

614 requirements to permit the CAISO to use the S&R Tariff as the platform for presenting black-line changes required by 18 C.F.R. § 35.10(c) in the November 30, 2005 filing of the CAISO's Tariff reflecting the CAISO's Market Redesign and Technology Upgrade (MRTU) and without delaying the requested November 21, 2005 effective date. See e.g., *Duke Energy Oakland*, "Notice of Extension of Time," November 19, 2004 in FERC Docket No. ER05-115-000 (applicant consents to deferral of Commission action).

II. ANSWER

The CAISO does not oppose Movants' request for extension of the comment period in this docket. Although the CAISO disagrees that the "revisions represent a fundamental change of the Tariff which could generate substantial financial and operational repercussion to Market Participants," Motion at ¶ 11 (since the S&R Tariff is substantively identical to existing Tariff, which the Commission has found to be just and reasonable), the CAISO agrees that the filing is "voluminous." Accordingly, the CAISO has no objection to the request for a two-week extension if the Commission not delay issuance of its order beyond November 21, 2005, consistent with Section 205(d) of the Federal Power Act. 16 U.S.C. § 824d(d).

Alternatively, the CAISO does not object to the Commission deferring its decision by two-weeks (see e.g., *Duke Energy Oakland*, "Notice of Extension of Time," November 19, 2004 in FERC Docket No. ER05-115-000), provided that the Commission grant a waiver of Order No. 614 requirements to permit the CAISO to use the S&R Tariff as the platform for presenting black-line changes required by 18 C.F.R. § 35.10(c) in the November 30, 2005 filing of the CAISO's MRTU market design. One of the main

purposes the CAISO sought to achieve in filing the S&R Tariff was to simplify and reorganize the existing ISO Tariff to display the MRTU language in as clear and well organized a manner as possible. The CAISO will be making its MRTU Tariff filing on November 30, 2005 and the timing of the S&R was intended to ensure a Commission order prior to the MRTU filing. So long as the objective of being able to use the S&R Tariff as a baseline for the MRTU filing can be accommodated, the CAISO has no objection to the extension as requested by Movants.

III. CONCLUSION

For the reasons discussed above, the CAISO does not oppose the extension of time.

October 11, 2005

Respectfully submitted,

/s/ Sidney Mannheim Davies

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October 11, 2005

VIA ELECTRONIC FILING

The Honorable Magalie R. Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: California Independent System Operator Corporation
Docket No. ER05-1501-000**

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceeding is the Answer to the Motion for Extension of Time of the California Independent System Operator Corporation.

Thank you for your attention to this matter.

Yours truly,

/s/ Sidney Mannheim Davies

Sidney Mannheim Davies
Associate General Counsel

Counsel for the California Independent
System Operator Corporation

Enclosure

CERTIFICATE OF SERVICE

I hereby certify that I have this 11th day of October 2005 caused to be served a copy of the forgoing document upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

/s/ Sidney Mannheim Davies
Sidney Mannheim Davies