

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

Standardization of Generator)	Docket No. RM02-1-000
Interconnection Agreements)	
and Procedures)	

**MOTION OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION,
JURISDICTIONAL PARTICIPATING TRANSMISSION OWNERS AND THE CALIFORNIA
PUBLIC UTILITIES COMMISSION FOR EXTENSION OF TIME TO SUBMIT COMPLIANCE
FILING WITH A REQUEST FOR SHORTENED COMMENT PERIOD ON MOTION AND
EXPEDITED ACTION THEREON**

The California Independent System Operator Corporation (“CAISO”) and its Jurisdictional Participating Transmission Owners (Pacific Gas and Electric Company (“PG&E”), San Diego Gas & Electric Company (“SDG&E”), Southern California Edison Company (“SCE”) (collectively, “PTOs”), as well as the California Public Utilities Commission (“CPUC”) hereby respectfully request¹ an extension of time² to submit their compliance filings in response to the Commission’s Final Rule issued July 24, 2003, in the above-captioned proceeding³ (“Order No. 2003”). The sixty (60)-day period for compliance filings required by Order No. 2003 will end on October 20, 2003. The CAISO, CPUC and PTOs respectfully request that they have an additional ninety (90) days, until January 19, 2004, to submit their compliance filings⁴.

¹ Capitalized terms not otherwise defined herein shall have the meanings set forth in the Master Definitions Supplement, Appendix A to the ISO tariff.

² This motion is filed pursuant to Rules 212 and 2008 of the Commission’s Rules of Practice and Procedure, 18 CFR §§ 385.212 and 385.2008 (2003).

³ *Standardization of Generator Interconnection Agreements and Procedures*, 104 FERC ¶ 61,103 (2003).

⁴ The CAISO and PTOs also request that the effective date of the Final Rule be extended until January 19, 2004.

Order No. 2003 contains extensive and detailed provisions for the standardization of generator interconnection procedures and the associated interconnection agreement. These provisions differ in many respects from the CAISO interconnection and cost allocation procedures already in place pursuant to earlier CAISO and PTO filings and Commission orders. For example, the provisions in Order No. 2003 that relate to the two separate interconnection products, the multi-stage interconnection study process, and the new *pro forma* interconnection agreement all differ substantially from the current CAISO and TO Tariffs and related CAISO and PTO procedures and agreements currently in use.

Order No. 2003 provides ISOs flexibility in the compliance process to customize their interconnection procedures and agreements to meet their regional needs. The CAISO is beginning to work with its Market Participants to review the many provisions in Order No. 2003 to determine which of those it will request be modified to meet the regional needs of the CAISO Market. The CAISO will soon begin a series of stakeholder meetings with its Market Participants on this matter. It is clear to the CAISO, the CPUC, the PTOs, and CAISO Market Participants that it will take a significant effort to work through the many provisions of Order No. 2003 and to prepare compliance filings that best meet the needs of the CAISO Market. The CAISO's and PTOs' compliance filings will include amendments not only to the CAISO Tariff, but also amendments to the TO Tariffs, and/or wholesale distribution access tariffs (if a PTO has Large Generators interconnecting to its Distribution System). The need to simultaneously change all of these documents will require adequate time to ensure that the proposed changes are consistent, understood and appropriate for all entities.

The CAISO, the CPUC and PTOs also respectfully request a shortened comment period of four (4) calendar days to respond to this Motion, to and including September 26,

2003, and expedited resolution of this Motion so that the CAISO can schedule the significant amount of work needed to complete this compliance filing in addition to the substantial stakeholder process that is necessary to gain understanding and acceptance of the needed changes in an orderly and productive manner.

All communications regarding this proceeding should be addressed to:

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<p>Arocles Aguilar Laurence Chaset Public Utilities Commission Of the State of California Legal Division 505 Van Ness Avenue San Francisco, CA 94102 Telephone: 415-355-5595 Facsimile: 415-703-4592 Email: aro@cpuc.ca.gov</p>	

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Attorneys for
PUBLIC UTILITIES COMMISSION
OF THE STATE CALIFORNIA

WHEREFORE, for the above-stated reasons, the CAISO, the CPUC and PTOs respectfully request that the Commission grant an extension of time, until January 19, 2004, for the CAISO and PTOs to submit their compliance filings in the above-captioned proceeding; that the comment period for this Motion be shortened to four (4) calendar days, until September 26, 2003; and that this Motion be resolved expeditiously.

Respectfully submitted on behalf of the
California Independent System Operator
Corporation, the California Public Utilities
Commission and PTOs

By _____
Regulatory Counsel

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Attorneys for the
CALIFORNIA INDEPENDENT SYSTEM
OPERATORS CORPORATION

Dated: September 22, 2003



September 22, 2003

Ms. Magalie Roman Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, D.C. 20426

Re: *Standardization of Generator Interconnection Agreements and Procedures* FERC
Docket No. RM02-1-000

Dear Ms. Salas:

Attached please find for Electronic Filing a joint Request for Extension of Time for Compliance Filing, with a Request for a Shortened Comment Period on extension and Expedited Action thereon of the California Independent System Operator Corporation, Jurisdictional Participating Transmission Owners and The California Public Utilities Commission in the above referenced matter.

Should you have any questions or comments regarding this filing, please do not hesitate to call me at (916) 608-7049. Thank you for your assistance.

Regards,

Gene Waas
Regulatory Counsel
California Independent System
Operators Corporation
151 Blue Ravine Rd.
Folsom, California 95630

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each party designated on the official service list compiled by the Secretary in Docket No. RM02-1-000 in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. 385.2010 (2003).

Dated at Folsom, California, on this 22nd day of September 2003.

Gene L. Waas