UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

California Independent System)	Docket Nos. ER06-615
Operator Corporation)	ER08-367

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

Pursuant to Rules 212 and 2008 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.2008 (2007), the California Independent System Operator Corporation ("CAISO") hereby respectfully moves for an extension of time to comply with certain elements of the Commission's order issued on December 4, 2008, 125 FERC ¶ 61,262 (2008) in the above captioned dockets. Specifically, the CAISO requests an extension of time until January 15, 2009 to comply with Paragraphs 58-61 of the December 4 order requiring the CAISO to revise various sections of the MRTU tariff regarding Voltage Support and Black Start to allocate these costs under MRTU consistent with the manner these costs are allocated under the currently effective tariff to the extent possible.¹ As explained below, this request will allow the CAISO to consolidate the directed revisions into a subsequent filing of more comprehensive revisions to the provisions of the MRTU tariff regarding Voltage Support and Black Start.

In support of its motion, CAISO states the following.

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

I. MOTION FOR EXTENSION OF TIME

In Paragraphs 58- 61 of the December 4 order, the Commission directed the CAISO to make revisions proposed by the CAISO to the MRTU tariff regarding Voltage Support and Black Start. However, in the interim period since the CAISO's December 2007 filing, the CAISO has undertaken a stakeholder process regarding the provisions for Voltage Support and Black Start that has identified even further tariff clarifications consistent with the CAISO's objective to adapt pre-existing tariff policies relating to Voltage Support and Black Start to be consistent with the MRTU tariff to the extent possible. The CAISO posted its more comprehensive set of MRTU tariff revisions for stakeholder review and comment prior to the December 4 order and received no stakeholder objections.²

Consequently, the CAISO requests leave to defer submitting the revisions to the provisions regarding Voltage Support and Black Start that were directed by the Commission in the December 4 order and to consolidate the directed revisions into a subsequent filing of revisions to the MRTU Tariff to be submitted pursuant to Section 205 of the Federal Power Act. The CAISO intends to submit this separate filing of MRTU tariff revisions very shortly and no later than January 15, 2009, so no party will be prejudiced by granting this extension. To the contrary, the more comprehensive and integrated approach to the revisions to the Voltage Support and Black Start provisions gained by virtue of the consolidation of the revisions directed by the Commission with the other revisions presented to stakeholders will benefit stakeholders and the Commission by permitting their review in context and in a single filing.

² The CAISO has posted the proposed revisions and stakeholder comments on the CAISO website (<u>www.caiso.com</u>) under the heading "Miscellaneous Tariff Clarifications" at the following internet address: <u>http://www.caiso.com/17ba/17ba873e19350.html</u>.

II. CONCLUSION

For the reasons set forth above, the CAISO respectfully requests that the Commission grant this motion for extension of the time permitted to submit revisions to the MRTU tariff provisions regarding Voltage Support and Black Start to comply with Paragraph 61 of the December 4 order until January 15, 2009.

Respectfully submitted,

/s/ Michael D. Dozier

Sidney M. Davies Assistant General Counsel Mike Dozier Senior Counsel California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 Tel: (916) 351-4400

Dated: January 5, 2009

Certificate of Service

I hereby certify that I have this day served a copy of this document upon all parties listed on the official service list compiled by the Secretary in the above-captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated this 5th day of January, 2009 at Folsom in the State of California.

<u>Isl Anna Pascuzzo</u> Anna Pascuzzo