# UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Cedar Creek Wind Energy, LLC Milford Wind Corridor Phase I, LLC Docket No. RC11-1-000 Docket No. RC11-2-000

### JOINT MOTION FOR EXTENSION OF TIME TO SUBMIT COMPLIANCE FILING

Pursuant to Rules 212 and 2008 of the Federal Energy Regulatory Commission's ("FERC" or the "Commission") Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.2008, the North American Electric Reliability Corporation ("NERC") and the Western Electricity Coordinating Council ("WECC") hereby submit a joint motion for extension of time from September 14, 2011 to November 14, 2011 to allow NERC to submit a compliance filing in response to the Commission's June 16, 2011 Order in the above-captioned proceeding. The Commission's Order upheld the registration of Cedar Creek Wind Energy, LLC ("Cedar Creek") and Milford Wind Corridor Phase I, LLC ("Milford") on the NERC Compliance Registry within the WECC region for the functions of Transmission Owner ("TO") and Transmission Operator ("TOP"). In addition, the Commission directed NERC to submit a compliance filing identifying the Reliability Standards and Requirements that will be applicable to Cedar Creek and Milford. NERC's compliance filing is due on September 14, 2011.

NERC and WECC met with each of Cedar Creek and Milford by telephone on a number of occasions<sup>2</sup> to discuss the applicable Reliability Standards and Requirements in accordance with the June 16 Order. Despite the diligent efforts to date, the parties are continuing to work on a number of remaining issues, and additional time is required to allow the parties to fully address

<sup>2</sup> Calls with Cedar Creek were held on August 5, 10 and 31, 2011. Calls with Milford were held on August 9, 19 and 26, 2011.

<sup>&</sup>lt;sup>1</sup> Cedar Creek Wind Energy, LLC et al., 135 FERC ¶ 61,241 (2011) ("June 16 Order").

them. Accordingly, the movants respectfully request an additional period of time to and including November 14, 2011 for the filing of the compliance filing. Counsel to Cedar Creek and Milford have authorized counsel to NERC to state that they do not oppose the requested 60 day extension of time.

WHEREFORE, in consideration of the foregoing, the movants respectfully request that the Commission grant an extension of time to and including November 14, 2011, for the submittal by NERC of a compliance filing in response to the Commission's June 16 Order.

## Respectfully submitted,

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Dated: September 13, 2011

# **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 13<sup>th</sup> day of September, 2011.

### /s/ Rebecca J. Michael

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