

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

Standardization of Small Generator Interconnection) Docket No. RM02-12-000
Agreements and Procedures)

**MOTION FOR EXPEDITED ACTION AND EXTENSION OF TIME
OF THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.**

Pursuant to Rules 212 and 2008 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.2008, the New York Independent System Operator, Inc. (“NYISO”), respectfully requests a brief extension of time, until December 8, 2005, to submit a compliance filing in the above captioned proceeding.¹ An extension will give the NYISO the time it needs to complete discussions with the New York Transmission Owners (“NYTOs”) and other New York stakeholders concerning independent entity variations from the standards of Order No. 2006 that the NYISO intends to seek. Because the compliance filing is currently due on November 10, 2005, the NYISO also asks that the Commission give expedited consideration to its request.

¹ *Standardization of Small Generator Interconnection Agreements and Procedures*, FERC Stats. & Regs., Regs. Preambles ¶ 31,180 (2005) (“Order No. 2006”).

I. COMMUNICATIONS

The NYISO respectfully requests that communications regarding this proceeding should be addressed to:²

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II. STATEMENT OF ISSUES

In compliance with Order No. 663,³ the NYISO respectfully states that the only issue raised in this motion is the need for a brief extension of time to finalize the development of a compliance filing that will enjoy the greatest possible stakeholder support.

III. MOTION FOR EXTENSION OF TIME

By this filing, the NYISO respectfully requests an extension of time, to and including December 8, 2005, to submit its Order No. 2006 compliance filing. The NYISO anticipates that this filing will be made jointly with the NYTOs. The compliance filing will include requests for

² The NYISO respectfully requests a waiver of 18 C.F.R. § 385.203 to permit the inclusion of its outside counsel in both Richmond and Washington, D.C. in the service list in this proceeding.

³ *Revision of Rules of Practice and Procedure Regarding Issue Identification*, 112 FERC P 61,297 (2005).

a number of independent entity variations from the Order No. 2006 model that will reflect New York-specific needs.

The NYISO has previously advised the Commission that it would make a compliance filing by November 10,⁴ and the NYTOs separately obtained permission to make a compliance filing on the same date.⁵ The NYISO and NYTOs have worked diligently to meet the deadline and have made a great deal of progress towards completing a proposal. Nevertheless, a number of complex issues related to the development of independent entity variations have not yet been resolved. Although the NYISO, NYTOs, and other market participants are making every effort to finish their work quickly, it will not be possible to give each issue the thorough consideration it deserves in the time remaining. The NYISO believes that taking a little bit of additional time to complete these discussions will result a better proposal that is more likely to enjoy broad stakeholder support.

No party would be prejudiced if the Commission grants the NYISO's request. Consistent with Order No. 2006,⁶ the NYISO's existing interconnection procedures are still in effect and will remain in place until the Commission acts on the NYISO's compliance filing. Granting the requested extension will, at most, increase the time that these pre-Order No. 2006 procedures will continue in effect for thirty days. It is also possible that granting the extension will facilitate faster Commission action because the extra time will be used to improve the compliance filing and reduce the number of contested issues.

⁴ *Informational Notice Regarding the New York Independent System Operator, Inc.'s Order No. 2006 Compliance Filing*, Docket No. RM02-12-000 (August 11, 2005).

⁵ *See Notice of Extension of Time*, Docket No. RM02-12-000 (August 5, 2005).

⁶ *See Order No. 2006 at P 545.*

Finally, the Commission recently granted the California Independent System Operator Corporation (“CAISO”) until February 10, 2006 to make its Order No. 2006 compliance filing.⁷ Just as it was appropriate to give the CAISO an additional ninety days to address issues with its stakeholders, it is appropriate to give the NYISO a shorter extension to complete its own stakeholder process.

IV. CONCLUSION

WHEREFORE, in view of the foregoing, the NYISO respectfully requests that the Commission grant the extension of time requested herein.

Respectfully submitted,

NEW YORK INDEPENDENT
SYSTEM OPERATOR, INC.

/s/ Ted J. Murphy
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November 9, 2005

⁷ *Notice of Extension of Time*, Docket No. RM02-12-000 (November 4, 2005).