

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Pacific Gas and Electric Company,)
et al.)

Docket Nos. EC96-19-000
and ER96-1663-000

**MOTION OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION
FOR AN EXTENSION UNTIL MARCH 31, 2000 FOR THE FILING
OF A TRANSMISSION ACCESS CHARGE METHODOLOGY**

On December 28, 1999, the California Independent System Operator Corporation ("ISO") requested, and on January 10, 2000, the Commission granted, an extension of time to and including February 7th for the filing of the ISO's Transmission Access Charge proposal. In its request, the ISO described the stakeholder and decision making process that it has put in place, including a January 13th workshop for its Governing Board. That workshop was held, and this additional request is filed at the explicit request of the Board members who took part in that discussion. Specifically, we request an extension until March 31, 2000 for the filing of a transmission Access Charge methodology. In view of the fact that the last Board meeting prior to the current filing date of February 7th will be held on January 26th and 27th, we most respectfully request that the Commission act on this motion by no later than January 25th. If this motion is granted, the ISO and its governing board pledge that the filing will be made on March 31, 2000. This motion is filed with the

full support of a broad constituency that has a vital stake in the timely development of an access charge methodology.¹

When dealing with an issue as complex as the development of a grid-wide transmission charge for an area that combines the service territories of three investor-owned utilities, the challenges are formidable. When there is added to that the objective of developing an access charge methodology that would facilitate the participation of municipal and other publicly-owned systems, the problems become truly daunting, as the Commission itself recognized in Order No. 2000. 89 FERC ¶ 61,285 (Slip. Op. at 578-92 (1999)). From the outset, however, that has been the ISO's overriding objective: to adopt a win-win methodology; one that hastens expansion of the ISO-controlled grid for the benefit of all of California's electricity consumers.

In view of the inherent complexities, success surely cannot be assumed until all details are finalized. Nevertheless, as a result of the Board workshop, the ISO is even more optimistic today that consensus may be achievable, at least for many otherwise contentious issues. Absent the progress that literally is being made daily, the ISO would be loathe to support additional delay. But if a consensual resolution can at least narrow the issues to be litigated, if not avoid entirely the need for litigation, the objectives of the

¹Those supporting this request include: Agricultural Energy Consumers Association; Alameda Power & Telecom; California Department of Water Resources; California Municipal Utilities Association; City of Anaheim; City of Burbank; City of Colton; City of Glendale; City of Redding; City of Roseville; City of Santa Clara; City of Vernon; Energy Users Forum; Los Angeles Department of Water and Power (LADWP); Pacific Gas & Electric; San Diego Gas & Electric Company; Silicon Valley; Southern California Edison; The Utility Reform Network and Utility Consumers' Action Network (TURN/UCAN); and Western Area Power Administration.

ISO, of the State of California and, we believe, of the Commission, necessarily will be advanced. It is unrealistic to expect public systems even to consider seriously ISO participation while major issues remain for prolonged litigation.

The ISO Board has committed to a demanding schedule. Specifically, the Board has scheduled working sessions for itself on January 21st and January 28th and a workshop for the public on January 24th. Then in February, the Board will hold public sessions to address the access charge issues on February 2nd, 7th and 14th. ISO management's tariff principles were sent to the Market Participants on January 14th. The tariff language implementing management's proposal that has been developed to date will be released to the Market Participants this week. As those principles and tariff language are refined, the modifications too will be made public.

If this request is granted, the Board commits to adopt an access charge proposal by no later than its March 23rd meeting, and to file it by no later than March 31st. It will not, at that time, request a shortening of the sixty-day notice period.²

²Under California's restructuring legislation, A.B. 1890, the ISO is required, by April 1, 2000, to "recommend for adoption by the Federal Energy Regulatory Commission" an access charge methodology. Section 9600(a)(2)(A). The legislation does not specify an effective date.

CONCLUSION

For the foregoing reasons, the ISO requests an extension of the time for the filing of its Access Charge Methodology proposal to an including March 31, 2000 and that the Commission act on this motion by no later than January 25, 2000.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this 18th day of January, 2000, served by first-class mail, postage prepaid, a copy of the foregoing upon all parties listed on the service list compiled in these proceedings.

Edward Berlin