

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

Revised Public Utility Filing Requirements ) Docket No. RM01-8-000  
Electric Quarterly Reports ) Docket No. ER02-2001-000

**MOTION OF THE CALIFORNIA INDEPENDENT  
SYSTEM OPERATOR CORPORATION FOR LIMITED EXTENSION OF TIME TO  
FILE FIRST QUARTER 2003 ELECTRIC QUARTERLY REPORT**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.212, the California Independent System Operator Corporation (“ISO”) requests leave to submit its First Quarter 2003 Electric Quarterly Report (“EQR”) when the EQR software problem is resolved sufficiently to allow the ISO to complete this report. In support of this motion, the ISO states as follows.

**I. Background**

On April 25, 2002, Commission issued Order 2001,<sup>1</sup> amending its filing requirements under the Federal Power Act to require public utilities to file electronically Electric Quarterly Reports summarizing the contractual terms and conditions in their agreements for all jurisdictional services (including market-based power sales, cost-based power sales, and transmission service) and transaction information for short-term

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<sup>1</sup> *Revised Public Utility Filing Requirements*, Order No. 2001, 67 FR 31043, FERC Stats. & Regs. ¶ 31,127 (April 25, 2002) (“Order 2001”); *reh’g denied*, Order No. 2001-A, 100 FERC ¶ 61,074, *reconsideration and clarification denied*, Order No. 2001-B, 100 FERC ¶ 61,342 (2002). See also *Revised Public Utility Filing Requirements*, Order No. 2001-C, 101 FERC ¶ 61,314 (2002), and Order No. 2001-D, 102 FERC ¶ 61,334 (2003).

and long-term market-based power sales and cost-based power sales during the most recent calendar quarter.

On February 20, 2003, the ISO submitted what it believed was its Fourth Quarter 2002 EQR in accordance with the Commission's 2001 Orders.

On March 24, 2003, the Commission issued a "Notice of Electric Quarterly Reports Workshop." The Workshop was intended to allow Commission staff to explain and demonstrate improvements to the EQR software and "lessons learned" from the Fourth Quarter 2002 EQR experience. In addition, as described in an April 4, 2003 "Notice Providing Further Details on Electric Quarterly Reports Workshop," the Commission stated that it was "interested in soliciting questions and/or comments regarding the EQR Submission and Dissemination Systems in advance of, as well as during, the Workshop." April 4, 2003 Notice at 1.

Due to concerns raised by a number of public utilities regarding the ability to complete the corrected Fourth Quarter 2002 EQR required by the Commission, on March 28, 2003, the Commission issued Order 2001-D, which required that public utilities file corrected Fourth Quarter EQRs by April 11, 2003. The specific corrections outlined in Order 2001-D included, but are not limited to, Total Transaction Charge field comma errors, file conversion errors, and lack of DUNS numbers. The ISO and several other entities requested extensions in the date for filing the corrected Fourth Quarter 2002 EQRs, in light of the fact that the Workshop was scheduled for that same day. The ISO, in its April 8 Motion for Extension of Time, requested that it be permitted to file on April 25 to "allow the CAISO to digest and apply the direction provided by the Workshop." In response to the several requests, without specifically identifying the

various entities that filed motions, the Commission on April 9, 2003 issued a “Notice of Extension of Time” extending the date by which all public utilities must file the corrected EQR to April 18, 2003.

On April 17, 2003, the ISO filed a motion that requested, *inter alia*, a one-week extension from the April 18 due date to submit its revised Fourth Quarter 2002 EQR. The Commission issued a Notice of Extension of Time granting this request on April 25, 2003. That same day, the Commission also granted a blanket extension in the due date for the First Quarter 2003 EQR to May 15, 2003 via a second Notice of Extension of Time.

Also on April 25, the ISO requested a further, limited extension of time to make its Fourth Quarter 2002 EQR filing, in light of a problem with the Commission’s EQR software. The Commission has not yet acted on this request.

## **II. Argument**

The ISO seeks a limited extension in time to submit its First Quarter 2003 EQR due to the malfunctions/glitches that have affected the Commission’s EQR software. The ISO had been working diligently to complete both its revised Fourth Quarter EQR and its First Quarter 2003 EQR, and had anticipated no difficulty in submitting the latter today, the date upon which it is due. Unfortunately, this has not been possible do to the problems occurring with the EQR software.

Because the ISO needs to enter manually several items in its EQR, it will not be able to complete the report (or the Fourth Quarter 2002 corrected EQR) until this problem is resolved fully.

### III. Conclusion

For these reasons, the ISO requests that the Commission grant its request for a limited extension of time submit its First Quarter 2003 EQR.

Respectfully submitted,

Charles F. Robinson  
General Counsel  
John Anders  
Regulatory Counsel  
The California Independent  
System Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 608-7135

\_\_\_\_\_/s/ **Julia Moore**\_\_\_\_\_  
Kenneth G. Jaffe  
David B. Rubin  
Julia Moore  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, N.W., Suite 300  
Washington, DC 20007  
Tel: (202) 424-7500

Attorneys for the California Independent  
System Operator Corporation

Dated: May 15, 2003

## **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 docket.

Dated at Washington, DC, on this 15<sup>th</sup> day of May, 2003.

    /s/ **Julia Moore**      
Julia Moore