

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

New York Independent System Operator, Inc. ) Docket Nos. ER05-941-000

MOTION OF THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC. FOR EXTENSION OF FIFTEEN DAYS TO SUBMIT A COMPLIANCE FILING ON USING THE 97<sup>TH</sup> PERCENTILE IN THE VIRTUAL TRANSACTIONS MARKET

Pursuant to Rule 212 and 2008 of the Commission's Rules of Practice and Procedure,<sup>1</sup> the New York Independent System Operator, Inc. ("NYISO"), hereby respectfully requests an extension of fifteen days, until August 16, 2005, to submit a compliance filing as required by the Commission in its July 1, 2005 Order<sup>2</sup> ("July 1 Order") related to the use of the 97<sup>th</sup> percentile to calculate collateral requirements for the Virtual Transactions market.

## I. Copies of Correspondence

Communications regarding this proceeding should be addressed to:

<sup>&</sup>lt;sup>1</sup> 18 C.F.R. §§ 385.212 and 385.2008 (2004).

<sup>&</sup>lt;sup>2</sup> 112 FERC ¶61,004

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## II. Motion for Extension of Time to Submit a Compliance Filing Regarding The Use Of The 97<sup>th</sup> Percentile In Calculating Collateral Requirements

The NYISO hereby respectfully requests an extension of 15 days, until August 16, 2005, to submit its compliance filing regarding the use of the 97<sup>th</sup> percentile to calculate collateral requirements in the Virtual Transactions market. This extension is necessary to allow the NYISO adequate time to analyze the data necessary to fully and completely respond to the Commission's inquiry.

The NYISO has begun analyzing the data, but will require more time than initially granted by the Commission to complete its analysis and prepare an adequate report. Due to the importance of customer credit issues, the NYISO believes that it is essential to provide as much information as possible to the Commission. Therefore, the NYISO respectfully requests that the Commission grant its request for an extension of 15 days, until August 16, 2005, to submit its compliance filing.

Respectfully submitted,

NEW YORK INDEPENDENT

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SYSTEM OPERATOR, INC.

By /s/ Andrew S. Antinori
Andrew S. Antinori
NIYSO – Senior Attorney

Dated: July 27, 2005

## 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. ER05-941-000, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2004).

Dated at Albany, N.Y. this 27<sup>th</sup> day of July, 2005.

/s/ Andrew S. Antinori

Andrew S. Antinori New York Independent System Operator, Inc. 290 Washington Avenue Extension Albany, New York, 12203 (518) 356-7665

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