

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

KeySpan-Ravenswood, Inc. Corporation)	
)	
v.)	Docket No. EL01-50-000
)	
New York Independent System Operator, Inc.)	

**MOTION OF
THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.
FOR EXTENSION OF TIME TO MAKE COMPLIANCE FILING**

The New York Independent System Operator, Inc. ("NYISO") hereby submits this motion for an extension of time¹ for the NYISO to submit its compliance filing in response to the Commission's Order issued May 15, 2002 in *KeySpan-Ravenswood, Inc. v. New York Independent System Operator, Inc.*² ("May 15 Order"). This proceeding addresses certain issues related to station power. The NYISO requests that it have until September 20, 2002 within which to make the compliance filing. Waiver of the Commission's regulations is requested to the extent necessary to permit this filing and the further filing as requested herein.

In the May 15 Order, the Commission directed the NYISO to make a compliance filing to revise its Market Administration and Control Area Services Tariff ("Services Tariff") to:

- (1) amend the provisions of its Services Tariff to address the treatment of station power used by merchant generators to the extent such station power is jurisdictional; and (2) "allow self-supplying merchant generators to net station power against gross output over some reasonable

¹ This motion is filed pursuant to Rule 212 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212 (2002).

² 99 FERC ¶ 61,167 (2002).

period in order 'to ensure that they do not bear a cost that has no relationship to any 'service' purportedly being provided by another party.'"³ (footnote omitted)

The Commission acknowledged in the May 15 Order the need for the NYISO to work with its stakeholders to ensure that the tariff changes to be filed are workable in New York. The NYISO has had numerous discussions with its stakeholders to develop a proposal acceptable to a broad cross-section of those stakeholders. This is a hotly contested issue on which consensus may not be possible, but the NYISO requests additional time for further stakeholder input.

CONCLUSION

WHEREFORE, for the above-stated reasons, the NYISO respectfully urges the Commission to grant the request to postpone the due date for the NYISO's submission of the compliance filing in accordance with the May 15 Order until September 20, 2002.

Respectfully submitted,

NEW YORK INDEPENDENT
SYSTEM OPERATOR, INC.

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August 29, 2002

³ *Id.* at 61,680.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing have been served upon each person on the official service list and the restricted service list in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Dated at Washington, D.C. this 29th day of August, 2002.

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