

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

**California Independent System )            Docket No.     ER06-615-\_\_\_\_  
Operator Corporation            )**

**MOTION FOR ADDITIONAL EXTENSION OF TIME OF THE CALIFORNIA  
INDEPENDENT SYSTEM OPERATOR TO SUBMIT REPORT**

**I.     Introduction**

Pursuant to Rules 212 and 2008(a) of the Commission's Rules of Practice,<sup>1</sup> the California Independent System Operator Corporation (the ISO) respectfully submits this motion on behalf of its Market Surveillance Committee (MSC) for an additional extension of time until June 7, 2010 to file its analysis of alternatives to the ISO's current three-pivotal-supplier test for determining local market power.

In a September 21, 2006 Order (September 2006 Order),<sup>2</sup> the Commission considered the ISO's proposal to utilize for its new markets a three-pivotal-supplier test in considering whether transmission paths are competitive or non-competitive. In the September 2006 Order, the Commission accepted the ISO's proposal, but ordered the MSC, "during the first year of implementation, to examine whether an alternative competitive screen to identify market power opportunities for generation in load pockets should be considered."<sup>3</sup> The

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<sup>1</sup> 18 C.F.R. §§ 385.212, 385.2008(a).

<sup>2</sup> *Cal. Indep. Sys. Operator Corp.*, 116 FERC ¶ 61,274 (2006).

<sup>3</sup> *Id.* at P 1032.

September 2006 Order additionally mandated the MSC “to include its findings in the CAISO’s quarterly, post-implementation performance reports.”<sup>4</sup>

Based on the schedule of filing the post-implementation reports, the MSC’s analysis was due on April 30, 2010. On April 30, 2010, the ISO filed a motion on behalf of the MSC requesting an extension of time until May 28, 2010, to file its report. The MSC today is requesting a further extension of time until June 7, 2010 so that its report can be discussed and formally adopted at the MSC’s June 4, 2010 meeting.

## **II. There is Good Cause for Granting the MSC an Extension of Time**

At the time the Motion for Extension was filed, the MSC contemplated adopting this report through an ad hoc meeting scheduled for the sole purpose of adopting the report. Upon further reflection, it seems that a preferable course of action would be to consider the draft report in the context of a regularly scheduled MSC meeting. Following this approach would provide stakeholders with a better opportunity to consider the report and provide feedback to the MSC. For this reason, the MSC intends to add formal consideration of this report to the agenda of its already-scheduled June 4, 2010 meeting. The MSC has already completed a draft report analyzing the three-pivotal-supplier test, as well as a broader consideration of the ISO’s locational market power mitigation procedures (LMPM). This draft report will be posted on the ISO’s website today.<sup>5</sup> Following consideration and adoption of a final report on June 4, the final report would then

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<sup>4</sup> *Id.*

<sup>5</sup> The report will be available at the following link:  
<http://www.caiso.com/279d/279da1c23b9f0.html>.

be filed with the Commission on June 7, 2010, which is the Monday following the June 4 meeting.

### **III. Conclusion**

For the above-stated reasons, the ISO requests on behalf of the MSC that the Commission grant the MSC an additional extension of time until June 7, 2010 to file its alternative competitive screen analysis with the Commission. Granting such an extension would permit the MSC and stakeholders the opportunity to consider this matter formally as part of its regular meeting schedule, rather than through an ad hoc process.

Respectfully submitted,

**/s/ David S. Zlotlow**

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Dated: May 28, 2010

## CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service lists in the above-referenced 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 at Folsom, California this 28<sup>th</sup> day of May, 2010.

*Anna Pascuzzo*  
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