

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

**California Independent System Operator     )  
Corporation   )**     **Docket No. ER05-718-003**

**MOTION FOR TWO-WEEK SUSPENSION OF  
EXPANDED ANALYSIS REQUIREMENT**

Pursuant to Rule 212 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.212 (2005), the California Independent System Operator Corporation (“CAISO”),<sup>1</sup> hereby requests that the Commission suspend, for two weeks, the requirement that the CAISO include an expanded analysis in its weekly reports detailing the implementation of Amendment No. 66. As explained below, the CAISO requires a two-week window to set in place the analytic framework and procedures for regular weekly production of the expanded analysis.

**I.     DISCUSSION**

In its order issued in the above-captioned proceeding on September 30, 2005, 112 FERC ¶ 61,352 (2005) (“September 30 Order”), the Commission approved the CAISO’s request to continue to settle intertie transactions on an “as-bid” basis, up until the time the CAISO implements a “long-term” solution to settling intertie bids, as part of the Market Redesign and Technology Upgrade

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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.

("MRTU") process. In that order, the Commission directed the CAISO to continue to file its weekly reports detailing the impacts of the "as-bid" settlement methodology.<sup>2</sup> The Commission also required the CAISO to include with these reports an additional analysis as requested and detailed by Powerex in its comments on the CAISO's proposal to continue to settle transactions using the "as-bid" methodology. September 30 Order at P 27.

The CAISO respectfully requests that the Commission suspend, for the weekly report filed in this docket today and the weekly report after that, the requirement that the CAISO include the additional analysis requested by Powerex. Due to the time required to establish the analytic framework and procedures to perform this additional weekly analysis, and existing constraints on Department of Market Monitoring ("DMM") staff, the CAISO cannot begin to provide this analysis until the second weekly report following the report being filed today. Specifically, the information required to provide the analysis directed by the Commission must be derived from data-intensive calculations, which means that performing this analysis will consume a significant amount of staff time. Moreover, because of its complex nature, only certain DMM personnel are qualified to perform this analysis. Accordingly, DMM must undertake some shifting of work responsibilities to ensure weekly compliance in the future.

The CAISO also submits that no party will be prejudiced by the Commission granting a two-week suspension, because the scope of the CAISO's analysis will not be affected by the suspension – the CAISO's first report

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<sup>2</sup> The Commission originally required the CAISO to file these weekly reports in its order approving Amendment No. 66, a Tariff Amendment in which the CAISO proposed to settle intertie bids, on an interim basis, using the "as-bid" methodology.

containing the required analysis will include all of the data that would have been included in prior reports, but for the suspension.

For these reasons, the CAISO respectfully requests that the Commission suspend the requirement that the CAISO provide the additional analysis discussed herein for the “as-bid” impact report filed today and the next weekly “as-bid” impact report.

Respectfully submitted,

/s/ Michael Kunselman

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Dated: October 11, 2005

## 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 11<sup>th</sup> day of October, 2005 at Folsom in the State of California.

/s/ Sidney M. Davies

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