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November 22, 2002

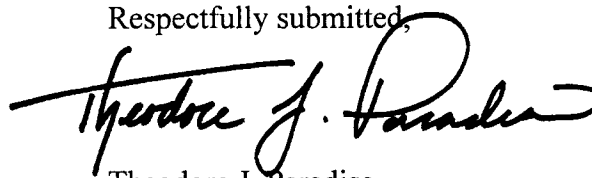
The Honorable Magalie R. Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: *California Independent System Operator Corporation*
Docket Nos. ER02-1656-000, ER02-2576-001

Dear Secretary Salas:

Enclosed with this letter, please find one original and fourteen copies of the Motion of the Indicated Parties¹ to Establish a Date for the Filing of Statements of Position submitted on behalf of the Indicated Parties by the California Independent System Operator Corporation ("ISO"). Also enclosed are two copies of the filing to be stamped and returned to our messenger. Thank you for your assistance with this matter.

Respectfully submitted,



Theodore J. Paradise

Counsel for the California Independent
System Operator Corporation

Enclosures

¹ Indicated Parties include the ISO, the Inter-Agency Working Group (as sponsor of the Resource Adequacy Stakeholder Working Group), Southern California Edison Company (as sponsor of the Integrated Forward Markets Stakeholder Working Group), the Independent Energy Producers Association (as sponsor of the Transitional Issues Stakeholder Working Group), and Mirant, Inc.

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

California Independent System Operator Corporation))))	Docket Nos. ER02-1656-000 ER02-2576-001
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**MOTION OF
THE INDICATED PARTIES
TO ESTABLISH A DATE FOR THE FILING OF STATEMENTS OF POSITION**

Pursuant to Rules 212 and 2008 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure, 18 C.F.R. § 385.212 and § 385.2008 (2002), the Indicated Parties¹ respectfully request that the Commission establish December 2, 2002 as the date for parties to file a Statement of Position on the outstanding issues in the captioned proceeding. In support of this motion, Indicated Parties state as follows:

1. On November 8, 2002, the Commission's Secretary noticed a technical conference to be convened by Commission Staff on December 9, 2002 ("November 8 Notice"). The purpose of the technical conference is to assess the progress of the Stakeholder Working Groups, and to facilitate continued discussions between the ISO and stakeholders regarding the development of the remaining elements of the ISO's Comprehensive Market Redesign Proposal ("MD02") as well as to identify any related implementation issues.

¹ Indicated Parties include the California Independent System Operator Corporation ("ISO"), the Inter-Agency Working Group (as sponsor of the Resource Adequacy Stakeholder Working Group), Southern California Edison Company (as sponsor of the Integrated Forward Markets Stakeholder Working Group), the Independent Energy Producers Association (as sponsor of the Transitional Issues Stakeholder Working Group), and Mirant, Inc.

2. The November 8 Notice also stated that the MD02 Stakeholder Working Groups should file by November 25, 2002, a Stipulation of Issues. The Stipulation of Issues is to identify issues that have been resolved and those issues that remain outstanding.

3. The November 8 Notice also requested that each party prepare its own Statement of Position regarding those issues that remain outstanding. However, the November 8 Notice did not expressly specify the date that the Statements of Position should be filed. Accordingly, there has been significant confusion among the parties regarding the appropriate date for filing the Statements of Position.

4. Because of the complexity of the issues involved and the fact that attempts are still ongoing to resolve issues, the MD02 Stakeholder Working Group Stipulated Issues lists remain in flux and have not yet been finalized. Working Group issue lists should be filed with the Commission on November 25, 2002 in accordance with the November 8 Notice.

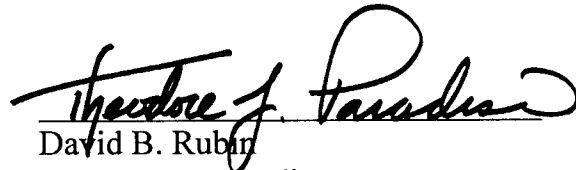
5. Because all of the issues that will comprise the Stipulation of Issues on which the Statement of Positions will be based have not yet been agreed to, parties are currently unable to identify all of the issues that should be addressed in a Statement of Position. Further, numerous parties are not prepared to file a Statement of Position on November 25, 2002 because they did not interpret the November 8 Notice as requiring that position papers be filed on that date.

6. Therefore, Indicated Parties request that the Commission establish that parties have until December 2, 2002 to file a Statement of Position on Stipulated Issues.

This will allow sufficient time for the Stipulation of Issues to be finalized and parties to prepare meaningful Statements of Position based on a final issues list. Indicated Parties respectfully submit that allowing parties to file a Statement of Position on December 2, 2002 will still allow seven days for the Commission's Staff to review the position papers before the December 9, 2002 Technical Conference. Moreover, Staff will ultimately benefit from reviewing meaningful position papers rather than position papers that were hastily prepared in order to meet any November 25, 2002 deadline, and the Commission's decisional record will be improved.

7. WHEREFORE, for the reasons stated above, the Indicated Parties respectfully request that the Commission establish that parties have until December 2, 2002 to file a Statement of Position.

Respectfully submitted,



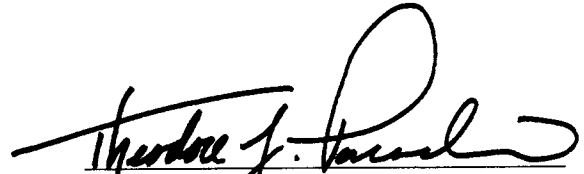
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Dated: November 22, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person listed 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. § 285.2010 (2002).

Dated at Washington in the District of Columbia this 22nd day of November, 2002.



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