

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

California Independent System Operator Corporation)))	Docket Nos. EL08-88-000, ER08-1178-000, and ER09-213-000
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**JOINT MOTION FOR EXTENSION OF TIME
OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
AND WESTERN POWER TRADING FORUM
TO FILE REPLY COMMENTS**

Pursuant to Rules 212 and 2008(a) of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or “Commission”), 18 C.F.R. §§ 385.212, 385.2008(a), the California Independent System Operator Corporation (“CAISO”) and Western Power Trading Forum (together, “Movants”) respectfully submit this joint motion for an extension of the current December 2, 2008, due date for the parties in the above-referenced proceedings to submit their reply comments in these proceedings. Specifically, the Movants request a one-week extension such that the new due date for reply comments would be December 9, 2008. Granting this extension is appropriate because, as explained below, it would be helpful for the parties to have more time to consider and respond to initial comments given the important issues at stake in these proceedings. Moreover, because the February 1, 2009 “go-live” date for the CAISO’s Market Redesign and Technology Upgrade (“MRTU”) is no longer feasible, the requested extension will not impair the Commission’s goal of addressing its concerns regarding the CAISO’s Exceptional Dispatch proposal prior to implementation of MRTU.

I. Background

On June 27, 2008, the CAISO submitted a tariff amendment in one of the above-referenced dockets (ER08-1178-000) to revise the Exceptional Dispatch provisions of its MRTU Tariff. The Commission, in an order issued on October 16, 2008, accepted and suspended the proposed tariff revisions for a nominal period, to become effective upon implementation of the MRTU Tariff, subject to refund and to the outcome of an investigation under Section 206 of the Federal Power Act (“FPA”) into the continued justness and reasonableness of the Exceptional Dispatch mechanism as a whole.¹ The Commission also directed its own Staff to convene a technical conference in the near future in order to “facilitate expeditious resolution of this investigation,” and stated that it “intends to conclude this investigation in a reasonable timeframe so as not to adversely impact the currently planned February 1, 2009 implementation date for MRTU.”² The Commission also noted that an opportunity to comment would be provided following the technical conference.³

Pursuant to the October 16 Order, Commission Staff held a technical conference regarding Exceptional Dispatch on November 6, 2008, and the Commission directed that written comments regarding the presentations the CAISO made at the technical conference and/or issues related to Exceptional

¹ *California Independent System Operator Corp.*, 125 FERC ¶ 61,055, at P 1 and Ordering Paragraphs (A), (B), and (D) (“October 16 Order”).

² *Id.* at PP 1, 1 n.6, and 98, and Ordering Paragraph (E). The implementation of MRTU is sometimes referred to as MRTU go-live.

³ *Id.* at P 98.

Dispatch were due by November 24, 2008, with reply comments being due by December 2, 2008.⁴

II. Request for Extension of Time

The Movants respectfully request a one-week extension of time for filing reply comments in these proceedings, which would make the due date December 9, 2008. Good cause exists for the Commission to grant this request. The Commission established the December 2 due date for reply comments with a view to concluding its FPA Section 206 investigation prior to the planned February 1, 2009 implementation date for MRTU.⁵ On November 24, CAISO's Board of Governors issued a resolution directing CAISO Management to prepare for a March 1, 2009 go-live date in order to provide additional time to resolve outstanding concerns regarding MRTU readiness. The resolution also stated that the Board would further evaluate readiness for a March 1, 2009 go-live date at its December and January meetings.

As a result of this change in schedule for MRTU implementation, there is no need for a compressed schedule for submitting reply comments. Also, providing an additional week to prepare and file reply comments will give the parties to these proceedings more time to give careful consideration to their responses to the comments submitted on November 24, 2008, which will likely increase the usefulness of the reply comments to the parties and to the Commission as it makes its determinations on Exceptional Dispatch issues.

⁴ See Supplemental Notice of Technical Conference, Docket Nos. EL08-88-000 and ER08-1178-000 (Oct. 28, 2008); Notice of Submission of Technical Conference Presentations, Docket Nos. EL08-88-000, *et al.* (Nov. 12, 2008).

⁵ See *supra* footnote 2 and accompanying text.

For these reasons, the Movants request that the due date for reply comments in these proceedings be extended to December 9, 2008.

III. Conclusion

For the foregoing reasons, the Commission should grant this motion for an extension of time and permit the parties in these proceedings to file their reply comments no later than December 9, 2008.

Respectfully submitted,

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Counsel for Western Power Trading Forum

Dated: November 25, 2008

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list for the 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 at Washington D.C. this 25th day of November, 2008.

/s/ Bradley R. Miliauskas
Bradley R. Miliauskas