# UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation ) Docket No. RM09-19-000

## 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 (2010), the North American Electric Reliability Corporation ("NERC") hereby requests an extension of time from December 28, 2010 to January 11, 2011 (14 days) to submit a filing in the above referenced proceeding.

#### I. BACKGROUND

On June 17, 2009, NERC filed a Petition for Approval of Regional Reliability Standard IRO-006-WECC-1 — Qualified Transfer Path Unscheduled Flow Relief with the Commission for the Western Electricity Coordinating Council ("WECC") Region.<sup>1</sup> On October 21, 2010, the Commission issued a Notice of Proposed Rulemaking ("NOPR") that proposed to approve the regional standard and, as a separate action under section 215(d)(5) of the Federal Power Act ("FPA"), to direct WECC to develop modifications to the regional standard to address the issues identified in the body of the NOPR. <sup>2</sup> The NOPR also established a comment period ending on

<sup>&</sup>lt;sup>1</sup> Petition of The North American Electric Reliability Corporation for Approval of Proposed Western Electricity Coordinating Council Regional Reliability Standard IRO-006-WECC-1 Qualified Transfer Path Unscheduled Flow (USF) Relief. Docket No. RM00-19-000 (2009)

<sup>&</sup>lt;sup>2</sup> Western Electricity Coordinating Council Qualified Transfer Path Unscheduled Flow Relief Regional Reliability Standard. Docket No. RM09-19-000 (2010)

December 28, 2010 (60 days after publication in the Federal Register) requesting additional information on the standard.

NERC plans to submit comments on the NOPR in support of approval of the standard.

#### II. MOTION FOR EXTENSION

By this motion, NERC is requesting a fourteen day extension of time to submit comments on the proposed regional standard. With the fourteen day extension, NERC will make the filing no later than January 11, 2011. The additional time will give NERC and WECC staff sufficient time to coordinate on the NOPR comments, perform necessary analyses, and provide fully developed comments to assist the Commission in its review of the issues raised in the NOPR.

Additionally, because the comment period falls during the end-of-year holiday season, preparing well-developed comments without an extension of time would be difficult considering NERC and WECC staff essential to the analysis and formulation of comments have significant year-end responsibilities and/or have already committed to being out of the office or travelling during this period. Furthermore, an additional fourteen days to consider how to proceed on the development of these comments will allow NERC sufficient time to develop comments with stakeholder participation.

#### III. CONCLUSION

WHEREFORE, in consideration of the foregoing, NERC respectfully requests that FERC grant an extension of time up to and including January 11, 2011 for the submittal of comments on the IRO-006-WECC-1 Regional Reliability Standard.

### 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 17th day of December, 2010.

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