

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

San Diego Gas & Electric Company,)	
Complainant,)	
)	
v.)	Docket Nos. EL00-95-000, et al.
)	
Sellers of Energy and Ancillary Services)	
Into Markets Operated by the California)	
Independent System Operator and the)	
California Power Exchange,)	
Respondents.)	
)	
Investigation of Practices of the California)	Docket Nos. EL00-98-000, et al.
Independent System Operator and the)	
California Power Exchange)	

**REQUEST FOR EXTENSION OF TIME OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rule 212 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure, 18 C.F.R. § 385.212, the California Independent System Operator Corporation ("CAISO")¹ submits this request for a four business day extension of time to provide parties to this proceeding certain data as required by the Commission in its January 26, 2006 order, 114 FERC ¶ 61,070 (2006) ("January 26 Order") issued in the above-captioned dockets.

In the January 26 Order, the Commission found that there were a number of apparent discrepancies between the revenue data submitted by sellers in their cost-

¹ Capitalized terms not otherwise defined herein are used in the sense given in the Master Definitions Supplement, Appendix A to the ISO Tariff.

based filings, and the data supplied to the Commission by the CAISO and the California Power Exchange (“PX”). To reconcile any discrepancies that have resulted from the use of different data sets, the Commission directed the CAISO and PX to merge and finalize² their settlements revenue data for the Refund Period, including all manual adjustments and reflecting the application of MMCPs, and to distribute this data to parties within 15 days of the date of the January 26 Order. January 26 Order at PP 57, 389.

The CAISO is currently in the process of compiling this data. However, the CAISO requires several days in addition to the 15 days allocated by the Commission in the January 26 Order in order to ensure that the data is accurate, complete, and up to date. Therefore, the CAISO is requesting a four business day extension of the Commission’s deadline to complete this process and distribute the data to the parties to this proceeding. If the Commission were to grant this request, the CAISO would distribute the data no later than Thursday, February 16, 2006, to be received by parties the following day.

The CAISO submits that no party should be prejudiced by granting this brief extension. Moreover, the CAISO believes that this extension will expedite, rather than delay, the final resolution of this proceeding. Taking the necessary time now to ensure that the data is as accurate and complete as possible will help avoid the possibility of additional effort and re-calculations later.

² The CAISO understands this directive to mean that the CAISO must distribute settlements data to parties that includes both the automatic and manual records, and reflects the most recent adjustments to the data. However, the CAISO does not believe that the January 26 Order directs the CAISO to attempt to combine the manual records and the automatic records for each interval in order to create a single record for each transaction. As the CAISO has explained to parties in the past, such a task would be incredibly burdensome, and would likely require many months of intensive effort.

For these reasons, the CAISO respectfully requests that the Commission extend the 15-day deadline set forth in the January 26 Order for submitting the settlements revenue data by four business days.

Respectfully submitted,

Charles F. Robinson
Daniel J. Shonkwiler
The California Independent
System Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
Tel: (916) 608-7147

/s/ Michael Kunselman
Sean A. Atkins
Michael Kunselman
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, DC 20007
Tel: (202) 424-7500

Dated: February 10, 2006

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list for the captioned proceeding, in accordance with Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, CA, on this 10th day of February, 2006

Daniel J. Shonkwiler
Daniel J. Shonkwiler