

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

Arizona Independent Scheduling) Docket No. ER00-3583-000
Administrator Association)

**MOTION FOR STAY OF THE ARIZONA
INDEPENDENT SCHEDULING ADMINISTRATOR ASSOCIATION**

The Arizona Independent Scheduling Administrator Association (“Az ISA”), pursuant to Rule 212 of the Federal Energy Regulatory Commission’s (“Commission’s”) Rules of Practice and Procedure, 18 C.F.R. ' 385.212, respectfully requests that the Commission grant the Az ISA an indefinite stay of the deadline for submittal of a compliance filing in the above-captioned docket. In support thereof, Az ISA states as follows:

By order issued November 30, 2000, the Commission issued an order in the above-captioned docket accepting in part, rejecting in part and directing modifications to the Az ISA Tariff and other documents related to the establishment of the Az ISA and the furtherance of retail electric competition in the state of Arizona. *See Arizona Independent Scheduling Administrator Association*, 93 FERC ¶ 61,231 (2000). This order required the Az ISA to submit a compliance filing on or before January 2, 2001. By orders issued December 28, 2000 and January 25, 2001, the Commission granted extensions of the January 2, 2001 deadline for submittal of the compliance filing in response to this order until February 5, 2001.

To date, no services have been provided under the Az ISA Tariff. On February 1, 2001, the Az ISA's Board of Directors met in an effort to agree upon a filing package consisting of the compliance filing, together with a related new Federal Power Act Section 205 filing, intended to allow services under the Az ISA Tariff to commence effective as of that date. Unfortunately, despite meeting for an entire day, the Az ISA's stakeholder board was unable to agree on the submittal of said filing package.¹

In a further effort to resolve this matter, the Board intends to meet with the Arizona Corporation Commission ("ACC") later this month in an effort to obtain further direction from the ACC. The Az ISA has already sent a letter to the ACC's Executive Secretary requesting said meeting and has also scheduled an additional Board meeting for February 21, 2001. However, as of the date of this filing, counsel for the Az ISA cannot speculate as to when, and if, the current impasse among the Board members will be resolved. Accordingly, the Az ISA respectfully requests that the FERC grant an indefinite stay of the compliance filing deadline. Recognizing the open-ended nature of this request, the Az ISA would also commit to providing the Commission with a status report on this matter on or before March 22, 2001 (45 days hence).

¹ The Az ISA Board voted 7-3 in favor of submitting the filing package to the FERC. Unfortunately, a dispute arose during the Board meeting as to whether, under the Az ISA Bylaws, in circumstances where one Board seat is empty, approval requires 7 or 8 affirmative votes. The Az ISA is attempting to resolve this issue prior to the next Board meeting.

WHEREFORE, for the foregoing reasons, the Arizona Independent Scheduling Administrator Association requests that the Commission stay the compliance filing deadline in the above-captioned docket.

Respectfully submitted,

ARIZONA INDEPENDENT SCHEDULING
ADMINISTRATOR ASSOCIATION

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Dated: February 5, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this 5th day of February, 2001, served the foregoing document upon all parties on the Service List established in this proceeding in accordance with Rule 2010 of the Commission's Rules of Practice and Procedure.

Barbara S. Jost