

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

California Independent System) Docket No. ER06-615-____
Operator Corporation)
) Docket No. ER02-1656-____
)

**MOTION TO DEFER COMMISSION ACTION IN SETTING DATE FOR TECHNICAL
CONFERENCE AND TO SHORTEN RESPONSE TIME FOR ANSWERING THIS
MOTION**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”),¹ the California Independent System Operator Corporation (“CAISO”) respectfully submits this procedural motion requesting that the Commission defer setting the date for the planned technical conference on the allocation of intertie capacity for Resource Adequacy purposes until such time that the CAISO has submitted revisions to its intertie allocation proposal.

In its September 21 Order in this proceeding, in response to the CAISO’s request, the Commission directed its staff to convene a technical conference to discuss an equitable methodology for allocating import capacity for purposes of meeting the proposed Resource Adequacy requirements.² In reviewing the methodology submitted in the MRTU Tariff filing and with its experience under the Interim Resource Requirements Program (“IRRP”), the CAISO believes that the tariff language reflected in the IRRP is the more appropriate framework from which to further evaluate refinements for incorporation into the MRTU Tariff. Accordingly, the CAISO proposes to

¹ 18 C.F.R. § 385.212 (2004).

² *California Independent System Operator, Inc.*, 116 FERC ¶ 61, 274 at P 1226 (2006).

make a filing with the Commission on December 11, 2006, based on the IRRP that identifies areas that it believes warrant additional assessment for possible inclusion in the MRTU Tariff. The CAISO believes this proposal will significantly advance the resolution of this issue and make the technical conference more productive for the Commission and the CAISO's stakeholders.

Therefore, the CAISO respectfully requests that the Commission withhold publishing a date for the technical conference until such time as the CAISO's enhanced intertie allocation proposal has been filed. Alternatively, the CAISO requests that the Commission set a date that allows stakeholders sufficient time to file comments on the December 11 filing.

The CAISO also respectfully requests the Commission grant the appropriate waivers of its rules and regulations sufficient to allow a shortened response time to this Motion. The CAISO requests that the Commission grant parties three (3) business days to respond to this Motion. The CAISO believes this waiver is necessary to ensure that the Commission can act swiftly in granting this Motion and proceed to scheduling the technical conference at a date that accommodates the CAISO's revised intertie allocation proposal. The CAISO believes that this enhanced proposal, and scheduling the technical conference to accommodate it, will expedite, not delay, resolution of this critical market design issue.

WHEREFORE, for the foregoing reasons, the CAISO respectfully requests that the Commission grant this Motion and (i) defer scheduling the technical conference until such time as the staff and the CAISO's stakeholders have had sufficient time to comment on the proposal to be filed on December 11, 2006, and (ii) grant appropriate waivers and allow parties to this proceeding three (3) business days to respond to this Motion.

Respectfully submitted,

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Dated: December 1, 2006

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 1st day of December, 2006 at Folsom in the State of California.

/s/ Sidney M. Davies

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