

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

Modernizing Wholesale Electricity)	Docket No. AD21-10-000
Market Design)	
)	
)	

**MOTION OF THE EDISON ELECTRIC INSTITUTE
FOR EXTENSION OF TIME TO SUBMIT COMMENTS
AND REQUEST FOR EXPEDITED TREATMENT**

Pursuant to Rule 212 of the Federal Energy Regulatory Commission’s (“Commission’s”) Rules of Practice and Procedure,¹ the Edison Electric Institute (“EEI”) submits this Motion to Extend the Period for Filing Comments (“Motion”) in response to the regional transmission organization and independent system operator (“RTO/ISO”) reports² filed in the above-referenced docket for an additional 30 days, until January 18, 2023. EEI makes this request to ensure stakeholders have sufficient time to evaluate the detailed information provided in the RTO/ISO reports.

EEI is the association that represents all investor-owned electric companies in the United States. Our members provide electricity for more than 235 million Americans and operate in all fifty states and the District of Columbia. As a whole, the electric power industry supports more than seven million jobs in communities across the United States. EEI members are united in their commitment to get the energy they provide as clean as they can, as fast as they can, while

¹ 18 C.F.R. § 385.212 (2022).

² The RTO/ISO reports consist of the following filings: Report of ISO New England Inc. in Response to Order Directing Reports, Docket No. AD21-10-000 (filed Oct. 18, 2022); Report of PJM Interconnection, L.L.C. in Response to Order Directing Reports, Docket No. AD21-10-000 (filed Oct. 18, 2022); Report of the California Independent System Operator Corporation, Docket No. AD21-10-000 (filed Oct. 18, 2022); Response of New York Independent System Operator, Inc. to Order Directing Reports, Docket No. AD21-10-000 (filed Oct. 18, 2022); Report on Modernizing Electricity Market Design of the Midcontinent Independent System Operator, Inc., Docket No. AD21-10-000 (filed Oct. 18, 2022); Report of Southwest Power Pool, Inc. in Response to Order Directing Reports, Docket No. AD21-10-000 (filed Oct. 18, 2022).

keeping reliability and affordability front and center, as always, for the customers and communities they serve.

I. COMMUNICATIONS

Please direct communications and correspondence concerning this Motion to:

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II. MOTION FOR EXTENSION OF COMMENT PERIOD

The RTO/ISO reports were filed on October 18, 2022 in response to the Commission's Order Directing Reports.³ The RTO/ISO reports contain information related to each RTO/ISO's wholesale markets, including information on reforms that would help each RTO/ISO meet changes in system needs. The Order Directing Reports stated that public comments in response to the RTO/ISO reports may be submitted within 60 days following the filing of the reports.⁴ EEI seeks a 30-day extension of the current deadline to file comments, from December 19, 2022, to January 18, 2023. Granting this extension of time will be in the public interest as any potential need for swift regulatory action is outweighed by the importance of developing a complete record prior to any potential Commission action.

The RTO/ISO reports contain extensive information on (1) current RTO/ISO system needs given changing resource mixes and load profiles; (2) how each RTO/ISO expects its system needs to change over the next five years and over the next 10 years; (3) whether and how

³ *Modernizing Wholesale Electricity Market Design*, 179 FERC ¶ 61,029 (2022) ("Order Directing Reports").

⁴ Order Directing Reports, P 1.

each RTO/ISO plans to reform its energy and ancillary services markets to meet expected system needs over the next five years and over the next 10 years; and (4) information about any other reforms, including capacity market reforms and any other resource adequacy reforms that would help each RTO/ISO meet changes in system needs. Given the detailed nature of the RTO/ISO reports, the importance of the issues raised therein (particularly while the Commission is engaged in a number of critical reform efforts related to the interstate transmission system), and the potentially reduced availability of many stakeholders during the comment period, the Commission has cause to extend the time for filing comments to ensure all stakeholders have an adequate opportunity to consider and respond to the RTO/ISO reports. This extension will provide the stakeholders with valuable time to meaningfully respond to the RTO/ISO reports, and will help provide the Commission with a robust record prior to considering whether further action is appropriate.

III. REQUEST FOR EXPEDITED TREATMENT

EEI respectfully requests that the Commission act on this motion by no later than December 7, 2022, and in doing so, make a reduction in the comment period for the filing of answers to this motion to reflect this request for expedited treatment. EEI requests the Commission allow for a three-day period for answers to this motion⁵ to ensure that the Commission can act on this motion within the time requested. If the Commission is not inclined to grant the extension, interested parties need certainty in this regard as soon as possible so that they can plan accordingly.

⁵ 18 C.F.R. § 385.213(d).

IV. CONCLUSION

WHEREFORE, for the foregoing reasons, EEI respectfully requests that the Commission grant this Motion to provide for an additional 30 days to file comments in this docket, until January 18, 2023.

Respectfully submitted,

/s/ Christopher M. Randall

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November 30, 2022

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 30th day of November 2022.

/s/ Christopher M. Randall

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