

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

<b>Electricity Market Design and</b>	)	<b>Docket No. RM01-12-000</b>
<b>Structure; Notice of Options</b>	)	
<b>Paper and Request for</b>	)	
<b>Comments</b>	)	

**ANSWER OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
CORPORATION IN SUPPORT OF MOTIONS FOR A  
30-DAY EXTENSION OF TIME**

Pursuant to Rule 213 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213, the California Independent System Operator Corporation ("ISO") now submits its answer in support of the "Motion of the Edison Electric Institute, Including the EEI Alliance of Energy Suppliers and EEI Transmission Group, Together With the American Public Power Association and National Rural Electric Cooperative Association for a 30-Day Extension of Time," and the "Joint Request For Extension of Time For Submittal of Comments" filed by the Members of the Transmission Owners Committee of the Energy Association of New York (referred to collectively as the "Motions for Extension"). The Motions for Extension were submitted on April 18, 2002 in the captioned docket.<sup>1</sup>

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<sup>1</sup> On April 17, 2002, the National Association of Regulatory Commissioners filed a "Motion for Extension of Time" in which it requested that the Commission convene a technical conference to discuss the Commission's April 10, 2002 "Options Paper for Resolving Rate and Transition Issues in Standardized Transmission Service and Wholesale Electric Market Design" ("Options Paper") and extend the deadline for filing comments on the Options Paper until 30 days after the date the technical conference is held.

**I. Answer**

The ISO agrees that, as requested in the Motions for Extension, the Commission should grant an extension of time, until to May 31, 2002, for parties to file comments on the Options Paper. The Options Paper may well have far-reaching implications for regulation of the electric power industry. Thus, it is crucial that parties have sufficient time to evaluate the Options Paper and comment on it. Moreover, the May 1 date for submitting comments on the Options Paper is especially problematic for the ISO because May 1 is also the date that the ISO's proposal for a Comprehensive Market Redesign is due to be filed with the Commission.<sup>2</sup> The ISO personnel responsible for evaluating and commenting on the Options Paper are focused on putting together the May 1 filing. For these reasons, the ISO agrees with the conclusions reached in the Motions for Extension that the Commission should grant, an extension of time, until May 31, to file comments on the Options Paper, and that the Commission provide an expedited response to the request for an extension.

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<sup>2</sup> See *San Diego Gas & Electric Company, et al.*, 97 FERC ¶ 61,275 (2001).

## **II. Conclusion**

For the foregoing reasons, the ISO respectfully submits that the relief requested in the Motions for Extension should be granted in their entirety.

Respectfully submitted,

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