



achieve a joint resolution of the outstanding compensation issues in this proceeding. Based on the favorable response the ISO received from the parties with whom it spoke, on May 20, 2011, the ISO filed a motion requesting that the Commission grant a 30-day extension of the procedural schedule for the filing of initial post-technical conference comments and post technical conference reply comments. The Commission granted the ISO's motion for extension on May 23, 2011. Following then extension, the ISO conducted phone calls with representatives from each of the industry segments that are parties to the proceeding, and held a face-to-face meeting of the parties on June 8, 2011.<sup>2</sup> The discussions have been positive. As a result, at the end of the June 8 meeting, numerous parties requested that the ISO promptly file a request for an additional 30-day extension of time for the submission of initial and reply comments on the technical conference.

3. The ISO submits that additional time is needed in order to conduct these settlement discussions and attempt to reach a joint resolution of the outstanding issues with the parties. Accordingly, the ISO requests that the Commission grant the parties an additional 30-day extension of time to file initial and reply comments on the technical conference. Under such revised schedule, initial post technical conference comments would be due on July 27, 2011, and post technical conference reply comments would be due on August 15, 2011. Extending the comment filing dates for an additional 30 days will permit the parties to focus exclusively on resolution of the outstanding issues and should provide the parties with sufficient time to address such issues. Absent such an extension, the ISO and other parties will be forced to commit their limited resources

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<sup>2</sup> A second face-to-face meeting is scheduled for June 15.

to drafting comments and reply comments and focus on supporting their litigation positions, as opposed to focusing their efforts on reaching a settlement of the issues. Thus, adherence to the adopted comment dates would impinge on any meaningful opportunity for the ISO and the parties to engage in further discussions and reach a joint resolution of the issues in this proceeding. Granting the requested extension will benefit the parties to this proceeding, as well as the Commission, because it could facilitate an agreed-to resolution of the compensation issues and potentially avoid further and protracted litigation of these issues.

4. The ISO is authorized to state that the following parties support or do not oppose the proposed 30-day extension: California Municipal Utilities Association, Calpine Corporation, GenOn, Independent Energy Producers Association, NRG, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Six Cities, Southern California Edison Company, and Western Power Trading Forum. The ISO also notes that no party who attended the meeting in person or was on the phone at the time this issue was raised expressed an objection to an extension.

5. Until the Commission rules on this motion, the ISO and other parties must, out of necessity, work on their initial comments regarding the issues discussed at the technical conference. Accordingly, the ISO requests that the Commission (1) shorten the applicable period for responding to this motion and require that any responses or comments be submitted by June 10, 2011, and (2) expeditiously grant the instant motion by June 13, 2010 so that any unnecessary work can be avoided and the parties can continue to focus their efforts on developing a framework for resolving the outstanding issues in this proceeding.

## CONCLUSION

For the reasons set forth above, the CAISO respectfully requests that the Commission grant an additional 30-day extension of time for the filing of initial and reply comments on the technical conference in this proceeding.

Respectfully submitted,

**By: /s/ Anthony J. Ivancovich**

Nancy Saracino

General Counsel

Anthony J. Ivancovich

Assistant General Counsel

Beth Ann Burns

Senior Counsel

California Independent System

Operator Corporation

250 Outcropping Way

Folsom, CA 95630

Tel: (916) 351-4400

Fax: (916) 608-7296

Counsel for the California Independent  
System Operator Corporation

Dated: June 9, 2011

## 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 9<sup>th</sup> day of June, 2011, in Folsom, CA.

*Is/Anna Pascuzzo*

Anna Pascuzzo