

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

**Consolidated Edison Company of New York Inc.**

**Docket No. EL02-23-009,  
EL02-23-010,  
and EL02-23-011  
(not consolidated)**

v.

**Public Service Electric and Gas Company,  
PJM Interconnection, L.L.C., and  
New York Independent System Operator, Inc.**

**JOINT MOTION FOR EXTENSION OF TIME TO  
RESPOND TO STATUS REPORTS OF THE  
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.,  
NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.,  
PJM INTERCONNECTION, L.L.C., AND  
PUBLIC SERVICE ELECTRIC AND GAS COMPANY**

Pursuant to Rule 212 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212 (2004), the Consolidated Edison Company of New York, Inc. ("ConEd"), New York Independent System Operator, Inc. ("NYISO"), PJM Interconnection, L.L.C. ("PJM"), and Public Service Electric and Gas Company ("PSE&G") (together, the "Joint Movants") request a ten day extension of time, from January 20, to and including January 30, 2006, to respond to the status reports filed in the above-captioned dockets.

**I. STATEMENT OF ISSUES**

In compliance with Order No. 663,<sup>1</sup> the Joint Movants identify the issue raised by their motion:

1. *Should the Commission extend the deadlines for filing responsive pleadings in the three status report dockets by ten days?* The Joint Movants submit that the answer should be "yes" given the complexity of the issues raised by the status reports and the fact that there have been two federal holidays in the time since the status reports were filed.

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<sup>1</sup> *Revision of Rules of Practice and Procedure Regarding Issue Identification*, 112 FERC ¶ 61,297 (2005).

## II. JOINT MOTION

On December 30, 2005, ConEd, PSE&G, and the NYISO and PJM submitted separate status reports in the above-captioned dockets. Between January 11 and January 13, 2006, the Commission issued three separate notices setting January 20, 2006 as the deadline for filing motions or protests in all three status report dockets. The Joint Movants respectfully request that all three deadlines be extended until January 30, 2006.

A modest extension of time is warranted because of the complexity of the issues raised by some of the status reports and the possibility that one or more of the Joint Movants may wish to protest more than one of the reports. In addition, there have been two federal holidays in the time since the status reports were filed, which has significantly reduced the time available to prepare responsive pleadings. Granting a ten-day extension would give the Joint Movants approximately the same amount of time to respond to the December 30 status reports that they had to respond to the first round of status reports, which were filed on September 30, 2005.<sup>2</sup> The earlier reports raised fewer issues that are likely to be contested. Finally, no party will be prejudiced if the requested extension is granted.

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<sup>2</sup> The deadline for filing motions or protests in connection with those reports was October 27, 2005.

WHEREFORE, for the foregoing reasons, the Joint Movants respectfully request that the Commission grant their motion for an extension of time to and including January 30, 2006, to file motions or protests in the above captioned dockets.

Respectfully submitted,

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January 18, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2005).

Dated at Washington, DC this 18th day of January, 2006.

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