

January 4, 2002

The Honorable Linwood A. Watson, Jr.
Acting Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: Dynegy Power Marketing, Inc., *et al.* v. California Independent
System Operator Corporation
Docket No. EL02-42-000**

Dear Secretary Watson:

Enclosed for filing please find the Motion for Extension of Time of the California Independent System Operator Corporation, submitted in the above-captioned docket.

Two additional copies of the enclosed filing are also provided to be time-stamped and returned to our messenger. Please contact the undersigned with any questions. Thank you for your assistance in this matter.

Respectfully submitted,

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Counsel for the California
Independent System Operator
Corporation

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

Dynegy Power Marketing, Inc.,)	
Mirant Americas Energy)	
Marketing, LP,)	
Mirant California, LLC, and)	
Williams Energy Marketing &)	
Trade,)	
)	
Complainants)	
)	
v.)	Docket No. EL02-42-000
)	
California Independent System)	
Operator Corporation,)	
)	
Respondent.)	

MOTION FOR EXTENSION OF TIME

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) (2001), the California Independent System Operator Corporation (“ISO”) hereby submits its Motion for Extension of Time in which to respond to the Complaint filed on December 18, 2001 in the above-captioned proceeding. For the reasons described below, the ISO respectfully submits that good cause exists for permitting the ISO an additional four days, January 11, 2002, in which to file an answer to the Complaint.¹

¹ The Notice of Complaint issued in the above-captioned proceeding on December 19, 2001 stated that an answer to the Complaint was due by January 7, 2002.

An extension until January 11 is warranted for two reasons. First, the timing of the Complaint's filing was such that a number of holidays have intervened prior to the current date for an answer to be submitted. Second, and more importantly, the ISO personnel who are key to providing a complete answer to the Complaint were recently ill and thus unable to provide input concerning the answer.

For these reasons, the ISO submits that good cause exists to warrant an extension of time until January 11, 2002 in order to permit the ISO to file its answer. Moreover, the ISO would have no objection to an extension until January 11 also being granted as to other entities that may submit filings in response to the Complaint.

WHEREFORE, the ISO respectfully requests that the date for filing an answer in the above-captioned proceeding be extended to January 11, 2002.

Respectfully submitted,

Margaret A. Rostker
The California Independent System
Operator Corporation
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Attorneys for the California Independent System Operator Corporation

Dated: January 4, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this 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 4th day of January, 2002.

Bradley R. Miliauskas
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