

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

**California Independent System  
Operator Corporation**

**Docket No. ER13-2063-\_\_\_\_\_**

**MOTION FOR EXTENSION OF TIME OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (“ISO”) hereby requests that the Federal Energy Regulatory Commission (the “Commission”) extend the deadline for the ISO to respond to the Commission’s October 22, 2013, Deficiency Letter issued in the above-captioned docket. The ISO seeks to extend the response date from November 21, 2013 to January 15, 2014.<sup>1</sup> The ISO appreciates the need to consider the Commission’s questions carefully and is in the process of collecting necessary information to respond. However, most of the key ISO staff working on providing material and information that is responsive to the October 22<sup>nd</sup> letter are also dedicated to finalizing the ISO’s upcoming filing to implement modifications to the ISO real-time market to accept and price fifteen minute schedules which will also serve to comply with Commission Order No. 764.<sup>2</sup> This extension will permit the ISO to devote the needed resources to its response

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<sup>1</sup> The ISO submits this request pursuant to Rules 212 and 2008 of the Commission’s Rule of Practice and Procedure. See 18 C.F.R. §§ 385.212, 385.2008 (2013).

<sup>2</sup> *Integration of Variable Energy Resources*, Order No. 764, FERC Stats. & Regs. ¶ 31,331 (“Order No. 764”), *order on reh’g and clarification*, Order No. 764-A, 141 ¶ 61,232 (“Order No. 764-A”) (2012), *order on clarification and reh’g*, Order No. 764-B, 144 FERC ¶ 61,222 (2013).

while not compromising unnecessarily the ISO's filing to implement the new market changes and compliance with the Commission's Order No. 764.

## **I. BACKGROUND**

On July 30, 2013, the ISO filed tariff amendments in the above-captioned proceeding pursuant to Section 205 of the Federal Power Act. The tariff amendments sought to: (1) require certain resources that are operable in multiple configurations to register as multi-stage generation resources; and (2) modify the minimum load cost tolerance band test to eliminate the possibility for a resource to receive minimum load cost recovery payments when the resource is not actually producing at minimum load. The ISO requested that the proposed tariff revisions become effective November 1, 2013. Due to interdependencies with other market initiatives, on October 17, 2013, the ISO requested that the tariff revisions instead become effective April 1, 2014. In response to the ISO proposal, on October 22, 2013, the Commission issued the ISO a Deficiency Letter requesting additional information before the Commission could process the filing. The ISO's response is due 30 days from that letter, *i.e.*, November 21, 2013.

## **II. MOTION FOR EXTENSION OF TIME**

The ISO respectfully requests an extension of time to January 15, 2014, to submit its response to the October 22<sup>nd</sup> letter. Given that the ISO does not seek to implement the tariff revisions proposed in the instant docket until April 1, 2014, the ISO does not believe that granting an extended response timeline would disrupt the Commission's decision making process.

The ISO continues to believe the tariff revisions proposed in its initial July 30<sup>th</sup> filing are just and reasonable and will provide overall benefits to the ISO's markets. It is thus anxious to provide a response to the October 22<sup>nd</sup> letter so that this important initiative is not delayed beyond the intended April 1, 2014, implementation date. Upon receipt of the October 22<sup>nd</sup> letter, the ISO immediately began considering the Commission's questions. Under normal circumstances the Commission requests would not pose a challenge. However, resource limitations given the ISO's need to focus its efforts towards completing the real-time market design changes will make it difficult for the ISO to provide a thorough and appropriate response by the November 21<sup>st</sup> date. In addition, responding to the Commission's questions will require the production of certain data, which the ISO is collecting. However, additional time is required to prepare and present the data and to respond to the specific questions posed by the Commission.

The ISO will submit its Order No. 764 compliance filing and associated tariff amendments no later than November 27, 2013.<sup>3</sup> The magnitude of the market rule changes and associated system alterations required by ISO's Order No. 764 compliance process is significant and has required significant dedication of resources. The ISO staff working on finalizing the Order No. 764 submission largely overlaps with the staff involved in the instant docket. Given these resource constraints, it would be extremely difficult for the ISO to meet its Order 764 filing

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<sup>3</sup> *Integration of Variable Energy Resources*, Notice of Extension of Time, FERC Docket No. RM10-11 (Oct. 18, 2013) (granting the ISO until November 27, 2013 to submit its compliance materials).

date and provide a timely, meaningful and well-considered response to the Commission's October 22, 2013 letter.

An extension to January 15, 2014, will provide the ISO additional time to respond more effectively and will also provide sufficient time for the Commission to issue an order before the April 1, 2014, expected effective date of the proposed tariff changes.

### **III. CONCLUSION**

For the foregoing reasons, the ISO respectfully requests that the Commission grant the requested extension for it to respond to the Commission's October 22, 2013 Deficiency Letter.

Respectfully submitted,

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