

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

KeySpan-Ravenswood, LLC,)	
)	
Complainant,)	
)	
v.)	Docket No. EL05- 17-000
)	
)	
New York Independent System Operator, Inc.,)	
)	
Respondent.)	

**MOTION OF
NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.
FOR EXTENSION OF TIME TO FILE ANSWER**

Pursuant to Rules 212 and 2008 of the Commission’s Rules of Practice and Procedure,¹ the New York Independent System Operator, Inc. (“NYISO”) hereby respectfully requests an extension of time to submit its answer to the complaint (“Complaint”) filed on October 27, 2004, by KeySpan Ravenswood, LLC (“Keyspan”) in the above-captioned proceeding. The Commission’s Notice of the filing of the Complaint specified that an answer be filed on or before November 17. For the reasons set forth below, the NYISO requests that this deadline be extended to November 29, 2004.

Counsel for Keyspan has authorized counsel for the NYISO to state that Keyspan does not object to extending the deadline for filing an answer to the Complaint to November 29, 2004.

¹ 18 C.F.R. §§ 385.212 and 385.2008.

I. Communications

Communications concerning this Docket should be directed to the following persons, and their names should be placed on the official services list:

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II. Motion for Extension of Time

The Complaint alleges that in the Summer 2002 Capability Period, the methodology developed in the NYISO stakeholder process for translating Installed Capacity (“ICAP”) to Unforced Capacity (“UCAP”) violated the New York State Reliability Council Agreement, the Agreement between the NYISO and the NYSRC, and the NYISO’s Market Administration and Control Areas Services Tariff. The Complaint alleges that Keyspan is entitled to receive \$23.3 million in order to place Keyspan in the position it would have occupied if the ICAP to UCAP translation methodology had complied with the foregoing tariff and agreements. In addition, Keyspan requests that the Commission apply the methodology proffered in its Complaint to provide relief to other capacity suppliers for the Summer 2002 Capability Period. The NYISO preliminarily estimates that the total impact on load serving entities of the relief requested in the Complaint would be approximately \$35-40 million.

Keyspan has accompanied its complaint with an extensive set of exhibits, comprising some 250 pages. The technical and tariff-related issues raised by the Complaint are significant and potentially complex. In addition, the knowledgeable NYISO personnel are also currently engaged in pending NYISO proceedings on installed capacity requirements, and in particular proceedings relating to the NYISO ICAP Demand Curve.

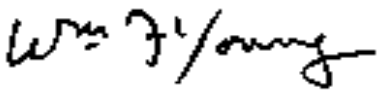
The precedent that would be set by the relief requested by Keyspan could have far-reaching consequences for the development and improvement of competitive power markets in New York. At the same time, it does not appear that Keyspan will be harmed by the requested extension, since the Complaint relates to events that occurred during the Summer 2002 Capability Period, and since Keyspan did not request fast-track processing. Moreover, the Complaint seeks only monetary compensation, and not any form of time-sensitive equitable relief, and no other parties would be prejudiced by the requested extension of time.

The NYISO has been working diligently to review and analyze the voluminous materials presented by Keyspan in order to prepare the NYISO's answer ("Answer") to the Complaint, and much has been done. Even so, the NYISO has concluded that a limited amount of additional time is required to ensure that the Answer fully and effectively contributes to a record that will enable the Commission resolve the significant and potentially complex issues raised in this proceeding.

III. Conclusion

WHEREFORE, for the foregoing reasons, the New York Independent System Operator, Inc. respectfully requests that the Commission grant its request for an extension of time to Monday, November 29, to submit its Answer in the above-captioned proceeding.

Respectfully submitted,

By: 

Counsel

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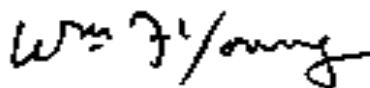
William F. Young
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Dated: November 5, 2004

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served upon each person on the official service list for this Docket, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 CFR § 2010.

Dated at Washington, D.C. this 5th day of November, 2004.



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