

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

Revised Public Utility Filing Requirements) Docket No. RM01-8-000
Electric Quarterly Reports) Docket No. ER02-2001-000

**MOTION OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION FOR FURTHER, LIMITED EXTENSION OF
TIME TO FILE CORRECTED ELECTRIC QUARTERLY REPORT**

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 ("ISO") requests leave to submit its corrected Fourth Quarter 2002 Electric Quarterly Report ("EQR") at a time after the current EQR software problem is corrected. In support of this motion, the ISO states as follows.

I. Background

On April 25, 2002, Commission issued Order 2001,¹ amending its filing requirements under the Federal Power Act to require public utilities to file electronically Electric Quarterly Reports summarizing the contractual terms and conditions in their agreements for all jurisdictional services (including market-based power sales, cost-based power sales, and transmission service) and transaction information for short-term

¹ *Revised Public Utility Filing Requirements*, Order No. 2001, 67 FR 31043, FERC Stats. & Regs. ¶ 31,127 (April 25, 2002) ("Order 2001"); *reh'g denied*, Order No. 2001-A, 100 FERC ¶ 61,074, *reconsideration and clarification denied*, Order No. 2001-B, 100 FERC ¶ 61,342 (2002). See also *Revised Public Utility Filing Requirements*, Order No. 2001-C, 101 FERC ¶ 61,314 (2002), and Order No. 2001-D, 102 FERC ¶ 61,334 (2003).

and long-term market-based power sales and cost-based power sales during the most recent calendar quarter.

On February 20, 2003, the ISO submitted what it believed was its Fourth Quarter 2002 EQR in accordance with the Commission's 2001 Orders.

On March 24, 2003, the Commission issued a "Notice of Electric Quarterly Reports Workshop." The Workshop was intended to allow Commission staff to explain and demonstrate improvements to the EQR software and "lessons learned" from the Fourth Quarter 2002 EQR experience. In addition, as described in an April 4, 2003 "Notice Providing Further Details on Electric Quarterly Reports Workshop," the Commission stated that it was "interested in soliciting questions and/or comments regarding the EQR Submission and Dissemination Systems in advance of, as well as during, the Workshop." April 4, 2003 Notice at 1.

Due to concerns raised by a number of public utilities regarding the ability to complete the corrected Fourth Quarter 2002 EQR required by the Commission, on March 28, 2003, the Commission issued Order 2001-D, which required that public utilities file corrected Fourth Quarter EQRs by April 11, 2003. The specific corrections outlined in Order 2001-D included, but are not limited to, Total Transaction Charge field comma errors, file conversion errors, and lack of DUNS numbers. The ISO and several other entities requested extensions in the date for filing the corrected Fourth Quarter 2002 EQRs, in light of the fact that the Workshop was scheduled for that same day. The ISO, in its April 8 Motion for Extension of Time, requested that it be permitted to file on April 25 to "allow the CAISO to digest and apply the direction provided by the Workshop." In response to the several requests, without specifically identifying the

various entities that filed motions, the Commission on April 9, 2003 issued a "Notice of Extension of Time" extending the date by which all public utilities must file the corrected EQR to April 18, 2003.

The ISO forwarded questions to Commission staff on April 8, 2003, as requested in the April 4 Notice. The EQR Workshop took place as scheduled on April 11, 2003 and the ISO was in attendance. The ISO found the Workshop extremely enlightening and the information gathered and guidance received at the Workshop will allow the ISO to make significant strides in its effort to file the correct information with the Commission.

On April 17, 2003, the ISO filed a motion that requested, *inter alia*, a one-week extension from the April 18 due date to submit its revised Fourth Quarter 2002 EQR. The Commission has not yet acted on the ISO's April 17 motion.

II. Argument

The ISO seeks a further limited extension in time to submit its corrected Fourth Quarter 2002 EQR due to malfunctions/glitches currently occurring the Commission's EQR software. The ISO had been working diligently to complete its revised EQR, and had anticipated no difficulty in submitting it today, the date requested in its April 17 motion. Unfortunately, this has not been possible do to the problem occurring with the EQR software.

As described in a notice on the Commission's EQR web page,

URGENT EQR SOFTWARE NOTICE (4/25/03 - 10:00 a.m.): There are continuing problems with adding new Contract and Contract Products data in the EQR software. We are working right now to resolve an issue with duplicate "Unique" Identifiers, which is the root of the problem. We expect

to have this situation resolved quickly, but in the meantime, we recommend that you suspend manual data entry into the EQR system until further notice.²

Because the ISO needs to enter manually several items in its corrected EQR, it will not be able to complete the report until this problem is resolved. The ISO notes that this problem began yesterday, and the ISO communicated the difficulties it was experiencing to the pertinent Commission personnel when it recognized the extent of the problem.

III. Conclusion

For these reasons, the ISO requests that the Commission grant its request for a further limited extension of time submit its corrected Fourth Quarter 2002 EQR.

Respectfully submitted,

/s/ Julia Moore

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Dated: April 25, 2003

² See <http://www.ferc.gov/Electric/eqr/eqr.htm> .

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 the above-captioned docket.

Dated at Washington, DC, on this 25th day of April, 2003.

/s/ Julia Moore
Julia Moore