily tax the resources of the CAISO, PTOs, and the Commission, and because it would not benefit the Interconnection

Customer,<sup>3</sup> the CAISO requests this extension of time to file until the effective date of Order No. 661-A on January 18, 2006.

If the Commission instead meant that the entire compliance filing be filed by December 30, 2005, including the provisions of Order No. 661-A issued on December 12, 2005, then the CAISO submits that this is not sufficient time to read, analyze, and discuss the new provisions with relevant stakeholders, and make the compliance filing. As the Commission is aware, the State of California has set an aggressive goal that 20 percent of the energy component of load-serving entities' portfolios be supplied by renewable generation by the end of 2010. A significant component of this renewable portfolio will involve the development of wind generation, including the possible development of approximately 4,000 MW of new wind resources in the Tehachapi region of Southern California. Thus, it is important that the CAISO carefully assess the effects of Order Nos. 661 and 661-A when applied to its particular circumstances. The CAISO has begun this undertaking, but eighteen days is insufficient especially considering that many key staff members are on holiday during this time period.

Consequently, the CAISO requests that the Commission permit the CAISO until the effective date of Order 661-A to make the required LGIP and LGIA compliance filings regarding interconnection for wind generation. Granting the CAISO's motion will not alter the effective date of the changes ordered by the Commission, and would thus have no adverse effect on stakeholders. In

---

<sup>3</sup> A filing on December 30 would have no impact on the Interconnection Customer because the Commission's order on rehearing is not in effect until 30 days after Order No. 661-A is published in the Federal Register, which can be no earlier than late January.

addition, the proposed extension would conserve resources of the CAISO, PTOs, the Commission and other parties by allowing the CAISO to incorporate into a single filing the various sets of changes ordered by the Commission in its recent decisions. Resources conserved would include the filing of a single revised LGIP and LGIA, rather than one revision to the LGIP and LGIA followed closely by new revisions, publication of only a single notice of filing, and a decrease in the staff time and Commission time needed to review the changes. Such conservation of resources would be in the public interest.

### **III. CONCLUSION**

For the foregoing reasons, the Commission should grant this Motion and permit the CAISO until the effective date of Order 661-A on January 18, 2006 to make the LGIP and LGIA compliance filings regarding interconnection for wind generation.

December 19, 2005

Respectfully submitted,

Kenneth G. Jaffe  
Michael Kunselman  
Alston & Bird LLP  
601 Pennsylvania Ave., NW  
North Building, 10<sup>th</sup> Floor  
Washington, DC 20004  
Tel: (202) 756-3300  
Fax: (202) 756-3333

**/s/ Grant Rosenblum**  
Charles F. Robinson  
General Counsel  
Grant Rosenblum  
Regulatory Counsel  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 351-4400  
Fax: (916) 351-2350

Counsel for the California Independent  
System Operator Corporation



December 19, 2005

**VIA ELECTRONIC FILING**

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

**Re: Interconnection for Wind Energy  
Docket No. RM05-4-\_\_\_**

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceeding is the Motion of the California Independent System Operator Corporation for Extension of Time to Submit Compliance Filings.

Thank you for your attention to this matter.

Yours truly,

**/s/ Grant Rosenblum**  
Grant Rosenblum

Counsel for the California Independent  
System Operator Corporation

**CERTIFICATE OF SERVICE**

I hereby certify that I have, this 19th day of December 2005, caused to be served a copy of the forgoing document upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

**/s/ Grant Rosenblum**  
Grant Rosenblum