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January 30, 2004

The Honorable Magalie R. Salas  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

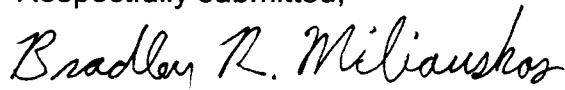
**Re: California Independent System Operator Corporation  
Docket No. ER03-746-\_\_\_**

Dear Secretary Salas:

Enclosed is the Motion for Extension of Time and Informational Filing Concerning Compliance Filing of the California Independent System Operator Corporation, submitted today in the above-captioned proceeding.

Two extra copies of this filing are also enclosed. Please stamp these copies with the date and time filed and return them to the messenger. Please feel free to contact the undersigned if you have any questions regarding this filing.

Respectfully submitted,



J. Phillip Jordan  
Bradley R. Miliauskas

Counsel for the California  
Independent System Operator  
Corporation

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

California Independent System        )  
Operator Corporation                    )        Docket No. ER03-746-\_\_\_\_

**MOTION FOR EXTENSION OF TIME AND INFORMATIONAL FILING  
CONCERNING COMPLIANCE FILING OF THE CALIFORNIA INDEPENDENT  
SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (“ISO”)<sup>1</sup> respectfully submits this motion for extension of time and informational filing concerning the compliance filing that the Commission directed the ISO to submit in the Commission’s Order on Rehearing and Compliance Filing issued on November 14, 2003 in the above-captioned docket, 105 FERC ¶ 61,203 (“November 14 Order”).

**I.     Background**

On April 15, 2003, the ISO filed Amendment No. 51 to the ISO Tariff in the above-captioned docket (“Amendment No. 51”) to facilitate Settlement Statement re-runs and adjustments to Scheduling Coordinator invoices that the ISO explained it planned to conduct in preparation for the re-run in the California refund proceeding in Docket Nos. EL00-95, *et al.* The Commission conditionally accepted Amendment No. 51, suspended the tariff changes proposed therein pending further Commission action, and, as relevant here, directed the ISO to

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<sup>1</sup> Capitalized terms not otherwise defined herein are used in the sense given in the Master Definitions Supplement, Appendix A to the ISO Tariff.

explain and justify each of the ISO's proposed re-runs and adjustments.

*California Independent System Operator Corporation*, 103 FERC ¶ 61,331 (2003). On July 3 and July 9, 2003, the ISO submitted filings to comply with the Commission's directive.

In the November 14 Order, the Commission authorized and directed the ISO to re-run its settlement system to take certain issues into account while denying such authority with respect to other issues, and directed the ISO, *inter alia*, to submit a compliance filing, by January 30, 2004, that contains the "results, explanations and details of the CAISO's adjustments and re-run in this proceeding." (Hereinafter in this filing, the ISO will refer to the re-runs and adjustments described in the November 14 Order collectively as the "preparatory re-run," and will refer to the re-run in the California refund proceeding as the "refund re-run".) To comply with the November 14 Order, the ISO immediately began work internally on the preparatory re-run, and began publishing statements for the preparatory re-run on December 18, 2003.

In its Request for Rehearing of the November 14 Order timely submitted on December 15, 2003 ("Request for Rehearing"), the ISO, *inter alia*, requested that the Commission rescind its directive that the ISO submit the compliance filing by January 30. Request for Rehearing at 3. The ISO explained that it was endeavoring to complete its re-runs as fast as possible, consistent with ensuring accuracy, but that even its best-case schedule would not allow it to complete the preparatory re-run by January 30, 2004 and submit a compliance filing by that date. *Id.* at 7-8. The ISO requested that the Commission allow the ISO to submit

the required compliance filing not by January 30, but rather as soon as practicable. *Id.* at 9.

**II. Motion for Extension of Time to Submit Compliance Filing, and Next Steps**

As explained above, the ISO's best-case schedule would not have allowed it to complete the preparatory re-run by January 30 and submit a compliance filing by that date. Pursuant to Rule 212 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212 (2003), the ISO respectfully moves for an extension of time in which to submit the compliance filing required by the November 14 Order.

The ISO intends to provide the compliance filing as soon as is practicable. In addition, by February 11, 2004, the ISO will submit a filing containing its comprehensive schedule concerning the preparatory re-run, the refund re-run, and the financial clearing phase of the re-run effort.<sup>2</sup>

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<sup>2</sup> In the April 25, 2003 Request for Rehearing and/or Clarification that the ISO submitted in Docket Nos. EL00-95, *et al.*, the ISO explained (at pages 17 and 46) that the ISO estimated it would take a total of twelve weeks to complete its preparatory re-run production. The ISO continues to believe this estimate is accurate. The ISO will provide further information in its February 11, 2004 filing.

**III. Conclusion**

As set forth above, the ISO respectfully moves for an extension of time to submit the compliance filing required by the Commission in the November 14 Order, and commits to file its comprehensive schedule by February 11, 2004.

Respectfully submitted,

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Dated: January 30, 2004

## CERTIFICATE OF SERVICE

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

Dated at Folsom, CA, on this 30<sup>th</sup> day of January, 2004.

Gene L. Waas<sup>BRM</sup>  
Gene L. Waas