

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

Re: San Diego Gas & Electric Company v. Sellers of Energy and Ancillary Service Into Markets Operated by the California Independent System Operator and the California Power Exchange, Docket No. EL00-95-058

Investigation of Practices of the California Independent System Operator and the California Power Exchange, Docket No. EL00-98-050

Public Meeting in San Diego, California, Docket No. EL00-107-009

Reliant Energy Power Generation, Inc., Dynegy Power Marketing, Inc., and Southern Energy California, L.L.C. v. California Independent System Operator Corporation, Docket No. EL00-97-003

California Electricity Oversight Board 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, Docket No. EL00-104-008

California Municipal Utilities Association v. All Jurisdictional Sellers of Energy and Ancillary Services Into Markets Operated by the California Independent System Operator and the California Power Exchange, Docket No. EL01-1-009

CALifornians for Renewable Energy, Inc. (CARE) 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. EL01-2-003

Investigation of Wholesale Rates of Public Utility Sellers of Energy and Ancillary Services in the Western Systems Coordinating Council, Docket No. EL01-68-011

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," 99 FERC ¶ 61,158 (2002), issued on May 15, 2002 in the above-captioned proceedings. For the reasons described below, the ISO respectfully submits that good cause exists for permitting the ISO an additional six business days, to June 24, 2002, in which to submit such a compliance filing.¹

An extension until June 24 is warranted, first, because the timing of the issuance of the orders was such that Friday, June 14, 2002, the due date for the compliance filing, is the same day that the ISO is required to file its Fourth Quarterly Report as required by the Commission in a previous order in the above-captioned proceedings. Moreover, on the following Monday, June 17, the ISO must make a large, significant filing (over 500 pages) as a part of its Market Design 2002 ("MD02"). Finally, the ISO also must file in this same time period an answer to protests to the initial MD02 filing made on May 1, 2002. Given the short schedule the Commission had urged on the ISO for the MD02 effort, ISO staff are completely consumed in the MD02 effort.

¹ The Order Accepting In Part and Rejecting In Part Compliance Filings, 99 FERC ¶ 61,158 (2002) stated that a compliance filing was due with thirty days of the order, *i.e.*, June 14, 2002.

Inasmuch as it is the same key ISO staff necessarily involved in the preparation of the MD02 filings and the compliance filing, the ISO simply cannot complete the drafting and review of the compliance filing by Friday, June 14.

For these reasons, the ISO submits that good cause exists to warrant an extension of time until June 24, 2002 in order to permit the ISO to submit its compliance filing.

WHEREFORE, the ISO respectfully requests that the date for submitting a compliance filing in the above-captioned proceedings be extended to June 24, 2002.

Respectfully submitted,

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

Counsel for the California Independent System
Operator Corporation

Dated: June 13, 2002