

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

Nevada Power Company)	
Sierra Pacific Power Company)	
)	
Complainants)	
)	
v.)	Docket No. EL21-74-000
)	
California Independent System Operator Corporation)	
)	
Respondent)	

**UNOPPOSED MOTION OF THE CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION FOR AN EXTENSION OF TIME FOR ALL
ENTITIES TO SUBMIT PLEADINGS IN RESPONSE TO COMPLAINT**

The California Independent System Operator Corporation (CAISO) respectfully submits this motion for an extension of time, until June 4, 2021, for all entities to submit answers, comments, and interventions in response to the complaint (Complaint) filed by Nevada Power Company and Sierra Pacific Power Company (collectively, NV Energy) in this proceeding on May 17, 2021.¹ The current due date for such responsive pleadings is May 28, 2021.

Good cause exists to grant this motion for an extension of time. NV Energy has authorized the CAISO to represent that NV Energy does not oppose this motion. Granting the motion will make the responsive pleadings due even

¹ The CAISO files this motion pursuant to Rules 212 and 2008(a) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212, 385.2008(a). Capitalized terms not otherwise defined herein have the meanings set forth in the Master Definitions Supplement, Appendix A to the CAISO Tariff.

sooner than the 20-day period typically allowed for responses to complaints.² Further, it will provide time the CAISO needs to prepare a thorough answer to the Complaint given the CAISO will also be working simultaneously on the answer to comments and protests of the CAISO tariff amendment on load, export, and wheeling through priorities referenced in the Complaint. Finally, the requested extension will not interfere with the timetable for issuing Commission orders on that tariff amendment and on the Complaint (for which NV Energy has requested an order 61 days from the date of filing).

I. Background

On May 17, 2021, NV Energy filed the Complaint against the CAISO. NV Energy alleged in the Complaint that the CAISO's proposal to modify the penalty price parameters in the business practice manual that the CAISO applies to wheeling through transactions using the CAISO Controlled Grid is unjust, unreasonable, and unduly discriminatory.

The Complaint also references an amendment to the CAISO Tariff that the CAISO submitted on April 26, 2021 in Docket No. ER21-1790-000 to revise load, export, and wheeling through priorities in the CAISO's day-ahead and real-time market optimization processes and to establish related market rules. The CAISO requested a Commission order on this CAISO Tariff Filing by June 27, 2021.³

In the Complaint, NV Energy requested fast track processing under the Commission's Rules of Practice and Procedure, and requested that the

² 18 C.F.R. § 385.206(f).

³ Transmittal letter for CAISO Tariff Filing at 1-2, 77-78.

Commission act upon the Complaint within 61 days of filing, *i.e.*, by July 16, 2021.⁴ NV Energy did not, however, request that the Commission establish an expedited period for submitting answers, comments, and interventions in response to the Complaint.

The Commission's Rules of Practice and Procedure provide that, "[u]nless otherwise ordered by the Commission, answers, interventions, and comments to a complaint must be filed within 20 days after the complaint is filed."⁵ On May 18, 2021, the Commission issued a Notice of Complaint stating that answers, interventions, and comments to the Complaint are due May 28, 2021.

II. Motion for Extension of Time

For good cause shown, the Commission should grant this motion for an extension of time until June 4, 2021 for all entities to file answers, comments, and interventions in response to the Complaint.

The complainant has authorized the CAISO to represent that NV Energy does not oppose to motion for an extension of time. Granting this motion will still make all responsive pleadings due sooner than the 20-day period generally allowed for responses to complaints under the Commission's Rules of Practice and Procedure.

Further, granting this motion will provide the CAISO with time it needs to answer the Complaint properly given that the CAISO will also be working simultaneously on the answer to comments and protests of the CAISO Tariff

⁴ Complaint at 1, 39.

⁵ 18 C.F.R. § 385.206(f).

Filing, as well as other matters. Comments on the CAISO Tariff Filing are due on May 19, 2021. It would be unnecessarily burdensome for the CAISO to have to answer the Complaint on an expedited basis while also preparing the answer in the CAISO Tariff Filing proceeding. It is unreasonable to require the CAISO to answer the complaint in 11 days – nine days fewer than the standard 20-day response time in the Commission’s regulations – especially given the complainant did not request a shortened response time.

III. Conclusion

For the foregoing reasons, the CAISO respectfully requests that the Commission grant an extension of time, until June 4, 2021, for all entities to submit answers, comments, and interventions in response to the Complaint.

Respectfully submitted,

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Counsel for the California Independent System Operator Corporation

May 19, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service list for the above-referenced proceeding, 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 19th day of May, 2021.

/s/ Bradley R. Miliauskas
Bradley R. Miliauskas