

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

**California Independent System  
Operator Corporation**

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**Docket Nos. ER98-1499-000 et al.**

**MOTION OF THE CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR CORPORATION FOR EXTENSION OF TIME  
TO PREPARE COMPLIANCE FILING**

Pursuant to Rules 212 and 2008 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission, 18 C.F.R. § 385.212 and § 385.2008 (1999), the California Independent Operator Corporation (“ISO”) respectfully requests that the Commission grant an extension of the time permitted for it to make its filing in compliance with the Order of February 24, 2000 in the above-captioned proceeding. In support of this motion, the ISO states as follows:

1. On September 10, 1999, the ISO filed an Offer of Settlement (“Settlement”) in the above-captioned matter. The Settlement relates to the ISO’s Meter Service Agreement for Scheduling Coordinators (“MSA/SC”) and the Meter Service Agreement for ISO Metered Entities (“MSA/ISOME”) (together, “MSAs”) which are the subject of these consolidated dockets. The MSA/SC is designed to establish the terms and conditions on which a Scheduling Coordinator shall provide Settlement Quality Meter Data for the metered entities that it represents to the ISO’s revenue meter data acquisition and processing system.<sup>1</sup> The MSA/ISOME is designed to establish the

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<sup>1</sup> Capitalized terms not otherwise defined herein are used in the sense given in the Master Definitions Supplement, Appendix A to the ISO Tariff.

terms and conditions upon which the ISO shall certify the data for the ISO Metered Entities.

2. The uncontested Settlement was certified to the Commission on October 18, 1999. In a letter order dated February 24, 2000 ("February 24 Order"), the Commission approved the Settlement and required the ISO to execute and file revised MSAs, consistent with Article 1.1 of the Settlement, within thirty (30) days of the order (i.e., by March 27, 2000). Article 1.1 reads: "The ISO and the respective Market Participant shall execute a revised MSA/SC to be fully consistent with the revised pro forma MSA/SC attached to this Offer of Settlement as Attachment A." A parallel section, Article 1.4, provides for similar treatment for each MSA/ISOME.

3. In order to comply with the Commission's requirements in its February 24 Order, the ISO will have to revise, prepare blackline versions, and execute at least 85 separate agreements with approximately 77 separate entities. Despite the fact that these entities are supportive of the Settlement, complying with the Commission's Order in the time allowed would be an extremely difficult task, even if the ISO and the other parties had no other work before them.

4. In fact, the ISO has many tasks that currently require its attention. For example, on the same day that the Commission approved the MSA settlement, the Commission approved an offer of settlement in Docket No. ER98-992-000, et al., concerning the ISO's Participating Generator Agreement ("PGA"). In compliance with this order, the ISO must prepare revised versions and blacklined pages of approximately fifty separate PGAs and send them for execution. Many of the same personnel at the ISO are required to prepare both the MSA and PGA compliance filings.

Also on February 24, 2000, the Commission accepted the offer of settlement in Docket No. ER93-3760-000 concerning hundreds of “Unresolved Issues”. The ISO must make a compliance filing updating the tariff pages modified in that settlement. Furthermore, the ISO must respond to over 1200 pages of initial briefs addressing more than 100 remaining topics in the Unresolved Issues proceeding, as well. In addition, the ISO currently is undertaking an involved study of its Congestion Management process, as it was instructed to do by the Commission in the January 7, 2000, order on Amendment No. 23 to the ISO Tariff.<sup>2</sup> As well, the ISO is involved in several Reliability Must-Run (“RMR”) hearings taking place at FERC this month, as well as in other ongoing proceedings.

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<sup>2</sup> California Independent System Operator Corporation, 90 FERC ¶ 61,006 (January 7, 2000)

5. The ISO therefore requests a forty-five (45) day extension of time to make its filing in compliance with the Commission's order of February 24.<sup>3</sup> Such an extension would enable the ISO to prepare the revised agreements, send them to the other parties for execution, and combine them into a single filing for ease of processing by the Commission. For all the foregoing reasons, the ISO requests that the Commission grant this motion and permit the ISO to make its compliance filing in this proceeding by May 11, 2000.

Respectfully Submitted,

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Dated: March 8, 2000

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<sup>3</sup> This period of extension is all the more reasonable in light of the fact that the Commission has given the ISO 120 days to submit its filing in compliance with the Commission's order on Participating Generator Agreements, issued the same day as the letter order concerned here, in Docket No. ER98-992-000 et al. (referenced above).

## **CERTIFICATE OF SERVICE**

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

Dated at Washington, DC, this 8<sup>th</sup> day of March, 2000.

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Julia Moore

March 8, 2000

The Honorable David P. Boergers  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

**Re: California Independent System Operator Corporation,  
Docket Nos. ER98-1499-000, et al.**

Dear Secretary Boergers:

Enclosed for filing are one original and 14 copies of the Motion for Extension of Time of the California Independent System Operator Corporation in the above-referenced proceeding. Two additional copies of the filing are also enclosed. Please stamp the two additional copies with the date and time filed and return them to the messenger.

Thank you for your assistance in this matter.

Respectfully submitted,

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