

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

**California Independent System) Docket No. ER03-942-000
Operator Corporation)**

**MOTION OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
FOR EXTENSION OF TIME TO FILE
RESPONSE TO DEFICIENCY LETTER**

Pursuant to Rule 212 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 (2003), the California Independent Operator Corporation ("ISO") submits this motion seeking an expedited grant by the Commission of an extension of time to file its response to the Delegated Letter Order issued on August 7, 2003 in Docket No. ER03-942-000 ("Deficiency Letter"), which directed the ISO, within 30 days, to provide additional explanation regarding several issues concerning the ISO's Tariff Amendment No. 53. The ISO requests a 40-day extension of time. The ISO is authorized to represent that no party that filed either a protest or comments with respect to Tariff Amendment No. 53 objects to this request. In light of the lack of opposition, the ISO requests that the Commission act favorably on the motion as soon as possible, in any event within one week. If the Commission determines that it is necessary to allow time for answers to this filing, the ISO asks that the Commission shorten the period for such responses to three business days and still act within one week. The ISO has emailed a copy of this motion today to counsel for each party that filed protests or comments in this proceeding, in addition to effecting normal service by mail.

The ISO requests this extension because of the absence of critical personnel during the 30-day time period for response. Specifically, the ISO's Controller, whose input is essential in order to prepare complete and accurate responses to the questions raised in the Deficiency Letter, left the country on a long-planned family sojourn on August 9, 2003, one business day after the Deficiency Letter was issued, and is not scheduled to return until September 12, 2003. The ISO cannot realistically begin to prepare its response to the Deficiency Letter until the Controller returns. For this reason, the ISO respectfully requests that this motion be granted on an expedited basis as noted above, and that its response to the Deficiency Letter be due on October 16, 2003.¹

Respectfully submitted,

Charles F. Robinson
General Counsel
Gene Waas
Regulatory Counsel

/s/ Michael Kunselman
J. Phillip Jordan
Michael Kunselman

The California Independent
System Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
Tel: (916) 608-7135

Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, DC 20007
Tel: (202) 424-7500

¹ In response to a request by PG&E, the ISO states that it does not intend for this extension to delay resolution of the California Refund Proceeding (Docket Nos. EL00-95-045, et al.). The ISO would also note that it does not see any way in which the extension could delay that resolution.

Dated: August 14, 2003

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the restricted service list compiled by the Presiding Judge in the above-captioned dockets.

Dated at Washington, DC, on this 14th day of August, 2003.

/s/ Michael Kunselman

Michael Kunselman

(202) 424-7500