

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

San Diego Gas & Electric Company,	)	Docket Nos.	EL00-95-001
Complainant,	)		EL00-95-004
	)		EL00-95-005
v.	)		EL00-95-006
	)		EL00-95-007
Sellers of Energy and Ancillary Services	)		EL00-95-008
Into Markets Operated by the California	)		EL00-95-010
Independent System Operator and the	)		EL00-95-011
California Power Exchange,	)		EL00-95-019
Respondents	)		EL00-95-034
	)		EL00-95-039
	)		EL00-95-040
	)		EL00-95-046
	)		EL00-95-047

Investigation of Practices of the California	)	Docket Nos.	EL00-98-001
Independent System Operator and the	)		EL00-98-004
California Power Exchange	)		EL00-98-005
	)		EL00-98-006
	)		EL00-98-008
	)		EL00-98-009
	)		EL00-98-010
	)		EL00-98-011
	)		EL00-98-018
	)		EL00-98-033
	)		EL00-98-037
	)		EL00-98-038
	)		EL00-98-043
	)		EL00-98-044

Public Meeting in San Diego, California	)	Docket No.	EL00-107-002
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Reliant Energy Power Generation, Inc., )  
Dynergy Power Marketing, Inc. )  
and Southern Energy California, L.L.C., )  
Complainants, )  
v. )  
California Independent System Operator )  
Corporation, )  
Respondent )

Docket No. EL00-97-001

California Electricity Oversight Board, )  
Complainant, )

v. )

All Sellers of Energy and Ancillary Services )  
Into the Energy and Ancillary Services )  
Markets Operated by the California )  
Independent System Operator and the )  
California Power Exchange, )  
Respondents )

Docket No. EL00-104-001

California Municipal Utilities Association, )  
Complainant, )

v. )

All Jurisdictional Sellers of Energy and )  
Ancillary Services Into Markets Operated by )  
The California Independent System Operator )  
and the California Power Exchange, )  
Respondents )

Docket No. EL01-1-001

Californians for Renewable Energy, Inc. (CARE),	)	
	)	
Complainant,	)	
	)	
v.	)	
Independent Energy Producers, Inc. and All Sellers of Energy and Ancillary Services Into Markets Operated by the California Independent System Operator and the California Power Exchange; All Scheduling Coordinators Acting on Behalf of the Above Sellers; California Independent System Operator Corporation; and California Power Exchange Corporation,	)	Docket No. EL01-2-001
	)	
Respondents	)	
	)	
Puget Sound Energy, Inc.	)	
	)	
Complainant,	)	
	)	
v.	)	
All Jurisdictional Sellers of Energy and/or Capacity at Wholesale Into Electric Energy and/or Capacity Markets in the Pacific Northwest, Including Parties to the Western Systems Power Pool Agreement,	)	Docket No. EL01-10-001
	)	
Respondents,	)	
	)	
California Independent System Operator Corporation	)	Docket Nos. ER01-607-000 ER01-607-001
	)	
California Independent System Operator Corporation	)	Docket Nos. RT01-85-002 RT01-85-005
	)	
Investigation of Wholesale Rates of Public Utility Sellers of Energy and Ancillary Services in the Western Systems Coordinating Council	)	Docket Nos. EL01-68-000 EL01-68-002 EL01-68-008
	)	
California Power Exchange Corporation	)	Docket no. ER00-3461-001
	)	
California Independent System Operator Corporation	)	Docket No. ER00-3673-001
	)	

California Independent System Operator Corporation	)	Docket No. ER01-1579-001
	)	
Southern California Edison Company and Pacific Gas and Electric Company	)	Docket Nos. EL01-34-000
	)	EL01-34-001
Arizona Public Service Company	)	Docket Nos. ER01-1444-001
Automated Power Exchange inc.	)	Docket Nos. ER01-1445-001
Avista Energy, Inc.	)	Docket Nos. ER01-1446-001
California Power Exchange Corporation	)	Docket Nos. ER01-1447-001
Duke Energy Trading and Marketing, LLC	)	Docket Nos. ER01-1448-002
Dynegy Power Marketing, Inc.	)	Docket Nos. ER01-1449-002
Nevada Power Company	)	Docket Nos. ER01-1450-001
Portland General Electric Company	)	Docket Nos. ER01-1451-002
Public Service Company of Colorado	)	Docket Nos. ER01-1452-001
Reliant Energy Services, Inc.	)	Docket Nos. ER01-1453-001
Sempra Energy Trading Corporation	)	Docket Nos. ER01-1454-002
Mirant California, LLC, Mirant Delta, LLC, and Mirant Potrero, LLC	)	Docket Nos. ER01-1455-002
Williams Energy Services Corporation	)	Docket Nos. ER01-1456-002

### **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 with a compliance filing as required by the “Order Accepting In Part and Rejecting In Part Compliance Filings,” 97 FERC ¶ 61,293 (2001) and “Order on

Clarification and Rehearing,” 97 FERC ¶ 61,275 (2001), issued on December 19, 2001 in the above-captioned proceedings. For the reasons described below, the ISO respectfully submits that good cause exists for permitting the ISO an additional four days, to January 25, 2002, in which to submit such a compliance filing.<sup>1</sup>

An extension until January 25 is warranted, first, because the timing of the issuance of the orders was such that a number of holidays have intervened prior to the current date for a compliance filing to be submitted and key ISO personnel were unavailable for a number of days to assist in the preparation of the compliance filing. Moreover, the ISO is timely filing three motions for clarification and requests for rehearing on the above-cited two orders, as well as on the “Order Temporarily Modifying The West-Wide Price Mitigation Methodology,” 97 FERC ¶ 61, 294 (2001), also issued December 19, 2001, in the above-captioned dockets and the preparation of these three filings necessarily have constrained ISO personnel from finalizing the compliance filing. Finally, the multiple and interrelated proposed revised Tariff sections that the ISO must file demand a most careful review to ensure completeness and consistency amongst the sections and the ISO needs additional time to perform this final review.

For these reasons, the ISO submits that good cause exists to warrant an extension of time until January 25, 2002 in order to permit the ISO to submit its compliance filing.

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<sup>1</sup> The Order Accepting In Part and Rejecting In Part Compliance Filings, 97 FERC ¶ 61,293 (2001) stated that a compliance filing was due with thirty days of the order, *i.e.*, January 18, 2002.

WHEREFORE, the ISO respectfully requests that the date for submitting a compliance filing in the above-captioned proceedings be extended to January 25, 2002.

Respectfully submitted,

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Margaret A. Rostker  
The California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, California 95630  
(916) 608-7147

Counsel for the California Independent  
System Operator Corporation

Dated: January 17, 2002



January 17, 2002

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

Re: San Diego Gas & Electric Company v. Sellers of Energy and Ancillary Services Into  
Markets Operated by the California Independent System Operator and the California  
Power Exchange  
Docket No. EL00-95-000, et al., etc.

Dear Secretary Watson:

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

Thank you for your assistance in this matter.

Respectfully submitted,

Margaret A. Rostker  
Regulatory Counsel  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630

## **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 the above-captioned dockets.

Dated at Folsom, CA on this 17<sup>th</sup> day of January, 2002.

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Margaret A. Rostker  
Counsel for The California Independent  
Operator System Corporation  
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Folsom, CA 95630