

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

Regional Transmission Organizations)
)
) Docket No. RM99-2-000

**MOTION OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
TO FILE COMMENTS OUT-OF-TIME**

Pursuant to Rule 212 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212, the California Independent System Operator Corporation ("Cal-ISO"), hereby moves for leave to file its Initial Comments on the Commission's May 13, 1999 Notice of Proposed Rulemaking on Regional Transmission Organizations ("NOPR" or "RTO NOPR") four days out of time.¹ In support of this motion, the ISO states as follows:

The additional time requested was necessary in order to present the Initial Comments on the RTO NOPR to the Cal-ISO Governing Board. The Cal-ISO had prepared its Initial Comments in substantially the form submitted to the Commission today by Monday, August 23. Because the Commission's RTO NOPR addresses and solicits comment on a wide range of issues relating to the structure and operation of regional transmission operators, such as the Cal-ISO, however, these Comments were presented to the Governing Board for review and approval prior to filing with the Commission. The first meeting of the Cal-ISO Governing Board in the past two months was held yesterday, August 26. At that meeting, the Governing Board approved the filing of the Initial Comments.

¹ Pursuant to an order issued on this proceeding on August 5, 1999, initial comments on the NOPR were due August 23, 1999.

The Cal-ISO does not believe that the modest delay in submitting its own Initial Comments will prejudice any interested party. Nonetheless, the Cal-ISO would not oppose any party that requests a comparable extension, if necessary, to reply to the Cal-ISO's Initial Comments.

WHEREFORE, the ISO respectfully request that the Commission grant it leave to file its Comments four days out of time

Respectfully submitted,

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