

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

|  |   |  |
|--|---|--|
| <b>New York Independent System Operator, Inc.</b>        | ) | <b>Docket No. ER01-3155-000</b>                      |
|  | ) |  |
| <b>Consolidated Edison Company of New York,<br/>Inc.</b> | ) | <b>Docket Nos. ER01-1385-001 and<br/>EL01-45-001</b> |
|  | ) |  |

**NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.’S  
EMERGENCY MOTION REQUESTING AN ADDITIONAL EXTENSION OF TIME TO  
MAKE ITS COMPREHENSIVE MARKET POWER MITIGATION  
COMPLIANCE FILING**

Pursuant to Rule 212 of the Commission’s Rules of Practice and Procedure,<sup>1</sup> the New York Independent System Operator, Inc. (“NYISO”) respectfully submits this motion requesting an additional extension of time to complete its comprehensive market power mitigation compliance filing.<sup>2</sup> This extension is necessary because a major personal emergency has made it impossible for the lawyer leading the NYISO’s compliance filing effort to continue working on it.<sup>3</sup> Consequently, the NYISO and its outside counsel need additional time to re-organize the compliance filing project team, determine what needs to be done to finalize the compliance filing and then complete the work. The NYISO is requesting a ten day extension of time for this purpose. However, the NYISO understands the importance of giving the Commission adequate time to review the complex issues involved in this proceeding and will do everything possible to make the compliance filing well before the ten day period expires.

---

<sup>1</sup> 18 C.F.R. § 385.212 (2001).

<sup>2</sup> Pursuant to the Commission’s March 5 *Notice of Extension of Time* in the above-captioned proceedings the compliance filing is currently due on March 11.

All communications regarding this proceeding should be addressed to:

Robert E. Fernandez, General Counsel and Secretary  
Belinda F. Thornton, Director of Regulatory Affairs  
New York Independent System Operator, Inc.  
3890 Carman Road  
Schenectady, NY 12303  
Tel: (518) 356-7661  
Fax: (518) 356-4702  
rfernandez@nyiso.com  
bthornton@nyiso.com

Arnold H. Quint  
Ted J. Murphy  
Hunton & Williams  
1900 K Street, NW  
Washington, DC 20006  
Tel: (202) 955-1500  
Fax: (202) 778-2201  
aquent@hunton.com  
tmurphy@hunton.com

Respectfully submitted,

NEW YORK INDEPENDENT  
SYSTEM OPERATOR, INC.

By \_\_\_\_\_  
Counsel

Arnold H. Quint  
Ted J. Murphy  
Hunton & Williams  
1900 K Street, N.W.  
Washington, D.C. 20006  
Of Counsel

March 8, 2002

---

<sup>3</sup> The emergency that necessitates this filing occurred on the afternoon of March 7. If it had not happened, the NYISO expects that it would have made the compliance filing, as planned, on March 11.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each party designated on the official service list compiled by the Secretary in Docket Nos. ER01-3155-000, ER01-1385-001 and EL01-45-001, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18. C.F.R. 385.2010 (2001).

Dated at Washington, D.C. this 8th day of March, 2002.

\_\_\_\_\_  
Ted J. Murphy  
Hunton & Williams  
1900 K Street, N.W.  
Washington, D.C. 20006-1109  
(202) 955-1588