

March 21, 2002

The Honorable Magalie Roman Salas Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, DC 20426

Re: Williams Energy Marketing & Trading Company Docket No. ER02-91-000

Dear Ms. Salas:

Enclosed for filing in the above-captioned proceeding, please find an original electronic filing of the attached document entitled: "Joint Motion for a further three week extension of time to file protests of the California Independent System Operator Corporation, Southern California Edison Company, the California Public Utilities Commission, the California Electricity Oversight Board, AES Southland, LLC, and Williams Energy Marketing & Trading Company".

Respectfully submitted,

Jeanne M. Solé Counsel for the California Independent System Operator Corporation

UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

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Williams Energy Marketing & Trading Company Docket No. ER02-91-000

JOINT MOTION FOR A FURTHER THREE WEEK EXTENSION OF TIME TO FILE PROTESTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION, SOUTHERN CALIFORNIA EDISON COMPANY, THE CALIFORNIA PUBLIC UTILITIES COMMISSION, THE CALIFORNIA ELECTRICITY OVERSIGHT BOARD, AES SOUTHLAND, LLC, AND WILLIAMS ENERGY MARKETING & TRADING COMPANY

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 Independent System Operator Corporation, Southern California Edison Company, the California Public Utilities Commission, the California Electricity Oversight Board, AES Southland, LLC, and Williams Energy Marketing & Trading Company ("Williams") (collectively, "the Parties") jointly move for a further three week extension of time to file protests in the above-captioned proceeding. The Parties seek a time extension to continue settlement negotiations and, if necessary, prepare and submit protests to Williams' Schedule F Informational Filing.

On January 28, 2002, the Parties filed an unopposed joint motion setting forth a proposed revised procedural schedule as follows:

Intervenor Data Requests	February 1, 2002	
Williams Data Responses	February 22, 2002	

Informal Data/Settlement ConferenceMarch 1, 2002Intervenor ProtestsMarch 15, 2002

On February 6, 2002, the Commission granted the unopposed, joint motion and adopted the revised procedural schedule. On March 7, the Parties filed a motion for a one week extension of time to file protests. On March 14, the Commission granted this joint motion.

The Parties have continued to exchange information and are engaged in settlement discussions. However, the Parties require additional time to continue settlement discussions and to document any outstanding issues. To allow the Parties to continue to focus their limited resources on undertaking settlement discussions, the Parties seek a three week extension for the filing of intervenor protests to April 12, 2002.

The Parties aver that the extension requested is in the public interest as it will allow them to focus their limited resources on undertaking settlement discussions and will likely narrow -- if not eliminate -- areas of disagreement over Williams' Schedule F Information Filing. No party will be prejudiced by Commission approval of the instant joint motion.

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Wherefore, in view of the foregoing, the Parties respectfully and jointly request that the Commission grant the requested extension of time.

Respectfully submitted,

Dated: March 21, 2002

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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 this proceeding.

Dated at Folsom, California on this 21th of March 2002.

Jeanne M. Solé The California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630