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

California Independent System Operator Corporation	) ) )	Docket No. ER14-1386-000
	)	

## ANSWER OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION TO MOTION FOR EXTENSION OF POWEREX CORP.

The California Independent System Operator Corporation ("ISO") hereby submits this Answer to the Motion for Extension of Deadline for Comments and Request for Shortened Comment Period filed in this proceeding on March 4, 2014, by Powerex Corp. ("Powerex"). Powerex requests a 39-day extension. In light of the extensive opportunity for stakeholder to review and evaluate the Energy Imbalance Market tariff provisions at issue in this proceeding, such an extension is unnecessary. It would also interfere with the Commission's ability to rule on the tariff filing by the date requested by the ISO. Nonetheless, the ISO would not object to a modest extension of no more than five business days.

The ISO filed the Energy Imbalance Market tariff amendment on February 28, 2014. The filing followed an extensive stakeholder process spanning almost eleven months, with five posted discussions of the proposal, a posted tariff framework, and four postings of draft tariff language. There were over a dozen stakeholder meetings and calls. Neither Powerex nor any another

The ISO files this answer pursuant to Rule 213 of the Commission's Rules of Practice and Procedures, 18 C.F.R. § 385.213 (2013).

stakeholder can reasonable assert the need for additional time to review and analyze the proposal.

Although Powerex correctly notes that PacifiCorp has yet to file its corresponding revisions to its open access tariff, Powerex will have the opportunity to comment on those revisions when they are filed. Powerex also points to the fact that the Energy Imbalance Market builds on the ISO's fifteenminute market tariff amendment filed in Docket No. ER14-480-000, on which the Commission has not ruled. Whatever the impact of the Commission's ruling may be, it should not interfere with Powerex's ability to comment on the Energy Imbalance Market provisions as filed.

Moreover, the ISO has requested a ruling by June 20, 2014, in order to allow implementation of the new market on October 1, 2014. Powerex's requested extension would allow the Commission less than two months to review the amendment if the Commission is to issue a ruling before the scheduled market simulation, as the ISO has requested. Stakeholders, including Powerex, have had almost a year to review and evaluate the ISO's proposal. The Commission's time to review the filing should not be unnecessarily curtailed.

Nonetheless, in the event the Commission believes it is appropriate to provide interested parties with additional time to submit comments, the ISO would not object to a modest extension of the comment period by no more than five business days.

Respectfully submitted,

<u>/s/ John C. Anders</u> John C. Anders

Kenneth G. Jaffe Michael E. Ward Alston & Bird LLP The Atlantic Building 950 F Street, NW Washington, DC 20004 Tel: (202) 239-3300 Fax: (202) 654-4875 Roger Collanton, General Counsel Sidney M. Davies, Assistant General Counsel John C. Anders, Lead Counsel California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630

Tel: (916) 351-4400 Fax: (916) 608-7296

Counsel for the California Independent System Operator Corporation

Dated: March 6, 2014

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each party listed on the official service list for this proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010 (2013)).

Dated at Washington, D.C. on this 6th day of March, 2014.

/s/ Michael E. Ward Michael E. Ward Alston & Bird LLP

20140306-5143 FERC PDF (Unofficial) 3/6/2014 3:52:51 PM	
Document Content(s)	
20140306_ER14-1386 ISO Answer re Powerex Extension.PDF1-4	