



generators from these requirements. The CAISO agreed in part – it supports an exception for station power – but opposed a broader exception because its scope was not appropriately defined.<sup>2</sup>

After the receiving the motions for rehearing, the Commission on December 27, 2005, issued a Notice extending the time for generators to comply with Amendment 72. This initial extension, however, expired by its own terms on February 3, 2006. The instant motion seeks to renew that stay.

If the Commission intends to grant the renewed motion for extension of time, the CAISO maintains that a prompt ruling (by May 15) would benefit many CAISO Scheduling Coordinators by clarifying the requirements before enforcement begins. Starting with Trade Date May 16, the CAISO will impose sanctions on Scheduling Coordinators that fail to timely submit the two reports required by Amendment 72. See CAISO Tariff 37.6 (requiring adherence to “timelines specified in the ISO Tariff for submitting . . . information” and specifying sanctions for violation). A ruling by May 15 could reduce administrative expenses both for Scheduling Coordinators and the CAISO. The CAISO has no reason to believe that a brief stay pending a ruling from the Commission on rehearing would jeopardize the reliability of the CAISO Controlled Grid. (The CAISO’s partial opposition to the requests for rehearing is based on other grounds, as explained above.)

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<sup>2</sup> The CAISO’s position is explained in its Motion for Leave to File Answer One Day Out-of-Time and Answer to Requests for Rehearing and/or Clarification of the California Independent System Operator Corporation, filed January 6, 2006. This pleading is not intended to change that position.

Accordingly, the CAISO respectfully requests that, if at all possible, the Commission rule on this motion (which the CAISO does not oppose) by May 15, 2006.

Respectfully submitted,

*/s/ Daniel J. Shonkwiler*

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Dated: May 10, 2006

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list for the captioned proceeding, in accordance with Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, CA, on this 10<sup>th</sup> day of May, 2006.

/s/ Daniel J. Shonkwiler

Daniel J. Shonkwiler