

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

Central Hudson Gas & Electric Corporation)	Docket Nos. ER97-1523-003,
)	ER97-1523-004,
Consolidated Edison Company of New York, Inc.)	OA97-470-004,
)	OA97-470-005,
Long Island Lighting Company)	ER97-4234-002, and
New York State Electric and Gas Corporation)	ER97-4234-003
)	
Niagara Mohawk Power Corporation)	
Orange and Rockland Utilities, Inc.)	Docket Nos. ER97-1523-005,
Rochester Gas and Electric Corporation)	ER97-1523-006,
)	OA97-470-006,
New York Power Pool)	ER97-4234-004, and
)	EC99-31-001
)	
New York Independent System Operator, Inc.)	Docket No. ER97-1523-052
)	
)	Docket No. ER97-1523-061

**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 July 23, 2002 in the above-captioned proceedings² ("July 23 Order"). This filing addresses certain issues related to the NYISO's March 2, 2001 filing of its Report After Fifteen Months of Operation. The NYISO requests that it have until October 30, 2002 to make the required compliance filing. Waiver of the Commission's regulations is requested to the extent necessary to permit the requested extension.

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).

² 100 FERC ¶ 61,107 (2002).

In the July 23 Order, the Commission directed the NYISO to make a compliance filing to provide certain additional information pertaining to the NYISO's Thunder Storm Alert ("TSA") procedures. Specifically, the Commissioner directed the NYISO,

to submit an analysis of its experience with its present method of addressing storm watch conditions as well as alternative options. NYISO must submit this analysis within 45 days of the date of this order. In this analysis, we require NYISO to include such information as how often thunderstorm procedures have been invoked for the loads in the East, information about the actual costs of the procedures, and how they have been in practice allocated.³

In addition, the Commission noted the complaints of Market Participants at their lack of input into the NYISO's 15-month report on TSA.⁴ Market Participant interest in this issue remains high and the issue has been recently listed on a Working Group agenda for on-going discussion.

NYISO staff have been working diligently to complete the analysis required by the Commission and discussing TSA-related issues with NYISO Market Participants. Additional time is needed, however, to analyze the data and develop the actual costs experienced on the system as a result of previous NYISO TSAs. In addition, more time is needed to present final data and analysis on actual costs to the Market Participants, to review with them the NYISO's conclusions on whether alternative cost allocation schemes are necessary or appropriate, and to consider their feedback. The NYISO anticipates that this process will take several additional weeks. As a result, the NYISO respectfully requests an extension of time from September 6, 2002 until October 30 2002 to make the compliance filing.

³ *Id.*

⁴ *Id.*

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 required by the July 23 Order from September 6, 2002 until October 30, 2002.

Respectfully submitted,

NEW YORK INDEPENDENT
SYSTEM OPERATOR, INC.

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September 5 2002

CERTIFICATE OF SERVICE

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

Dated at Washington, D.C. this 5th day of September, 2002.

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