

On April 19, 2010, NERC requested rehearing of the March 18 Order, requested a stay, and requested a public conference to provide an opportunity for NERC, stakeholders, and the Commission to discuss the issues underlying the March 18 Order. While NERC's rehearing request was pending with the Commission, FERC issued two Orders – one on June 15, 2010 and one on August 19, 2010 – granting NERC additional time to comply with the Commission's March 18, 2010 directives.² On September 16, 2010, FERC issued an Order denying NERC's request for rehearing, determining that its March 18, 2010 directives do not conflict with Section 215(d)(5) of the FPA. NERC must make a compliance filing responding to the Commission's March 18 directive to modify the standards process no later than December 13, 2010.

II. MOTION FOR EXTENSION

By this motion, NERC is requesting a ten-day extension of time to submit the December 13, 2010 compliance filing. With the ten-day extension, NERC will make the compliance filing no later than December 23, 2010. The additional time will allow NERC to consider the matter at a previously scheduled December 16, 2010 Board of Trustees meeting by conference call. NERC posted alternative proposed changes to its Rules of Procedure on October 18, 2010, for a 45-day comment period as required by Article XI, Section 2, of the NERC Bylaws. Given the complexities in developing modifications to the NERC Rules of Procedure in compliance with the Commission's March 18 directives, NERC anticipates that ten extra days to consider how to proceed in this matter will allow NERC sufficient time to address the directives with stakeholder and Board of Trustees participation.

² See, *Order Granting Extension of Time to Comply with Commission Directive*, 131 FERC ¶61,237 (June 15, 2010), and *North American Electric Reliability Corporation, Notice of Extension of Time*, Docket No. RR09-6-000 (August 19, 2010).

III. CONCLUSION

WHEREFORE, in consideration of the foregoing, NERC respectfully requests that FERC grant an extension of time up to and including December 23, 2010 for the submittal of a compliance filing in response to the Commission's March 18, 2010 Order.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 9th day of November, 2010.

/s/ Holly A. Hawkins
Holly A. Hawkins
*Attorney for North American Electric
Reliability Corporation*