

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

**Standardization of Small Generator      )      Docket No. RM02-12-000  
Interconnection Agreements and      )  
Procedures                              )**

**MOTION OF THE CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR FOR AN EXTENSION OF TIME TO FILE  
COMPLIANCE FILINGS**

Pursuant to Rule 212 of the Federal Energy Regulatory Commission (“FERC” or “Commission”) Rules of Practice and Procedure, 18 C.F.R. § 385.212 (2004), the California Independent System Operator Corporation (“CAISO”) hereby files this Motion for Extension of Time to File Compliance Filings to request that the due date of the compliance filings required by the Commission’s May 12, 2005 order on Standardization of Small Generator Interconnection Agreements and Procedures, issued in Docket No. RM02-12-000, as described in the body of this Motion, be extended from November 10, 2005 to February 6, 2006.<sup>1</sup>

**I. MOTION FOR EXTENSION OF TIME**

On May 12, 2005, the Commission issued its Final Rule on Standardization of Small Generator Interconnection Agreements and Procedures in Docket No. RM02-12-000 (“Order No. 2006”).<sup>2</sup> Therein, the Commission adopted *pro forma* Small Generator Interconnection Procedures (“SGIP”), and a *pro forma* Small Generator Interconnection

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<sup>1</sup> The CAISO has consulted with San Diego Gas & Electric Company, Southern California Edison and Pacific Gas and Electric Company regarding this request. None of the entities expressed opposition to the extension.

<sup>2</sup> 111 FERC ¶ 61,220 (2005).

Agreement (“SGIA”), and stated that all public utilities that own, control, or operate interstate transmission facilities must adopt the SGIP and SGIA. As with the *pro forma* Large Generator Interconnection Procedures (“LGIP”) and Agreement (“LGIA”), however, the Commission provided that ISOs and RTOs would be permitted to propose “independent entity” variations from the SGIP and SGIA. The Commission stated that any ISOs and RTOs that wished to seek such variations from the SGIP and SGIA would have a total of 150 days from the effective date of Order No. 2006 (the standard 60 days from publication in the Federal Register, plus an additional 90 days) to submit a compliance filing containing the proposed variations. Thus, the CAISO’s SGIP and SGIA compliance filings will be due on November 10, 2005.<sup>3</sup>

The CAISO respectfully requests that the Commission grant it a 90 day extension to make the compliance filings required by Order No. 2006. This extension is warranted for several reasons. First, the CAISO believes that it is very important that it incorporate stakeholder input in developing the SGIP and SGIA compliance filings. Indeed, the primary reason that the Commission afforded ISOs and RTOs an additional 90 days to make the required compliance filing in Order No. 2006 was in order to allow these entities the opportunity to engage in a stakeholder process to develop any proposed variations to the SGIP and SGIA. As the Large Generating Facility interconnection process has demonstrated, there will be many issues regarding the SGIP and SGIA that the CAISO and Market Participants will need to address. The CAISO and its Market Participants were able to resolve most of the issues relating to the LGIP and LGIA prior

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<sup>3</sup> As with the LGIP and LGIA filings, the CAISO intends to file the SGIP on its own, and to file the SGIA jointly with several of its Participating Transmission Owners.

to filing those documents, and the CAISO believes that a similar stakeholder process will yield the same results with respect to the SGIP and SGIA.

Because of several other important stakeholder initiatives, however, the CAISO has not yet had an opportunity to conduct a stakeholder process to develop proposed variations to the SGIP and SGIA. As the Commission is well aware, over the past two months, the CAISO and a number of its Market Participants have been heavily involved in a stakeholder process to develop a centralized Interconnection Study process for inclusion into the LGIP and LGIA.<sup>4</sup> The CAISO is due to file this new study process with the Commission by October 14, 2005. In addition, the CAISO has also been conducting an extensive stakeholder initiative as part of its ongoing Market Redesign and Technology Upgrade (“MRTU”) process. This stakeholder process has been particularly active of late, as the CAISO attempts to finalize issues in order to make its November, 2005 tariff filing in the MRTU proceeding,<sup>5</sup> which will address a number of the key MRTU features. Because of these commitments, the CAISO does not anticipate being able to commence a stakeholder process focused on developing the SGIP and SGIA compliance filings until approximately the end of November 2005 or thereafter.

Moreover, the CAISO is hopeful that with a 90-day extension, the Commission will have had an opportunity to act on the CAISO’s October 14<sup>th</sup> filing of the centralized Interconnection Study process for Large Generating Facilities. Although this new study

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<sup>4</sup> The Commission ordered the CAISO to develop a centralized study process in its July 1, 2005 order in Docket Nos. ER04-445, et al, 112 FERC ¶ 61,009 at PP 55-57 (2005) (“July 1 Order”). The Commission clarified certain aspects of process in its August 2, 2005 order in these same dockets, and directed the CAISO to file the new study process by October 14, 2005.

<sup>5</sup> Docket Nos. ER02-1656, et al.

process mainly concerns Large Generating Facility interconnections, Commission guidance on the centralized study process will be instructive in developing the SGIP and SGIA, because, pursuant to Order No. 2006, a Small Generating Facility interconnection can potentially involve many of the same studies as a Large Generating Facility interconnection.<sup>6</sup> Thus, if the CAISO is able to incorporate the results of a Commission decision on the centralized study process into the development of the SGIP and SGIA, that process will be both more efficient and certain.

Finally, the CAISO submits that no parties will be prejudiced by the requested extension of time. Pursuant to the July 1 Order, any intervening requests for interconnection from projects that meet the definition of Small Generating Facilities will be handled under the CAISO's pre-existing interconnection procedures, now set forth in Appendix W to the CAISO Tariff.<sup>7</sup> Given that the Commission already determined that such procedures are just and reasonable as applied to Small Generating Facilities, there is no reason to believe that a 90 day extension in filing the SGIP and SGIA will result in any harm to Interconnection Customers. Moreover, as the Commission noted in the July 1 Order, "if any Small Generator believes that CAISO is treating it in an unduly discriminatory manner, it can file a complaint . . . under section 206 of the FPA."

*Id.*

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<sup>6</sup> See Section 3 of the Commission's *pro forma* SGIP.

<sup>7</sup> July 1 Order at P 147.

## **II. CONCLUSION**

For the foregoing reasons, the Commission should grant this Motion and permit the CAISO an additional 90 days to make its SGIP and SGIA compliance filings.

Respectfully submitted,

*/s/ Grant Rosenblum*

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October 5, 2005



October 5, 2005

**Via Electronic Filing**

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

**Re: California Independent System Operator Corporation  
Docket No. RM02-12-000**

Dear Secretary Salas:

Enclosed please find an electronic filing of Motion of the California Independent System Operator Corporation for an Extension of Time to File Compliance Filings.

Thank you for your attention to this filing.

Respectfully submitted,

**/s/ Grant Rosenblum**  
Grant Rosenblum

Counsel for the California Independent  
System Operator Corporation

## **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, this 5th day of October, 2005.

*/s/ Grant Rosenblum*

Grant Rosenblum