

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

**Consolidated Edison Company of New York Inc.**

v.

**Public Service Electric and Gas Company,  
PJM Interconnection, L.L.C., and  
New York Independent System Operator, Inc.**

**Docket Nos. EL02-23-008,  
EL02-23-009,  
EL02-23-010,  
and EL02-23-011**

**UNOPPOSED MOTION  
FOR FURTHER EXTENSION OF TIME TO FILE STATUS REPORT**

Pursuant to Rule 212 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212 (2004), the New York Independent System Operator, Inc. ("NYISO"), PJM Interconnection, L.L.C. ("PJM"), and Public Service Electric and Gas Company ("PSE&G") (together, the "Joint Movants") request an extension of time from October 31, 2006, to January 19, 2007, to file updated status reports on protocol performance in the above-captioned dockets. Consolidated Edison Company of New York, Inc. ("Con Edison") has authorized Joint Movants to state that it does not oppose this motion.

**I. BACKGROUND**

On December 30, 2005, Con Edison, PSE&G, NYISO and PJM submitted status reports in the above-captioned dockets, reporting on the performance under a protocol that was approved by the Commission for implementation beginning on July 1, 2005. See Consol. Edison Co. of New York v. Pub. Serv. Elec. and Gas Co., et al., 111 FERC ¶ 61,228 (2005). On April 21, 2006, the Commission issued a letter order responding to the parties' suggestion and directing the Joint Movants to file additional status reports on protocol

performance in 2006. Subsequently, on May 15, 2006, and September 21, 2006, the Joint Movants requested orders directing that the reporting period cover operations during the peak summer period through September 2006 and extending the time for the submission of the status reports. On September 27, 2006, the Commission issued a Notice of Extension of Time extending the date for filing the currently required status reports to October 31, 2006, with a reporting period covering December 1, 2005 through September 2006.

## **II. JOINT MOTION**

The Joint Movants and Con Edison have subsequently continued to confer about the issues raised in earlier status reports regarding performance under the protocol. In October, the two ISOs agreed to undertake, in cooperation with PSE&G and Con Edison, further reviews of certain issues raised by Con Edison regarding protocol performance. These reviews are to be informed by protocol implementation experience to date, including the period through September 2006, and will take some time to complete. The Joint Movants believe that continued discussions among them regarding these issues rather than submitting their further status reports at this time would be helpful, would inform the further status reports, and could potentially narrow or eliminate issues that may be raised in the status reports. The Joint Movants and Con Edison have agreed to address the issues expeditiously, to exchange certain information pertaining to the issues, to circulate recommendations regarding protocol implementation, and to meet in mid-November to continue their discussions. Accordingly, the Joint Movants respectfully request that the filing date for the currently required status reports be extended from October 31, 2006 until January 19, 2007.

WHEREFORE, for the foregoing reasons the Joint Movants respectfully request that the Commission grant their motion to extend the time for filing status reports to and including January 19, 2007.

Respectfully submitted,

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October 26, 2006

Pjm/100mw/unopp motion-final

**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 this proceeding in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2005).

Dated at Washington, D.C. this 26th day of October, 2006.

By: /s/ Barry S. Spector  
Barry S. Spector, Esq.