

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

North American Electric Reliability Corporation)

Docket No. RM06-16-000

**MOTION FOR AN EXTENSION OF TIME
OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION**

Pursuant to Rules 212 and 2008 of the Federal Energy Regulatory Commission’s (“FERC”) Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.2008 (2008), the North American Electric Reliability Corporation (“NERC”) hereby submits a Motion for an Extension of Time from October 13, 2009 to October 28, 2009 to allow it to submit comments in response to FERC’s September 10, 2009 Notice¹ requesting comments on the Topological and Impedance Element Ranking (“TIER”) Report in the above-captioned proceeding. FERC’s Notice directed that comments be submitted on the TIER Report within 30 days after it is posted on the FERC website. The TIER Report was posted on the FERC website on September 11, 2009. Absent an extension, comments will be due to FERC by October 13, 2009.

FERC’s Office of Electric Reliability (“OER”) initiated the TIER study to aid in identifying and ranking the elements of the Bulk Power System in the United States, and FERC stated in its September 10, 2009 Notice that this project may lead to a methodology that could be utilized in future proceedings to aid in refining the scope of what constitutes the Bulk-Power System subject to Section 215 of the Federal Power Act (the “Act”).

Section 215 of the FPA and Section 39.1 of FERC’s regulations codified the term “Bulk Power System” to refer to those facilities and control systems necessary for operating an

¹ *Mandatory Reliability Standards For the Bulk-Power System*, Docket No. RM06-16-000 (September 10, 2009).

interconnected electric energy transmission network and electric energy from generating facilities needed to maintain transmission system reliability. However, prior to enactment of Section 215 of the FPA, NERC used the term “bulk electric system” to refer to the facilities subject to its planning and operating rules. In Order No. 693, FERC provided for an initial period in which FERC will rely on the NERC definition of bulk electric system and NERC’s registration process to provide as much certainty as possible regarding the applicability to and the responsibility of specific entities to comply with the Reliability Standards in the start-up phase of a mandatory Reliability Standard regime.² A transition to a new methodology, as proposed in the TIER Report, to determine what entities are subject to NERC registration and NERC Compliance could significantly affect the number of entities having to comply with NERC’s registration and compliance requirements. For this reason, NERC requires more time to appropriately analyze the TIER Report in order to determine its impacts on bulk power system reliability.

Additionally, while FERC posted the TIER Report for comment on September 11, 2009, the TIER Report was not publicly presented by its authors until September 22, 2009. During the public presentation, additional questions were introduced, which NERC plans to address in its written comments. Therefore, NERC requires additional time to file comments so that it can adequately address any additional questions arising from the September 22, 2009 public meeting.

² See Mandatory Reliability Standards for the Bulk-Power System, FERC Stats. & Regs. ¶ 31,242 (2007) (Order No. 693) at P 75, *reh’g denied*, 120 FERC ¶ 61,053 (2007) (Order No. 693-A).

Accordingly, NERC respectfully requests an extension of time to and including October 28, 2009, in the above-captioned FERC Docket, for the submittal of comments on the TIER Report to respond to FERC's September 10, 2009 Notice.

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 30th day of September, 2009.

/s/ Holly A. Hawkins

Holly A. Hawkins

*Attorney for North American Electric
Reliability Corporation*