

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

California Independent System Operator Corporation)	Docket Nos. RM05-17-000 RM05-25-000
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**MOTION OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION FOR EXTENSION OF TIME**

Pursuant to Rules 212 and 2008(a) of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, 385.2008(a) (2007), the California Independent System Operator Corporation (“CAISO”) respectfully requests a two-week extension of time until December 21, 2007 to comply with the Commission’s *Order Extending Compliance Date and Establishing Technical Conferences*, 120 FERC ¶ 61,103 (2007), issued on July 27, 2007 in the above-captioned dockets (“Extension Order”).

I. Motion for Extension of Time

Order No. 890, among other things, directs each transmission provider to amend its open access transmission tariff to include a coordinated, open, and transparent transmission planning process in a new Attachment K. In the Extension Order, the Commission extended the date for filing Attachment K from October 11, 2007 to December 7, 2007 “[t]o allow for additional time to develop that tariff language, and to provide for further stakeholder and state commission input into its development.”¹ Consistent with this objective, the Commission also

¹ Extension Order at P 5.

established a second round of planning-related technical conferences. For the CAISO that technical conference is scheduled for October 23, 2007.

The CAISO requests that the Commission grant the CAISO a short two-week extension of time -- until December 21, 2007 -- to file its Attachment K. Such an extension will permit the CAISO to incorporate the outcome of the technical conference and other CAISO stakeholder activities into its final Order No. 890 transmission planning-related compliance filing and to obtain CAISO Governing Board approval of the key elements of the filing prior to submitting the filing to the Commission.

As required by Rule 2008(a), the CAISO submits that good cause exists to grant the CAISO's requested extension of time. The CAISO Board of Governors meets on October 16-17, 2007, and again on December 12-13, 2007. There is no November 2007 Board meeting. Because the October Board meeting precedes the Commission-scheduled technical conference on October 23, 2007 (and stakeholder interaction that will follow the October 23 Board meeting), the CAISO would not have a final proposal to take to the Board at the October Board meeting. However, the December Board meeting comes after the Attachment K filing deadline established by the Commission. Consequently, in order for the CAISO to properly incorporate the outcome of the technical conference, (as well as subsequent stakeholder input) into a final proposal, for the Board to consider such proposal, and to realize the stated purpose of the Extension Order, *i.e.*, to facilitate greater stakeholder input into the transmission provider's Attachment K,

the CAISO's compliance filing must follow its December Board of Governors' meeting.

Under established CAISO business practice, the CAISO Board of Governors approves or reviews policy elements underlying CAISO Section 205 tariff amendment filings. This practice generally does not encompass filings to comply with Commission directives to implement specific, well-defined tariff language. However, two aspects of the anticipated Order No. 890 filing warrant Board of Governor review and approval. First, the Commission has not adopted a *pro forma* Attachment K which it is requiring transmission providers to implement; rather, the Commission has merely adopted nine general principles that transmission providers should follow in developing a compliant transmission planning process and has granted transmission providers substantial flexibility in crafting their individual transmission planning processes, provided they are consistent with the general "guidance" provided by the Commission. Second, the CAISO is considering modifying certain elements of its existing open access transmission tariff that, while compliant with Order No. 890 standards, could benefit from additional clarification. Because specific elements of the CAISO's filing raise important policy and process issues and result in significant changes to the CAISO's tariff -- and the Commission has not directed the CAISO to implement the specific mechanisms that it is proposing (rather it has only provided general guidance) -- it is necessary and appropriate for CAISO management to present its proposal to the CAISO Board of Governors for review prior to submitting a filing to the Commission..

The above-stated reasons support a finding of good cause to grant the CAISO the requested extension of time. In addition, the CAISO submits that its stakeholders will not suffer prejudice by granting the extension. The Commission has recognized that independent system operators and regional transmission operators such as the CAISO already have Commission-approved transmission planning processes that are significantly more open and transparent than the transmission planning processes of traditional, vertically-integrated utility transmission providers.² The CAISO believes that the existing transmission planning provisions of its Tariff already protect market participants against undue discrimination and preference in transmission service, and a two week extension will not cause any harm to market participants or result in any delay in implementing the CAISO's transmission plan for 2008.

² Order No. 890 at P 439.

II. Conclusion

For the foregoing reasons, the CAISO requests that the Commission grant this motion to extend the filing date for the Order No. 890 transmission planning process from December 7, 2007, to December 21, 2007.

Respectfully submitted,

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Dated: October 9, 2007

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 9th day of October, 2007 at Folsom in the State of California.

/s/ Grant Rosenblum

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