

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

California Independent System)	Docket Nos. ER02-1656-017
Operator Corporation)	ER02-1656-018
)	ER02-1656-019
)	ER04-928-000
)	and
Public Utilities Providing Service in)	
California under Sellers' Choice)	EL04-108-000
Contracts)	
California Independent System)	Docket Nos. ER02-1656-003
Operator Corporation)	ER02-1656-004
)	ER02-1656-015
)	EL01-68-000

MOTION FOR EXTENSION OF TIME

Pursuant to Rules 212 and 2008 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212 and § 385.2008 (2004), the California Independent System Operator Corporation ("CAISO") moves for an extension of the deadline for filing two compliance filings:

- (1) the requirement in the Commission's Order of September 20, 2004, that the CAISO provide additional information on the merits of its proposed simplified hour-ahead scheduling process; and
- (2) the requirement in the Commission's Order of October 28, 2003 that the CAISO submit a filing explaining of any market design

changes that result from the California Public Utility Commission's ("CPUC") final rule on resource adequacy.

As explained below, good cause supports the motion as it will permit the CAISO to provide the Commission a more comprehensive analysis of these important issues, and, with regard to the issue of resource adequacy, permit the CAISO to bring the matter to the attention of the CAISO Governing Board at its meeting in January.

I. Extension of Time for Submission of Information on the Hour-Ahead Market

A. Background

In its June 17, 2004 *Order on Further Development of the California ISO's Market Redesign and Establishing Hearing Procedures*, 107 FERC ¶ 61,274, the Commission accepted the CAISO's proposal for a simplified hour-ahead market. In its September 20, 2004 Order, however, the Commission found that additional information was necessary to allow the Commission to make a decision on the proper hour-ahead market functionality and structure. *Order on Rehearing of the California ISO's Market Redesign*, 108 FERC ¶ 61,254, at P 43. The Commission required that the CAISO file the information within 30 days of the Order. *Id.* at P 46.

On October 20, 2004, the CAISO filed a request for an extension until November 30, 2004 to submit the required information. This request was granted by the Commission on October 25, 2004.

B. Need for Limited further Extension

By this motion, the CAISO requests a further extension of seven weeks of the deadline to submit the additional information regarding the simplified hour ahead market as required by the Commission's September 20, 2004 Order. The additional time is

necessary to finalize the CAISO's submission. In particular, the CAISO is considering how best to integrate the Hour-Ahead scheduling process with the overall market design. The CAISO believes the additional time will result in a more informative submission that will better serve the Commission and market participants in the consideration of this important market design element.

Accordingly, the CAISO respectfully requests an additional extension of seven weeks until January 18, 2005.

II. Extension of Time for Submission of Compliance Filing on Resource Adequacy

A. Background

In its *Further Order on the California Comprehensive Market Redesign Proposal* issued on October 28, 2003, the Commission ordered the CAISO "to submit a further filing outlining any necessary changes to their market design in response to the final rule [on resource adequacy] issued by the CPUC within 60 days if the issuance of the final rule." 105 FERC ¶ 61,140, at P 216. On October 28, 2004, the CPUC issued its *Interim Opinion Regarding Resource Adequacy*, Decision 04-10-035.

B. Need for an Extension

The CAISO respectfully requests an extension until February 7, 2005 of the date to file the requested information concerning its resource adequacy and market power mitigation proposals. The extension is necessary for the CAISO to bring the important issues of resource adequacy and the companion issue of market power mitigation before its Governing Board at the meeting scheduled for January 27, 2005. The CAISO would make its compliance filing approximately a week later.

Given the limited nature of the extension request, the difficulty in finalizing these submissions during the holiday season, and the importance to the CAISO of receiving the direction of its Governing Board on these vital issues, the CAISO submits that good cause exists for the Commission to grant the requested extension.

III. Conclusion

For the reasons discussed above, the CAISO respectfully asks that the Commission grant the requested extensions of time for the submittal of the two compliance filings.

Respectfully submitted,

/s/ David B. Rubin

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Dated: November 30, 2004

CERTIFICATE OF SERVICE

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

Dated at Folsom, California, on this 30th day of November, 2004.

/s/ Anthony J. Ivancovich
Anthony J. Ivancovich