

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

California Independent System Operator) Corporation)	Docket Nos. ER01-889-003 ER01-889-005 ER01-889-006 ER01-889-009 ER01-889-010
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California Independent System Operator) Corporation)	Docket Nos. ER01-3013-001 ER01-3013-002
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San Diego Gas & Electric Company,) Complainant) v.) Sellers of Energy and Ancillary Services) Into Markets Operated by the) California Independent System) Operator and the California Power) Exchange,) Respondents)	Docket No. EL00-95-036
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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 Clarifying The Creditworthiness Requirement, Denying Rehearing And Rejecting In Part Compliance Filings," ("Order"), 98 FERC ¶ 61,335 (2002), issued on March 27, 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 four days, to April 17, 2002, in which to submit such a compliance filing.¹

An extension until April 17 is warranted, first, because the issuance of the order was simultaneous with a second Commission order, on Amendment No. 42, which also obliges the ISO to submit a compliance filing within the same fifteen-day period. Moreover, the Commission further directed the ISO to participate in a two-day Commission-sponsored technical conference on ISO market design in this same time period. Preparation of the compliance filing for the order on Amendment No. 42 and participation in the Commission's technical conference necessarily consumed significant amounts of time of the same key ISO personnel who must prepare the compliance filing. As a result, these ISO personnel were unavailable to assist in the preparation of the instant required compliance filing.

Lastly, the ISO is manually preparing settlement data tables to clearly illuminate the ISO settlement process of offsetting amounts owed by and owed to the California Department of Water Resources ("CDWR") such that the Commission will receive a clear and simple "road map" of the ISO's invoicing and settlement of the CDWR for transactions in ISO markets on behalf of the non-creditworthy investor-owned utilities in California. The preparation of these supplemental materials, which are not normally prepared by the ISO, requires cross-linking of several large data bases to create new tables and the ISO needs additional time to prepare and review these documents for accuracy.

¹ The Order stated that a compliance filing was due with fifteen days of the order, *i.e.*, April 11, 2002.

For these reasons, the ISO submits that good cause exists to warrant an extension of time until April 17, 2002 for the ISO submission of its compliance filing.

WHEREFORE, the ISO respectfully requests that the date for submitting a compliance filing in the above-captioned proceedings be extended to April 17, 2002.

Respectfully submitted,

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

Dated: April 10, 2002



April 10, 2002

The Honorable Magalie Roman Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

**Re: California Independent System Operator Corporation
Docket Nos. ER01-889-003, ER01-889-005, ER01-889-006, ER01-889-009,
ER01-889-010**

**California Independent System Operator Corporation
Docket Nos. ER01-3013-001, ER01-3013-002**

**San Diego Gas & Electric Company v. Sellers of Energy and Ancillary Services
Into Market Operated by the California Independent System Operator and the
California Power Exchange
Docket No. EL00-95-036**

Dear Secretary Salas:

Enclosed for electronic filing please find the Motion for Extension of Time in the above-captioned dockets.

Thank you for your assistance in this matter.

Respectfully submitted,

Margaret A. Rostker
Counsel for The California Independent
System Operator Corporation
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(916) 608-7147

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 10th day of April, 2002.

Margaret A. Rostker