

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

Building for the Future Through Electric) Docket No. RM21-17-000
Regional Transmission Planning and Cost)
Allocation and Generator Interconnection)

**MOTION OF THE ISO/RTO COUNCIL
FOR EXTENSION OF TIME TO SUBMIT COMMENTS**

Pursuant to Rules 212 and 2008 of the Federal Energy Regulatory Commission’s (“FERC” or the “Commission”) Rules of Practice and Procedure,¹ the ISO/RTO Council (“IRC”)² respectfully moves to extend the deadlines to submit initial comments in this proceeding from October 12, 2021 to December 1, 2021 (50 days), and reply comments from November 9, 2021 to January 31, 2022 (an additional 30 days to the original 30-day reply comment period).³

I. BACKGROUND

On July 15, 2021, the Commission issued the Advance Notice of Proposed Rulemaking (“ANOPR”) in the above-captioned proceeding, which presented potential reforms to improve electric regional transmission planning and cost allocation and generator interconnection processes. As relevant here, the Commission invited all interested persons to submit comments

¹ 18 C.F.R. §§ 385.212, 385.2008 (2021).

² The IRC comprises the following independent system operators (“ISOs”) and regional transmission organization (“RTOs”): Alberta Electric System Operator (“AESO”); California Independent System Operator (“CAISO”); Electric Reliability Council of Texas, Inc. (“ERCOT”); the Independent Electricity System Operator of Ontario, Inc. (“IESO”); ISO New England Inc. (“ISO-NE”); Midcontinent Independent System Operator, Inc. (“MISO”); New York Independent System Operator, Inc. (“NYISO”); PJM Interconnection, L.L.C. (“PJM”); and Southwest Power Pool, Inc. (“SPP”). ERCOT, AESO and IESO are not subject to the FERC’s jurisdiction and therefore do not join this filing.

³ See *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection*, 176 FERC ¶ 61,024 at P 183 (2021) (“ANOPR”). See also 86 FR 40266 (Jul. 27, 2021) (“Comments are due October 12, 2021 and Reply Comments are due November 9, 2021.”). Available here: <https://www.federalregister.gov/documents/2021/07/27/2021-15512/building-for-the-future-through-electric-regional-transmission-planning-and-cost-allocation-and->

on the potential reforms and in response to specific questions by October 12, 2021, with reply comments due November 9, 2021.⁴

II. MOTION FOR EXTENSION OF TIME TO SUBMIT COMMENTS

Pursuant to Rules 212 and 2008 of the Commission's Rules of Practice and Procedure,⁵ the IRC respectfully moves to extend the deadlines to submit comments in this proceeding from October 12, 2021 to December 1, 2021 (50 days), and reply comments from November 9, 2021 to January 31, 2022 (an additional 30 days). The Commission is authorized under Rule 2008 to extend "the time by which any person is required or allowed to act under any statute, rule, or order . . . for good cause, upon a motion made before the expiration of the period prescribed or previously extended."⁶ Good cause exists here to grant the requested extension. Although the IRC recognizes that comment requests are usually for periods of 30, 45, or 60 days, in this case a 45-day extension would fall during the Thanksgiving holidays. To avoid that conflict, the IRC proposes a 50-day extension with initial comments due on December 1. By the same token, the reply comment period that the Commission put forward is quite short, given the sheer number of questions asked and the number of potential responses to address. Accordingly, the IRC requests a 30-day extension of time so that the total reply comment period is 60 days, which will help to ensure a more thorough set of reply comments.

In justification of this request, the IRC points out that in consideration of the breadth and specificity of the potential reforms proposed in the ANOPR, the members of the IRC would benefit from the additional time both to develop their individual responses and to develop any alternative proposals for consideration in this proceeding. The ANOPR itself contains 182 substantive

⁴ *Id.*

⁵ 18 C.F.R. §§ 385.212, 385.2008.

⁶ *Id.* at 18 C.F.R. § 385.2008.

paragraphs, most with multiple questions presented that, in totality, seek to explore virtually every aspect of the fundamental pillars of the various RTO/ISO planning and interconnection processes, as well as the fundamental holdings of FERC Order Nos. 2003 and 1000. In addition, the ANOPR provides the opportunity for not only filing substantive responses to questions raised, but proposing alternative approaches to issues identified. The responses to the ANOPR will require a great deal of internal consideration to provide quality responses to the Commission. In addition, certain members of the IRC are already actively engaged in stakeholder processes aimed at examining issues similar to the potential reforms proposed in the ANOPR.⁷

Second, an extension of the reply comment period is similarly warranted. The IRC anticipates that a great number of stakeholders across the electric industry will respond to the ANOPR, including ISOs/RTOs, utilities, customer groups, industry associations, public interest organizations, regulators, and others. Respondents will need to review the likely voluminous individual submissions and draft responses to issues as appropriate. Accordingly, additional time to provide the Commission with thoughtful and well-developed responses will ultimately aid in any final determinations or other action taken in the course of this proceeding.

Third, the IRC is cognizant of the Commission's interest in scheduling Technical Conferences as well as working with the Joint FERC/State collaborative as part of this ANOPR. This request would not delay those efforts. Rather, those Technical Conferences and discussions, potentially held at points within this extended period, would further inform the quality of comments to be provided by interested parties.

⁷ For example, PJM's Interconnection Process Reform Task Force ("IPRTF") is actively discussing challenges related to the interconnection process and looking for opportunities to improve the process via the PJM's Consensus Based Issue Resolution ("CBIR") process. See <https://www.pjm.com/committees-and-groups/task-forces/iprtf>. MISO's Long Range Transmission Plan ("LRTP") is also addressing many of the same issues raised in the ANOPR. See Long Range Transmission Planning (misoenergy.org). Many of the individuals that will be reviewing and responding to the ANOPR are those that are developing the expected filing for LRTP to be submitted later this year.

III. CONCLUSION

In accordance with the foregoing, the IRC respectfully requests that the Commission grant this motion to extend the deadlines to submit comments in this proceeding from October 12, 2021 to December 1, 2021 (50 days), and reply comments from November 9, 2021 to January 31, 2022 (an additional 30 days to the original 30-day reply comment period). The IRC appreciates the Commission's consideration of this request.

Respectfully submitted,

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August 6, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have this 6th day of August, 2021 caused a copy of the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

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