

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

**Enhancement of Electricity Market Surveillance) Docket No. RM11-17-000
and Analysis through Ongoing Electronic)
Delivery of Data from Regional Transmission)
Organizations and Independent System Operators)**

**MOTION OF THE ISO/RTO COUNCIL
FOR AN EXTENSION OF TIME TO FILE COMMENTS**

Pursuant to Rule 212 of the Federal Energy Regulatory Commission’s

(“Commission”) Rules of Practice and Procedure, 18 C.F.R. § 385.212, the ISO/RTO Council (“IRC”)¹ hereby respectfully submits this Motion for an Extension of Time to File Comments to the Commission’s Notice of Proposed Rulemaking regarding the Enhancement of Electricity Market Surveillance and Analysis through Ongoing Electronic Delivery of Data from Regional Transmission Organizations and Independent System Operators (“NOPR”) for an additional 30 days, until January 26, 2012.² The IRC makes this request to ensure that its ISO/RTO members have sufficient time to evaluate the issues identified in the NOPR, and to provide, as a group,

¹ The IRC is comprised of the Alberta Electric System Operator (“AESO”); California Independent System Operator (“CAISO”); Electric Reliability Council of Texas (“ERCOT”); the Independent Electricity System Operator of Ontario, Inc. (“IESO”); ISO New England Inc. (“ISO-NE”); Midwest Independent Transmission System Operator, Inc. (“MISO”); New York Independent System Operator, Inc. (“NYISO”); PJM Interconnection, L.L.C. (“PJM”); Southwest Power Pool, Inc. (“SPP”); and New Brunswick System Operator (“NBSO”). The IRC’s mission is to work collaboratively to develop effective processes, tools and standard methods for improving the competitive electricity markets across North America. In fulfilling this mission, it is the IRC’s goal to provide a perspective that balances reliability standards with market practices so that each complements the other, thereby resulting in efficient, robust markets that provide competitive and reliable service to customers. IRC members conduct their operations in compliance with the NERC Reliability Standards. IRC members operate the bulk power system, administer the organized wholesale electricity markets, and act as the planning authorities within their respective regions. The AESO, IESO, and NBSO are not subject to the Commission’s jurisdiction, and are not joining in these comments. Other than with reference to enforcement of reliability standards, ERCOT is not subject to this Commission’s jurisdiction and as a result is not joining these comments.

² *Enhancement of Electricity Market Surveillance and Analysis through Ongoing Electronic Delivery of Data from Regional Transmission Organizations and Independent System Operators*, Notice of Proposed Rulemaking, Docket No. RM11-17-000, 137 FERC ¶ 61,066 (October 20, 2011).

more fully developed comments and comprehensive potential solutions to assist the Commission in its review of the issues raised in the NOPR. In order to provide a coordinated, solutions-based approach to the issues raised in the NOPR, the IRC will need this extension of time to consult with its member ISO/RTOs through conference calls and meetings - the scheduling of which during this end-of-year/holiday period will prove difficult.

The IRC believes both its member ISO/RTOs and the larger stakeholder community they serve, along with the Commission, will benefit from the additional time requested, and that the end result of granting this request will be more focused comments and comprehensive proposals to meet the Commission's legitimate interest in receiving additional market data from the RTOs.

The IRC believes that the grant of a 30-day extension of the deadline for filing comments on the NOPR will not have a significant effect on the Commission's ability to establish final rules in a timely manner. Nor will an extension of time prejudice any party.

I. REQUEST FOR SHORTENED TIME TO RESPOND TO THIS MOTION

Under Rule 213 of the Commission's Rules of Practice and Procedure, parties have 15 days in which to file answers to motions, unless otherwise provided by the Commission. In as much as it is important for potential comments to know the comment deadline as soon as possible given the end-of-year period and holiday season, expedited action on this motion is appropriate. The IRC therefore requests that the Commission shorten to three business days the time for filing answers to this Motion.

II. COMMUNICATIONS

The following individuals are designated for inclusion on the official service list in this proceeding and for receipt of any communications regarding this filing:

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III. CONCLUSION

For the foregoing reasons, the IRC respectfully requests the Commission to grant this Motion to provide for an additional 30 days, until January 26, 2012, to file comments to the NOPR in this docket.

Respectfully submitted,

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Dated: December 9, 2011

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 Norristown, PA, this 9th day of December, 2011.

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