

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

**Revisions to the Filing Process
and Data Collection for the
Electric Quarterly Report**)
)
)

Docket No. RM23-9-000

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

Pursuant to Rules 212 and 2008 of the Federal Energy Regulatory Commission’s (“FERC” or the “Commission”) Rules of Practice and Procedure,¹ the ISO/RTO Council (“IRC”)² respectfully moves to extend the deadlines to submit initial comments in this proceeding from December 26, 2023 to February 26, 2024 (60 Days).³

I. BACKGROUND

On October 19, 2023, the Commission issued the Notice of Proposed Rulemaking (“NOPR”) in the above-captioned proceeding, which presented proposed changes to the Electric Quarterly Report (“EQR”) filing requirements, including both the method of collection and the data being collected. The Commission invited interested persons to submit comments on the proposed changes, including any related matters or alternative proposals, by December 26, 2023.⁴

¹ 18 C.F.R. §§ 385.212, 385.2008.

² The IRC comprises the following independent system operators (“ISOs”) and regional transmission organizations (“RTOs”): Alberta Electric System Operator (“AESO”); California Independent System Operator (“CAISO”); Electric Reliability Council of Texas, Inc. (“ERCOT”); the Independent Electricity System Operator of Ontario, Inc. (“IESO”); ISO New England Inc. (“ISO-NE”); Midcontinent Independent System Operator, Inc. (“MISO”); New York Independent System Operator, Inc. (“NYISO”); PJM Interconnection, L.L.C. (“PJM”); and Southwest Power Pool, Inc. (“SPP”). ERCOT, AESO, and IESO are not subject to the FERC’s jurisdiction and therefore do not join this filing.

³ See *Revisions to the Filing Process and Data Collection for the Electric Quarterly Report*, 185 FERC ¶ 61,043 at P 145 (2023) (“NOPR”). See also 88 FR 73784 (October 27, 2023) (“Comments are due December 26, 2023). Available at: <https://www.federalregister.gov/documents/2023/10/27/2023-23592/filing-process-and-data-collection-for-the-electric-quarterly-report>.

⁴ *Id.*

II. MOTION FOR EXTENSION OF TIME TO SUBMIT COMMENTS

Pursuant to Rule 2008, “the time by which any person is required or allowed to act under any statute, rule, or order may be extended by the decisional authority for good cause, upon a motion made before the expiration of the period prescribed or previously extended.”⁵ The IRC submits that good cause exists to grant the requested extension in this circumstance, for the following reasons.

First, additional time beyond the specified 60 days will afford the IRC members additional opportunity to determine the scope of the NOPR and its effect on EQR processes. The NOPR asked parties to assess the impact of the proposed changes on various technical reports that are maintained and populated by a number of internal parties and through various software systems. In consideration of the time necessary to determine the impact of the proposed changes on each individual filing process, the IRC members would benefit from an extension to the current comment date. Additional time will allow the IRC members to have a better understanding of the implications of the proposed revisions across their individual organizations and to develop more complete responses to FERC’s proposal, to address specific questions posed in the NOPR, and to create alternative proposals for consideration, if necessary.

Second, the IRC members recognize the difficulty in gathering numerous internal parties for multiple conversations over the Thanksgiving and winter holidays. The current comment deadline falls on December 26, 2023, when many individuals are unavailable, and potentially requiring parties to file the week prior in order to meet the comment deadline. A 60-day extension to the comment deadline will help ensure that the IRC members have meaningful conversations with their EQR subject matter experts in developing comments on the NOPR.

⁵ 18 C.F.R. § 385.2008(a).

III. CONCLUSION

In accordance with the foregoing, the IRC respectfully requests that the Commission grant this motion to extend the deadline to submit comments in this proceeding from December 26, 2023, to February 26, 2024 (60 Days). The IRC appreciates the Commission's consideration of this request.

Respectfully submitted,

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DATED: November 27, 2023

CERTIFICATE OF SERVICE

I hereby certify that I have this day e-served a copy of this document upon all parties listed on the official service list compiled by the Secretary in the above-captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated this 27th day of November, 2023 in Carmel, Indiana.

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