

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

Operational Audit of the California) Docket No. PA02-1-000
Independent System Operator)

MOTION FOR RELIEF FROM PAGE LIMIT FOR COMMENTS

Pursuant to Rules 212 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 (2001), the California Independent System Operator Corporation ("ISO") hereby submits its Motion for Relief From Page Limit For Comments on the Vantage Consulting, Inc. report "Operational Audit of the California Independent System Operator" ("Audit Report"), as set forth in the "Notice of Filing and Requests for Comments" ("Notice"), issued on January 25, 2002, in the above-captioned docket. The Notice specifically limits comments to twenty (20) pages.

For the reasons described below, the ISO respectfully submits that good cause exists for permitting the ISO to file comments that exceed the Notice's page limit.

Granting permission to the ISO to file a longer comment is warranted, because the Audit Report contains 106 pages of findings and observations specific to the ISO which the ISO cannot meaningfully respond to in only (twenty) 20 pages. The significance of the Audit Report is such that the ISO, the sole subject of the report, should be able to offer reasonable detail in its comments on any descriptive or factual misstatements, inaccuracies, conclusions and the extensive recommendations. It is therefore reasonable to grant to the ISO some reasonable leeway in filing succinct but complete comments to assist the Commission in assessing the

Audit Report and determining how best to incorporate that report into the Commission's directives to the ISO.

For these reasons, the ISO submits that good cause exists to warrant a grant of relief from the twenty (20) page length for comments and permit the ISO to exceed that length by a reasonable amount as needed to ensure that the Commission has the benefit of comprehensive comments from the subject of the report.

WHEREFORE, the ISO respectfully requests that the page length for comments from the ISO be waived.

Respectfully submitted,

Margaret A. Rostker
Counsel for The California Independent
System Operator Corporation
151 Blue Ravine Road
Folsom, California 95630
(916) 608-7147

Dated: February 13, 2002



February 13, 2002

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

**Re: Operational Audit of the California Independent System Operator Corporation
Docket No. PA02-1-000**

Dear Secretary Salas:

Enclosed for electronic filing please find The California Independent System Operator Corporation's Motion for Relief from Page Limit for Comments in the above-captioned docket.

Thank you for your assistance in this matter.

Respectfully submitted,

Margaret A. Rostker
Counsel for The California Independent
System Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
(916) 608-7147

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 the above-captioned dockets.

Dated at Folsom, CA on this 13th day of February, 2002.

Margaret A. Rostker
Counsel for the California Independent
System Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630