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December 23, 2002

The Honorable Magalie R. Salas Secretary Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

Re: California Independent System Operator Corporation, et al., Docket Nos. ER98-3760-000, et al.

Dear Secretary Salas:

THEODORE J. PARADISE

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Enclosed with this letter, please find one original and fourteen copies of the California Independent System Operator Corporation's Motion for Extension of Time to Prepare Compliance Filing in the above-captioned dockets. Two additional copies are enclosed to be stamped and returned to our messenger. Thank you for your assistance with this matter.

Respectfully submitted,

Theodore J. Paradise

Counsel for the California Independent System Operator Corporation

Enclosure

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

California Independent System Operator Corporation	) ) Doc )	cket No.	ER98-3760-000
Pacific Gas and Electric Company San Diego Gas and Electric Company and Southern California Edison Company	) ) Doc )	cket Nos.	EC96-19-009 and ER96-1663-010
California Independent System Operator Corporation	) ) Doo )	cket Nos.	EC96-19-030 ER96-1663-031

## MOTION OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION FOR EXTENSION OF TIME TO PREPARE COMPLIANCE FILING

Pursuant to Rules 212 and 2008 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212 and 2008 (2002), the California Independent System Operator Corporation ("ISO") respectfully requests that the Commission extend the time for the ISO to make its compliance filing in the above-captioned proceeding from December 23, 2002 to January 7, 2003. In support of this request, the ISO states as follows:

- 1. The above dockets deal with outstanding issues related to the ISO. Parties filed briefs and reply briefs in the above dockets addressing several unresolved issues.
- 2. On November 22, 2002, the Federal Energy Regulatory Commission ("Commission") issued an order ("November 22 Order") on the outstanding issues. As part of the November 22 Order, Commission directed the ISO to submit a compliance filing with regard to the issues discussed in the body of the order. The compliance filing was directed to be made within 30 days of the issuance of the order. This establishes a due date of December 23, 2002.

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California Independent System Operator Corporation, et al., 101 FERC ¶ 61,219 (2002).

- 3. Due to the significant volume of work faced by its staff, the ISO has only recently been able to assemble the components of the compliance filing required by the Commission's November 22 Order. The volume of work has also been compounded by the reduced level of staff during the holiday season. The ISO is in need of an extension of time to ensure that its compliance filing comports with the Commission's directions.
- 4. WHEREFORE, the ISO respectfully requests that the Commission extend the date for the ISO's compliance filing in this matter to January 7, 2003.

Respectfully submitted,

David B. Rubin

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Counsel for the California Independent System Operator Corporation

Dated: December 23, 2002

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 23<sup>rd</sup> day of December at Washington in the District of Columbia,

Theodore J. Paradise, Esq. (202) 424-7500