

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

**Cities of Anaheim, Azusa, Banning, and            )    Docket No. EL03-7-000  
Riverside, California                                    )**

**JOINT MOTION OF PETITIONERS AND INDICATED ENTITIES  
FOR EXTENSION OF TIME TO FILE PROTESTS OR  
SUBSTANTIVE COMMENTS**

Pursuant to Rules 212 and 2008 of the Commission’s Rules of Practice and Procedure, 18 CFR §§385.212 and 385.2008, the Cities of Anaheim, Azusa, Banning, and Riverside, California (“Southern Cities”), petitioners in the above-referenced proceeding, the California Independent System Operator Corporation (“ISO”), the Pacific Gas and Electric Company, the Southern California Edison Company, the San Diego Gas & Electric Company, and the City of Vernon, California (collectively, the “Moving Parties”)<sup>1</sup> hereby request that the Commission extend the previously established time for filing protests and/or substantive comments regarding the Southern Cities’ October 4, 2002 filing in this docket by ten business days, to and including November 14, 2002, to allow the Moving Parties additional time to attempt to reach a negotiated resolution of this docket.

The Southern Cities initiated this docket by filing on October 4, 2002 a Petition for Declaratory Order, Request for Expedited Procedures, and Request for Waiver of

---

<sup>1</sup> The undersigned counsel for the Southern Cities has been authorized by counsel for each of the entities identified in the text as Moving Parties to state that such entity joins in this Motion.

Filing Fee (“Petition”). The Commission issued a Notice of Filing on October 10, 2002 establishing October 31, 2002 as the date for filing motions to intervene and protests of the Southern Cities’ Petition. The ISO submitted a motion to intervene in this proceeding on October 25, 2002, and the Pacific Gas and Electric Company submitted a motion to intervene on October 29, 2002.

Subsequent to the filing of the Southern Cities’ Petition, the Moving Parties have continued discussions regarding the Southern Cities’ proposal for provisions in the Transmission Control Agreement (the agreement by which Participating Transmission Owners in the ISO transfer Operational Control of their transmission facilities and entitlements to the ISO) that would allow the Southern Cities to withdraw their transmission facilities and entitlements from ISO control if necessary to preserve the tax exempt status of the bonds that financed the acquisition of their facilities or entitlements. The Moving Parties believe that they have made significant progress toward agreement on provisions that would resolve this docket. Additional time is necessary, however, to permit the Moving Parties to conclude their discussions with respect to the matters addressed in the Southern Cities’ Petition and to prepare appropriate submissions to the Commission. The Moving Parties therefore request that the Commission extend by ten business days, to and including November 14, 2002, the time allowed for submission of

protests and/or substantive comments in response to the Southern Cities' Petition. The Moving Parties also respectfully request expedited action with respect to this Motion.

Respectfully submitted,

---

Bonnie S. Blair  
Attorney for the Cities of Anaheim, Azusa,  
Banning, and Riverside, California

Law Offices of:

Thompson Coburn LLP  
Suite 600  
1909 K Street, N.W.  
Washington, D.C. 20006-1167  
202-585-6900

October 29, 2002

## **CERTIFICATE OF SERVICE**

I hereby certify that I have on this 29th day of October, 2002, caused a copy of the foregoing document to be sent by first-class mail to all parties on the list compiled by the Secretary of the Commission in this proceeding.

---

Bonnie S. Blair  
Attorney for the Cities of Anaheim, Azusa,  
Banning, and Riverside, California

Law Offices of:

Thompson Coburn LLP  
Suite 600  
1909 K Street, N.W.  
Washington, D.C. 20006-1167  
202-585-6900