

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

<b>California Independent System Operator Corporation</b>	)	<b>Docket Nos. ER06-615-011 ER06-615-012</b>
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**MOTION OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
CORPORATION FOR EXTENSION OF TIME**

Pursuant to Rules 212 and 2008(a) of the Federal Energy Regulatory Commission's (the "Commission") Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, 385.2008(a) (2007), the California Independent System Operator Corporation ("CAISO")<sup>1</sup> respectfully requests an extension of time until June 6, 2008, in the above captioned proceeding to submit a filing to comply with Paragraphs 68 and 69 of the March 24, 2008, Commission order.<sup>2</sup> This will enable the CAISO to submit additional changes to the same parts of the Congestion Revenue Rights ("CRR") tariff rules concurrently with the necessary provisions to comply with paragraphs 68 and 69.<sup>3</sup> The requested extension enables the CAISO to combine the two required filings, which will ensure consistency between the various tariff changes, provide administrative efficiency, and eliminate any confusion that would otherwise result from the submission in rapid succession of multiple filings affecting the same tariff sections.

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings set forth in the Master Definitions Supplement, Appendix A to the ISO Tariff.

<sup>2</sup> *California Indep. Sys. Operator Corp.*, 122 FERC ¶ 61,271 (2007) ("March 24 Order").

<sup>3</sup> *California Indep. Sys. Operator Corp.*, 119 FERC ¶ 61,313 (2007) ("June 25 Order").

## I. Background

Under the CAISO MRTU Tariff, certain types of outages are subject to the “30-day Rule,” which requires participating transmission owners to submit for approval all planned outages that may have a significant effect upon CRR revenue adequacy thirty days in advance of the first day of the month the Outage is proposed to be scheduled.<sup>4</sup> In its September 21 MRTU Order, the Commission approved tariff changes subject to additional modifications to be submitted in a compliance filing, in which the CAISO proposed to modify its transmission maintenance outage scheduling requirements to: (1) specify in its tariff that advance scheduling is only required for those transmission outages that have a “significant” impact on CRR revenue adequacy; and (2) modify the advance notice requirements from 45 days to 30 days in advance of the first day of the month when the outage is scheduled.<sup>5</sup> The CAISO also stated that the criteria for determining what constitutes a “significant” impact on CRR revenue adequacy would be developed with stakeholders and incorporated into a Business Practice Manual (“BPM”).<sup>6</sup> Subsequently, the CAISO proceeded to develop the criteria for determining what constitutes a “significant” impact on CRR revenue adequacy with its stakeholders and incorporated the criteria in its BPMs for Outages and for CRRs.

The Western Power Trading Forum (“WPTF”) subsequently submitted comments as part of the BPM technical conference process arguing that the 30-

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<sup>4</sup> See Section 9.3.6.3.2 of the MRTU Tariff.

<sup>5</sup> See *Cal. Indep. Sys. Operator Corp.*, 116 FERC ¶ 61,274 at 1335 and 1336 (2006) (“September 21 Order”).

<sup>6</sup> See September 21 Order at P 1333.

day Rule exemption policies found in section 10.3.1 of the BPM for CRRs (titled “Monthly Outage Methodology for Reporting Exceptions to 30 Day Outage Rule”) should be included in the MRTU tariff. WPTF argued that the CAISO’s proposed process for granting exemptions to the 30-day rule has the potential to affect congestion charges, CRR charges and payments, and the balance of power between certain market participant customer classes, *i.e.*, participating transmission owners versus non-participating transmission owners. The Commission granted WPTF’s request that the CAISO be required to include in the MRTU tariff the 30-day rule exemption policies found in section 10.3.1 of the BPM for CRRs.<sup>7</sup>

## **II. Motion for Extension of Time**

As required by Rule 2008(a), good cause exists to grant the CAISO the extension of time requested in the instant motion. In anticipation of the second annual CRR auction and allocation, which will occur later this summer, CAISO initiated a stakeholder process to propose tariff amendments designed to enhance current CRR policies and to address the delay in the MRTU planned start date. In this stakeholder process the CAISO considered a number of CRR rules enhancements including whether to expand the exemption of the 30-day Rule as reflected in its BPM for CRRs so that instead of limiting the exemption to outages that occur within a single calendar day it would apply to the 24 hour period. The CAISO also engaged with stakeholders concerning whether additional exemptions should be recognized.

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<sup>7</sup> See March 24 Order at PP 68-69.

Prior to the March 24 Order the CAISO did not anticipate the need to file the proposed rule changes to exemptions to the 30-day Rule, which the CAISO had previously anticipated would reside in the BPMs. The March 24 Order, however, rendered it necessary to consider the tariff impacts of the proposed rule changes. While the CAISO has now obtained approval by the Board of Governors of the complete package of proposed CRR enhancements, it has not yet completed its stakeholder review of the tariff language. The same tariff language affected by the need to include the detail in Section 10.3.1 of the BPM for CRRs into the Tariff will be affected by the CRR enhancements. Filing the detail in Section 10.3.1 of the BPM for CRRs (titled “Monthly Outage Methodology for Reporting Exceptions to 30 Day Outage Rule”) on May 23, 2008, the due date for compliance with the March 24 Order, would be inappropriate because shortly after that the CAISO would again be submitting proposed tariff changes modifying the same tariff language. Therefore, the CAISO respectfully requests a modest extension of time of 14 days until June 6, 2008, to comply with the requirement that the exemptions to the 30-day Rule be included in the Tariff as required in Paragraphs 68 and 69 of the March 24 Order. This will allow the CAISO to submit its compliance filing at the same time it makes its additional tariff changes to implement the CRR enhancements. Combining these two filings will ensure consistency between the various tariff changes, provide administrative efficiency, and eliminate any confusion that would otherwise result from multiple filings in rapid succession proposing changes to the same tariff language.

### III. Conclusion

For the reasons explained above, the CAISO requests that the Commission grant this motion for extension of time.

Respectfully submitted,

*/s/ Anna McKenna*

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Dated: May 23, 2008

## CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 23rd day of May, 2008.

*1st Anna M. Pascuzzo*  
Anna M. Pascuzzo