

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

California Independent System                    )  
Operator Corporation                            )     Docket Nos. ER06-615-002

**MOTION FOR TWO DAY EXTENSION OF TIME  
TO FILE COMMENTS ON SEAMS ISSUES**

On September 21, 2006, the Commission issued an order in this proceeding conditionally approving the tariff to implement the Market Redesign and Technology Upgrade (“MRTU”) initiative of the California Independent System Operator Corporation (“CAISO”).<sup>1</sup> In the September 21 MRTU Order, the Commission directed the “Commission staff to convene a technical conference to assist the CAISO and parties outside the CAISO Control Area to identify seams issues that require resolution.”<sup>2</sup> On October 24, 2006, the Commission issued a Notice of Technical Conference (“October 24 Notice”) in this proceeding scheduling the conference on seams issues for December 14-15, 2006, in Phoenix, Arizona. The October 24 Notice encouraged participants to file comments on or before November 15, 2006, identifying operational seams issue (with quantitative examples) and possible solutions for discussion at the technical conference.<sup>3</sup>

Pursuant to Rules 212 and 2008 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, 385.2008, the CAISO hereby moves for a two day extension of time to submit comments on seams issues for discussion at the December

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<sup>1</sup> *California Independent System Operator Corp.* 116 FERC ¶ 61,274 (2006) (“September 21 MRTU Order”).

<sup>2</sup> *Id.* at P 490.

<sup>3</sup> “Participants are encouraged to file comments with the Commission on or before November 15, 2006 that identify specific alleged operational seams issues (particularly quantitative examples) and possible solutions for discussion at the conference. These comments should be filed in Docket No. ER06-615-002.” October 24 Notice.

14-15 technical conference. With the requested extension, the CAISO will file its comments by November 17, 2006.

Rule 2008(a) states that “[e]xcept as otherwise provided by law, the time by which any person is required or allowed to act under any statute, rule, or order may be extended by the decisional authority for good cause.” To determine if good cause exists for granting a request for an extension of time, the Commission will review the facts surrounding the request.<sup>4</sup>

Good cause exists for the Commission to grant the extension of time requested here. Due to a confluence of events, including work on pending compliance filings, ongoing stakeholder commitments, and internal administrative obligations, key members of the CAISO staff will need additional time to develop the CAISO’s comments on seams issues for consideration at the December 14-15, 2006, technical conference. The requested extension of time will permit the CAISO to submit a more fully-developed set of comments on seams issues for discussion at the technical conference. The CAISO believes that interested parties will benefit from a better set of CAISO comments and that the modest two day extension of time will not adversely affect the ability of Commission staff or interested parties to consider the CAISO’s comments in advance of the technical conference next month. In addition, although the CAISO is only requesting an extension on its own behalf, the CAISO has no objection to the Commission granting a two day extension for all other interested parties.

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<sup>4</sup> *Salt Lake County Water Conservancy District*, 31 FERC ¶ 61,201, at 61,413 (1985).

**CONCLUSION**

Wherefore, for the reasons discussed above, the CAISO respectfully asks that the Commission grant the requested two day extension of time for the submittal of comments on seams issues in this proceeding in accordance with the Commission's October 24 Notice.

Respectfully submitted,

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Dated: November 14, 2006

### **Certificate of Service**

I hereby certify that I have this day served a copy of this document upon all parties listed on the official service list compiled by the Secretary in the above-captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated this 14<sup>th</sup> day of November, 2006 at Folsom in the State of California.

/s/ Sidney M. Davies

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