

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

**California Independent System                    )     Docket No. ER05-80-000  
Operator Corporation                            )**

**MOTION FOR DELAYED ACTION OF THE  
CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR CORPORATION**

Pursuant to Rules 212 and 213 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, 385.213, the California Independent System Operator Corporation (“ISO”) hereby requests that the Commission delay its action on the unexecuted Meter Service Agreement for ISO Metered Entities (“MSA”) between the ISO and the City of Azusa, California (“Azusa”) filed by the ISO in this docket on October 27, 2004 for thirty days. In support whereof, the ISO states as follows.

**I. Background**

On October 27, 2004, the ISO<sup>1</sup> filed an unexecuted MSA between the ISO and Azusa. As noted in the October 27 transmittal letter, the purpose of the MSA

---

<sup>1</sup> Capitalized terms not otherwise defined herein have the meaning set forth in the Master Definitions Supplement, Appendix A to the ISO Tariff.

is to establish the terms and conditions upon which the ISO shall certify the revenue quality meters of Azusa as an ISO Metered Entity and the terms on which Azusa will make meter data available to the ISO revenue meter data acquisition and processing system. The MSA was filed in an unexecuted form due to Azusa's refusal to enter into the MSA without significant alterations, because the meters in question would be owned and operated by Southern California Edison Company ("SCE").

On November 17, 2004, the Southern Cities<sup>2</sup> filed a Motion to Intervene and Protest ("Protest") of the MSA Filing, and Southern California Edison Company ("SCE") filed a Motion to Intervene and Comments. On December 2, 2004, the ISO and SCE filed separate Motions for Leave to File Answer and Answer to the Southern Cities' Protest. In response, the Southern Cities filed a Motion for Leave to Respond and Response to the December 2 motions of the ISO and SCE on December 17, 2004.

## **II. REQUEST FOR DELAYED ACTION**

The ISO requests that the Commission delay its action on the MSA for thirty days to allow the parties to attempt to resolve the issues. If the parties are successful, it will spare both the Commission and the parties the expenditure of resources that would inevitably result from having the matter set for hearing or other proceedings at FERC. Granting this Motion is, therefore, in the public interest.

---

<sup>2</sup> In addition to Azusa, the Southern Cities consist of the Cities of Banning and Riverside, California

### III. CONCLUSION

Wherefore, for the foregoing reasons, the ISO respectfully requests that the Commission delay action on the MSA for thirty days pending the parties' efforts to resolve the outstanding issues.

Respectfully submitted,

/s/ **John Anders**

Charles F. Robinson  
General Counsel  
John Anders  
Corporate Counsel  
The California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 608-7049  
Fax: (916) 608-7296

/s/ **Julia Moore**

David B. Rubin  
Julia Moore  
Bradley R. Miliauskas  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, Suite 300  
Washington, DC 20007  
Tel: (202) 424-7500  
Fax: (202) 424-7643

Date: December 20, 2004

## CERTIFICATE OF SERVICE

I hereby certify I have this day served the foregoing document on each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Folsom, CA, on this 20<sup>th</sup> day of December, 2004.

/s/ **John Anders**  
John Anders