

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

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

**MOTION FOR TEMPORARY SUSPENSION OF
WEEKLY REPORTING 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"),¹ hereby requests that the Commission grant the CAISO a temporary four-week suspension of the requirement that it submit weekly reports concerning the market effects of the "as bid" settlement methodology, beginning with the report for the week of October 30, 2005. As explained below, changes to the CAISO's data correction process have prevented the CAISO's Department of Market Monitoring ("DMM") from obtaining on a timely basis the data necessary to prepare the weekly reports. However, the CAISO has developed a solution that will allow it to recommence submitting reports as of the week of November 27, 2005.

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

I. STATEMENT OF ISSUES

1. The Commission should temporarily suspend the requirement that the CAISO submit weekly reports on the effect of the “as bid” settlement methodology for four weeks, from the week of October 30, 2005 until the week of November 27, 2005.

II. BACKGROUND

In its order issued on April 7, 2005 in the above-captioned proceeding, 111 FERC ¶ 61,008 (2005), the Commission approved the CAISO’s request to modify the manner in which it settles import and export bids from System Resources so as to settle those bids using an “as bid” methodology. In that order, the Commission also required the CAISO’s Department of Market Monitoring to submit weekly reports concerning the market effects of the “as bid” methodology. In its September 30, 2005 order in this proceeding, 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 (“MRTU”) process. The Commission also directed the CAISO to continue to file its weekly reports detailing the impacts of the “as-bid” settlement methodology.

III. DISCUSSION

In the course of preparing the report for the week of October 30 through November 5, 2005, the CAISO's DMM discovered that it was unable to retrieve from the CAISO's database all of the data necessary to perform the analyses contained in the report. It was subsequently determined that these data were inaccessible because of changes in the data correction process that the CAISO performs in order to produce transactional data for settlement purposes. Specifically, the CAISO has recently begun to perform this data correction process earlier, which has caused the relevant data to be inaccessible to DMM in the time-frame that DMM has adhered to in preparing the weekly "as-bid" reports.²

To address the impact on weekly reports, the CAISO has developed a solution that will provide DMM timely access to the necessary data, which will allow the CAISO to recommence filing the weekly reports under the same schedule as it did previously, beginning with the report for the week of November 27, 2005. Moreover, the CAISO will, at that time, also provide a report that includes analyses relating to the data for the weeks that the CAISO has been unable to file reports with the Commission (*i.e.* the data for October 22 through November 18) because of the issue described herein. The CAISO submits that no entity will be disadvantaged by granting this brief suspension because the CAISO will, when it resumes submitting the reports, also provide analyses

² The weekly reports have analyzed data relating to the period approximately one week prior to the filing of the reports. Thus, the most recent weekly report, filed on October 28, 2005, contained data for the period of October 15 through October 21, 2005.

relating to the data for the weeks that the reporting requirement will be suspended.

IV. CONCLUSION

For these reasons, the CAISO respectfully requests that the Commission grant a four-week suspension of the requirement that the CAISO submit a weekly report detailing the market effects of the “as bid” settlement methodology.

Respectfully submitted,

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Dated: November 16, 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 16th day of November, 2005 at Folsom in the State of California.

/s/ Sidney M. Davies

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