

200203075037 Received FERC OSEC 03/07/2002 03:21:00 PM in Docket#: ER02-91-000



CALIFORNIA ISO

California Independent
System Operator

March 7, 2002

The Honorable Magalie Roman Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

**Re: Williams Energy Marketing & Trading Company
Docket No. ER02-91-000**

Dear Ms. Salas:

Enclosed for filing in the above-captioned proceeding, please find an original electronic filing of the attached document entitled: "Joint Motion for a one week extension of time to file protests of the California Independent System Operator Corporation, Southern California Edison Company, the California Public Utilities Commission, the California Electricity Oversight Board, AES Southland, LLC, and Williams Energy Marketing & Trading Company".

Respectfully submitted,

Jeanne M. Solé
Counsel for the California Independent
System Operator Corporation

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

**Williams Energy Marketing) Docket No. ER02-91-000
& Trading Company)**

**JOINT MOTION FOR A ONE WEEK EXTENSION OF TIME TO FILE
PROTESTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION, SOUTHERN CALIFORNIA EDISON COMPANY, THE
CALIFORNIA PUBLIC UTILITIES COMMISSION, THE CALIFORNIA
ELECTRICITY OVERSIGHT BOARD, AES SOUTHLAND, LLC, AND
WILLIAMS ENERGY MARKETING & TRADING COMPANY**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. § 385.212, the California Independent System Operator Corporation, Southern California Edison Company, the California Public Utilities Commission, the California Electricity Oversight Board, AES Southland, LLC, and Williams Energy Marketing & Trading Company ("Williams") (collectively, "the Parties") jointly move for a one week extension of time to file protests in the above-captioned proceeding. The Parties seek a time extension to complete discovery, continue settlement negotiations and prepare and submit protests to Williams' Schedule F Informational Filing.

On January 28, 2002, the Parties filed an unopposed joint motion setting forth a proposed revised procedural schedule as follows:

Intervenor Data Requests	February 1, 2002
Williams Data Responses	February 22, 2002

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Informal Data/Settlement Conference March 1, 2002

Intervenor Protests March 15, 2002

On February 6, 2002, the Commission granted the unopposed, joint motion and adopted the revised procedural schedule.

Since the joint unopposed motion was filed, the Parties have exchanged information and have begun to explore settlement options. The Parties expect, in the next few weeks, to arrive at a significantly better understanding of whether a settlement will be possible. To allow the Parties to continue to focus their limited resources on exploring settlement options, the Parties seek a one week extension for the filing of intervenor protests to March 22, 2002.

The Parties aver that the extension requested is in the public interest as it will allow them to focus their limited resources on exploring settlement options and will likely narrow -- if not eliminate -- areas of disagreement over Williams' Schedule F Information Filing. No party will be prejudiced by Commission approval of the instant joint motion.

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Wherefore, in view of the foregoing, the Parties respectfully and jointly request that the Commission grant the requested extension of time.

Respectfully submitted,

Dated: March 7, 2002

 Jeanne M. Solé
 The California Independent System
 Operator Corporation
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Folsom, California on this 7th of March 2002.

Jeanne M. Solé
The California Independent System
Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630

