

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

**Williams Energy Marketing
& Trading Company**

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Docket No. ER02-91-000

**FURTHER UNOPPOSED JOINT MOTION
FOR AN EXTENSION OF TIME**

The California Independent System Operator ("ISO"), Williams Energy Marketing & Trading Company ("Williams" or "Company"), the California Electricity Oversight Board ("EOB"), Southern California Edison Company ("SCE") and AES Southland, LLC ("AES"),¹ pursuant to Rule 212 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212, hereby respectfully and jointly move for a further extension of time for the submission of "Protests" in the above captioned proceeding. Specifically, the Parties seek an additional extension to July 5, 2002, to finalize filing details associated with an "Offer of Settlement" circulated by and among Williams, the ISO, CPUC, EOB, SCE and AES.

In support of the Further Unopposed Joint Motion, the following is shown:

1. On October 12, 2002, pursuant to the Reliability Must-Run Agreement (the "RMR Agreement") between the Company and the ISO, Williams submitted a Schedule F Informational Filing for Commission review and approval. The RMR Agreement governs the delivery of "Energy" and the provision of "Ancillary Services" by Williams to the ISO. Schedule F, among other things, details and supports an "Annual

¹ The ISO, Williams, the EOB, SCE and AES are sometimes referred to hereinafter as the "Parties." The California Public Utilities Commission ("CPUC") could not be reached to indicate their opinion on this motion.

Fixed Revenue Requirement" and "Variable O&M Rates" proposed by the Company for the generation units providing service to the ISO.

2. Pursuant to Schedule F and several time extension requests granted by the Commission, the Parties conducted discovery, convened a data conference, exchanged several settlement proposals and engaged in extensive and intensive negotiations.

3. The settlement discussions and negotiations culminated in an agreement in principle resolving the issues germane to the Company's Schedule F Informational Filing. More specifically, by "Joint Motion of the Parties for an Additional Extension of the Deadline to File Protest," submitted April 26, 2002, the Parties notified the Commission that an agreement in principle had been reached and that the Parties needed an additional three weeks to prepare an Offer of Settlement and related settlement documents. By an "Unopposed Joint Motion For An Extension of Time," submitted May 17, 2002, the Parties requested an additional extension, until June 7, 2002, to discuss and secure approvals for the Offer of Settlement and related documents. By another "Unopposed Joint Motion For An Extension of Time," submitted June 7, 2002, the Parties requested an additional extension, until June 14, 2002, to secure specific commitments from entities in a related proceeding for full resolution of the instant proceeding. On June 14, 2002, the parties requested an additional three-week extension, until July 1, 2002, to secure the necessary approvals for the Offer of Settlement.

4. By "Notice of Extension of Time," issued May 1, 2002, the Commission granted the requested three-week extension and, assuming a final settlement is not reached, extended the deadline for the submission of Protests to May 17, 2002. By

"Notice of Extension of Time," issued May 20, 2002, the Commission further extended the deadline for the submission of Protests to June 7, 2002.

5. The Parties reiterate that an agreement in principle resolving the instant proceeding has been reached. A further additional extension is needed, however, to finalize filing details and documents. The Parties, thus, need additional time to finalize these details and documents.

6. The Parties, accordingly, respectfully request an additional extension until July 5, 2002, for the submission of Protests, in the event that the filing details and documents cannot be finalized associated with the Offer of Settlement.

7. Counsel for the ISO is authorized to state that Williams, the EOB, SCE and AES support the requested extension.

8. No Party will be prejudiced by Commission approval of the instant extension request.

WHEREFORE, in view of the foregoing, the Parties respectfully request that the Commission grant the instant Unopposed Joint Motion for an Extension of Time.

Respectfully submitted

/s/ Jeanne M. Solé

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