

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

**California Independent System) Docket No. ER08-1317-____
Operator Corporation)**

**MOTION FOR EXTENSION OF TIME OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR TO
SUBMIT TRANSITION CLUSTER REPORT AND TO
CONSOLIDATE WITH NEXT QUARTERLY REPORT**

I. Introduction

The California Independent System Operator Corporation (the ISO) respectfully submits this motion for an extension of time until January 30, 2011 to submit the report on the ISO's experience in conducting the transition cluster study process and to consolidate such report with the ISO's Q4 2010 quarterly interconnection progress report. Both reporting requirements stem from the Commission's September 2008 order conditionally accepting the ISO's 2008 Generator Interconnection Process Reform (GIPR) Large Generation Interconnection Process (LGIP) tariff amendment. As the Commission will recall, the 2008 GIPR amendment established the cluster study process methodology for large generator interconnection requests.¹

The Commission's September 2008 order accepted the ISO's cluster study process under the GIPR Amendment but imposed three reporting requirements. The Commission directed the ISO to file quarterly reports on the processing of the queue clusters and also directed the ISO to file two

¹ The ISO makes this request pursuant to Pursuant to Rules 212 and 2008(a) of the Commission's Rules of Practice (18 C.F.R. §§ 385.212, 385.2008(a) (2010).)

comprehensive status updates.² The first status update relates to the processing of the transition cluster, with a filing date set for 60 days following completion of the Phase II Study phase.³ The second comprehensive report relates to the initial GIPR cluster (which the ISO calls the First Queue Cluster), with a filing date for 60 days following completion of the Phase II Interconnection Study for that cluster.⁴

The ISO has filed eight quarterly reports, beginning with its Q4 2008 report, and the next quarterly report that is due is the Q4 2010 quarterly report, due January 30, 2011. The ISO concluded its Phase II Interconnection Study Process for the transition cluster with a final revised Phase II study report issued on November 18, 2010 resulting in a January 18, 2011 due date for the comprehensive report of the transition cluster. The ISO respectfully requests that the Commission extend the date for filing this report to January 30, 2011 and to allow the ISO to combine the transition cluster report with its Q4 2010 report, as there is an overlap of subject matter for the reports.⁵

II. There is Good Cause for Granting the ISO an Extension of Time

In general, the ISO was able to accelerate distribution of the initial Phase II study reports for the transition cluster, an action that the ISO and the participating transmission owners committed to do as a method to accommodate projects seeking federal stimulus funding under the American Recovery and

² *Cal. Indep. Sys. Operator Corp.*, 124 FERC ¶ 61,292 (September 26, 2008), PP 200-203.

³ *Id.* at P 201.

⁴ *Id.* at P 202.

⁵ The anticipated time for completion of the Phase II Interconnection Study process for the first queue cluster is on or about December 1, 2011, which would make the second comprehensive report due on or about January 29, 2012.

Reinvestment Act of 2009 (commonly called "ARRA"). However, as this was the first time the ISO and the participating transmission owners had undertaken a Phase II study process, some revisions of individual interconnection customer reports was necessary. In general, these revisions fall into two categories: i) minor or technical changes to the study report or ii) more extensive changes that either increased the interconnection customer's Phase II study cost responsibility listing or changed the in-service date of the transmission upgrades in a way that affects the proposed commercial operation date of the interconnecting generating facility. The ISO's last revision of a Phase II study report was made on November 18, 2010, and the ISO considers this to be the end point of the transition cluster Phase II Interconnection Study phase for purposes of triggering the 60-day comprehensive report for the transition cluster.

As the Commission is aware, many issues have arisen during the processing of the transition cluster, including the passage of ARRA, an increase in the California Renewables Portfolio Standard from 20 to 33 percent and a change in economic conditions beginning about September 2008 when the GIPR Amendment was accepted. The ISO has apprised the Commission of some of these developments through the 2009 GIPR Amendment, the ISO's June 2010 tariff waiver request, and the recent filing of several non-conforming pro forma LGIAs. The ISO remains extremely busy processing the LGIAs and requests further time to prepare the comprehensive report, which will address these matters. Moreover, because of the overlap of subject matter between the Q4

2010 report and the status report, there are efficiencies in combining the two reports into a single report.

III. Conclusion

For the above-stated reasons, the ISO requests that the Commission extend the date for filing of the comprehensive status update report for the transition cluster to January 30, 2011 and to allow the ISO to combine the report with its Q4 2010 report on progress in processing the interconnection queue.

Respectfully submitted,

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Dated: December 23, 2010

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 December, 2010
at Folsom in the State of California.

/s/ Anna Pascuzzo
Anna Pascuzzo