UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

California Independent System)Docket No. ER05-1501-000Operator Corporation)

ANSWER TO MOTION FOR EXTENSION OF TIME OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION

Pursuant to Rules 213 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213 (2005), and the Commission's October 7, 2005 Notice Shortening Answer Period, the California Independent System Operator Corporation ("CAISO") hereby submits this answer to the Motion for Extension of Time and Request for Shortened Response Time and Expedited Action filed by the Transmission Agency of Northern California, Modesto Irrigation District, the City of Santa Clara, California, doing business as Silicon Valley Power, M-S-R Public Power Agency and the City of Redding (collectively "Movants") on October 6, 2005. Movants request an extension of time until October 27, 2005 for the filing of comments and protests in response to the CAISO's filing of the simplified and revised version of the CAISO's tariff (S&R Tariff).

- I. STATEMENT OF ISSUES
 - The CAISO does not oppose Movant's motion for extension time for submittal of comments provided the Commission issue its order on or before November 21, 2005 pursuant to Section 205 of the Federal Power Act.
 - Alternatively, consistent with its consent to the extension of time, the CAISO also consents to a deferral of the Commission's action on the CAISO's Section 205 filing to December 5, 2005, provided that the Commission also waive Order No.

1

614 requirements to permit the CAISO to use the S&R Tariff as the platform for presenting black-line changes required by 18 C.F.R. § 35.10(c) in the November 30, 2005 filing of the CAISO's Tariff reflecting the CAISO's Market Redesign and Technology Upgrade (MRTU) and without delaying the requested November 21, 2005 effective date. *See e.g., Duke Energy Oakland*, "Notice of Extension of Time," November 19, 2004 in FERC Docket No. ER05-115-000 (applicant consents to deferral of Commission action).

II. ANSWER

The CAISO does not oppose Movants' request for extension of the comment period in this docket. Although the CAISO disagrees that the "revisions represent a fundamental change of the Tariff which could generate substantial financial and operational repercussion to Market Participants," Motion at ¶ 11 (since the S&R Tariff is substantively identical to existing Tariff, which the Commission has found to be just and reasonable), the CAISO agrees that the filing is "voluminous." Accordingly, the CAISO has no objection to the request for a two-week extension if the Commission not delay issuance of its order beyond November 21, 2005, consistent with Section 205(d) of the Federal Power Act. 16 U.S.C. § 824d(d).

Alternatively, the CAISO does not object to the Commission deferring its decision by two-weeks (see e.g., Duke Energy Oakland, "Notice of Extension of Time," November 19, 2004 in FERC Docket No. ER05-115-000), provided that the Commission grant a waiver of Order No. 614 requirements to permit the CAISO to use the S&R Tariff as the platform for presenting black-line changes required by 18 C.F.R. § 35.10(c) in the November 30, 2005 filing of the CAISO's MRTU market design. One of the main

2

purposes the CAISO sought to achieve in filing the S&R Tariff was to simplify and reorganize the existing ISO Tariff to display the MRTU language in as clear and well organized a manner as possible. The CAISO will be making its MRTU Tariff filing on November 30, 2005 and the timing of the S&R was intended to ensure a Commission order prior to the MRTU filing. So long as the objective of being able to use the S&R Tariff as a baseline for the MRTU filing can be accommodated, the CAISO has no objection to the extension as requested by Movants.

III. CONCLUSION

For the reasons discussed above, the CAISO does not oppose the extension of time.

October 11, 2005

Respectfully submitted,

/s/ Sidney Mannheim Davies

Charles F. Robinson General Counsel Sidney Mannheim Davies Assistant General Counsel The California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 Tel: (916) 608-7147



October 11, 2005

VIA ELECTRONIC FILING

The Honorable Magalie R. Salas Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426

Re: California Independent System Operator Corporation Docket No. ER05-1501-000

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceeding is the Answer to the Motion for Extension of Time of the California Independent System Operator Corporation.

Thank you for your attention to this matter.

Yours truly,

/s/ Sidney Mannheim Davies

Sidney Mannheim Davies Associate General Counsel

Counsel for the California Independent System Operator Corporation

Enclosure

CERTIFICATE OF SERVICE

I hereby certify that I have this 11th day of October 2005 caused to be served a copy of the forgoing document upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

<u>/s/ Sidney Mannheim Davies</u> Sidney Mannheim Davies