

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

<b>California Independent System Operator Corporation</b>	) ) ) )	<b>Docket No. ER11-2256-000</b>
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**MOTION OF  
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION  
FOR EXTENSION OF TIME TO FILE POST-TECHNICAL CONFERENCE  
COMMENTS**

Pursuant to Rules 212 and 2008 of the Commission’s Rules of Practice and Procedure,<sup>1</sup> the California Independent System Operator Corporation (“ISO”) respectfully requests an additional extension of time until August 29, 2011 for filing initial post-technical conference comments and until September 15, 2011 for filing post-technical conference reply comments. In support of this motion, the ISO states as follows:

1. On April 28, 2011, the Commission held a technical conference to address, *inter alia*, issues designated by FERC staff related to the ISO’s proposed Capacity Procurement Mechanism compensation methodology, Exceptional Dispatch mitigation provisions, and eligibility of demand response to participate in the Resource Adequacy program. By Notice issued May 3, 2011, the Commission established May 27, 2011 as the date for the parties to file initial post-technical conference comments and June 15, 2011 as the date for filing post-technical conference reply comments.

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<sup>1</sup> 18 C.F.R. §§ 385.212 and 385.2008 (2011).

2. Subsequent to the technical conference, the ISO contacted several parties to this proceeding to see if there was any interest in the ISO convening a meeting and facilitating discussions among the parties in an attempt to achieve a joint resolution of the outstanding compensation issues in this proceeding. Based on the favorable response the ISO received, the ISO on May 20, 2011 filed a motion requesting a 30-day extension of the procedural schedule for the parties to file initial and reply comments on the technical conference in order to allow additional time to conduct these settlement discussions. On May 23, 2011, the Commission issued a notice granting an extension of time to file post-technical conference initial comments until June 27, 2011 and reply comments until July 14, 2011.

3. Following the extension, the ISO conducted phone calls with representatives from each of the industry segments that are parties to the proceeding, and initiated a series of face-to-face meetings and teleconferences to discuss settlement with all parties. On June 9, 2011, the ISO filed a motion requesting a second extension of time. The ISO stated that it had engaged in positive discussions with the parties, but that additional time was required to conduct the settlement discussions and attempt to reach a joint resolution of the outstanding issues. On June 14, 2011, the Commission issued a notice that granted all parties an extension of time to file post-technical conference initial comments until July 27, 2011 and reply comments until August 15, 2011.

4. The ISO requests that the Commission grant an additional extension of time for the parties to submit post-technical conference comments. In support of this request, the ISO is authorized to state that the parties have reached an agreement in

principal on the terms of settlement for the Capacity Procurement Mechanism compensation issue. The parties that participated in the settlement discussions on July 8, 2011 provided this authorization to the ISO and support the requested extension. Those parties include: California Public Utilities Commission, California Department of Water Resources – State Water Project, GenOn, Independent Energy Producers Association, Northern California Power Authority, NRG Energy, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Six Cities, Southern California Edison, and Western Power Trading Forum. No party expressed opposition to filing a motion to request an extension of time for filing comments.

5. Extending the comment filing dates by approximately 30 days will afford the parties time needed to draft the settlement documents and engage in further discussions. The requested extension is expected to result in an agreed-to resolution of the compensation issues, and potentially all outstanding issues from the technical conference. Granting the extension will thereby benefit the parties to this proceeding, as well as the Commission, and may avoid further and protracted litigation of the issues. Under such a revised schedule, initial post-technical conference comments would be due on August 29, 2011 and reply comments would be due on September 15, 2011.

6. Until the Commission rules on this motion, the ISO and other parties must, out of necessity, begin drafting their initial comments on 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 July 25, 2011, and (2) expeditiously grant the instant motion no later than July 26, 2010 so that any unnecessary work can be avoided and the

parties can focus their efforts on developing a framework for resolving, and undertaking discussions to resolve, the outstanding issues in this proceeding.

## **CONCLUSION**

For the reasons set forth above, the ISO respectfully requests that the Commission grant the requested extension of time for the filing of initial and reply comments on the technical conference in this proceeding.

Respectfully submitted,

**/s/ Anna A. McKenna**

Nancy Saracino  
General Counsel  
Anna A. McKenna  
Acting 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: July 21, 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 21st day of July, 2011, in Folsom, CA.

*Anna Pascuzzo*  
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