

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

Price Formation in Energy and)	Docket No. AD14-14-000
Ancillary Services Markets Operated)	
By Regional Transmission)	
Organizations and Independent)	
System Operators)	

**MOTION FOR EXTENSION OF TIME TO FILE
POST-TECHNICAL WORKSHOP COMMENTS OF THE
AMERICAN PUBLIC POWER ASSOCIATION, ELECTRIC POWER SUPPLY
ASSOCIATION AND NATIONAL RURAL ELECTRIC COOPERATIVE
ASSOCIATION**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or “Commission”),¹ the American Public Power Association (“APPA”),² Electric Power Supply Association (“EPSA”),³ and National Rural Electric Cooperative Association (“NRECA”)⁴ (jointly “Trade Associations”) respectfully request that the Commission extend the deadline for submitting comments in the above

¹ 18 C.F.R. §385.212 (2014)

² APPA is the national service organization representing the interests of not-for-profit, state, municipal and other locally owned electric utilities throughout the United States. More than 2,000 public power systems provide over 15 percent of all kWh sales to ultimate customers, and do business in every state except Hawaii. APPA utility members’ primary goal is providing customers in the communities they serve with reliable electric power and energy at the lowest reasonable cost, consistent with good environmental stewardship. This orientation aligns the interests of APPA-member electric utilities with the long-term interests of the residents and businesses in their communities. Collectively, public power systems serve over 47 million people.

³ EPSA is the national trade association representing leading competitive power supplies, including generators and marketers. Competitive suppliers, which collectively account for 40 percent of the installed generating capacity in the United States, provide reliable and competitively priced electricity from environmentally responsible facilities serving power markets. The comments contained in this filing represent the position of EPSA as an organization, but not necessarily the views of any particular member with respect to any issue.

⁴ NRECA is the national service organization for more than 900 not-for-profit rural electric cooperatives and public power districts providing retail electric service to more than 42 million customers in 47 states. NRECA’s members include consumer-owned local distribution systems and 65 generation and transmission cooperatives that supply wholesale power to their distribution cooperative owner-members. Both distribution and G&T cooperatives were formed to provide reliable electric service to their owner-members at the lowest reasonable cost.

captioned proceeding by fifteen days to March 6, 2015. On January 16, 2015, the Commission issued a “Notice Inviting Post-Technical Workshop Comments”⁵ inviting all interested parties to submit post-technical workshop comments on any or all of the questions listed in an 11-page attachment to the Notice no later than February 19, 2015. The Trade Associations request a short extension, directing comments to be filed by March 6, 2015. The Trade Associations do not intend to delay progress in this proceeding; rather, a short extension of fifteen days will allow interested parties to develop robust, helpful answers to the array of questions posed in the January 16th Notice.⁶

In the notice inviting comment, the Commission has posed twelve questions, each with a host of subparts, and each which could apply to any or all of the six Regional Transmission Organizations (“RTOs”) and Independent System Operators (“ISOs”). The questions are posed to follow up on a series of three all-day technical workshops held last fall to allow the Commission to gather information on and evaluate issues regarding price formation in energy and ancillary services markets operated by RTOs and ISOs.

The Trade Associations do not intend for a short extension to delay the Commission’s examination of the issues covered over the course of the three workshops. Addressing the manner in which energy and ancillary service prices are formed in the various RTO and ISO markets is a complicated matter, as

⁵ “Notice Inviting Post-Technical Workshop Comments,” *Price Formation in Energy and Ancillary Services Markets Operated by Regional Transmission Operators and Independent System Operators*, Docket No. AD14-14-000, issued January 16, 2015. (“Notice” or “January 16th Notice”)

⁶ The Edison Electric Institute (“EEI”), the trade association representing all U.S. investor-owned electric utilities, does not oppose the extension request of the Trade Associations; see EEI information at www.eei.org.

attested to by the discussions at the workshops. Therefore, in order to develop a full record with input from the range of stakeholders, an additional 15 days is requested. It is only in light of an extensive schedule of high level proceedings and events before the Commission over the coming weeks that the Trade Associations seek a short extension in this proceeding. Notably, the Trade Associations, as a group, request procedural extensions from the Commission very infrequently. Due to the complicated and technical nature of this proceeding, the groups believe additional time is warranted and will assist in the development of an extensive record to support Commission action on these issues.

WHEREFORE, APPA, EPSA and NRECA respectfully request that the Commission grant this Motion to extend the comment date by 15 days so that the filing deadline for answers and comments in this proceeding would be March 6, 2015.

Respectfully submitted,

/s/

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