

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

Marble River, LLC)	
)	
Complainant)	
)	
v.)	
)	Docket No. EL13-20-000
Noble Clinton Windpark I, LLC,)	
Noble Ellenburg Windpark, LLC,)	
Noble Chateaugay Windpark, LLC,)	
New York Independent System)	
)	
Operator, Inc.)	
)	
Respondents)	

**JOINT MOTION OF PARTIES FOR DEFERRAL OF
COMMENT PERIOD AND REQUEST FOR EXPEDITED ACTION**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (FERC or Commission), 18 C.F.R. § 385.212 (2012), Marble River, LLC (Marble River), Noble Clinton Windpark I, LLC, Noble Ellenburg Windpark, LLC, Noble Chateaugay Windpark, LLC (collectively, Noble), and the New York Independent System Operator, Inc. (NYISO) (Marble River, Noble, and NYISO collectively, the Parties) hereby jointly move to defer the comment period in this proceeding from the December 5, 2012 deadline for filing answers, interventions, and comments in response to Marble River's complaint to January 25, 2013. The temporary deferral will allow the Parties to attempt to negotiate a resolution of their dispute. Due to the imminence of the December 5 comment deadline, the Parties also request expeditious Commission action on this motion.

As noted in its November 15, 2012 complaint, Marble River and Noble have had prior discussions regarding the issues presented in this case that did not result in the resolution of those issues. Accordingly, Marble River represented in the complaint that alternative dispute resolution procedures are not likely to be useful in the resolution of this case. However, since the complaint was filed, Marble River, Noble, and NYISO have agreed to attempt to resolve the case informally. To the extent that the Parties can resolve their dispute in this manner, there will be no need for a Commission determination of the issues. Therefore, the Parties respectfully request a temporary deferral of the comment period until January 25, 2013 to allow the Parties the opportunity to achieve a negotiated resolution of the dispute. The Parties will notify the Commission as to the need for further procedures prior to expiration of the requested deferral.

WHEREFORE, for the reasons set forth herein, the Parties jointly request that the Commission defer the comment period in this proceeding until January 25, 2013. The Parties further request that the Commission act on this motion in an expeditious manner.

Respectfully submitted,

/s/ Margaret A. Moore

Margaret A. Moore

Jessica C. Friedman

Van Ness Feldman, LLP

1050 Thomas Jefferson St., NW

Washington, DC 20007

Tel: (202) 298-1800

Fax: (202) 338-2416

mam@vnf.com

jcf@vnf.com

Attorneys for Marble River, LLC

/s/ Mark C. Williams

Mark C. Williams
Bingham McCutchen LLP
2020 K Street NW
Washington DC 20006
Tel: (202)373.6181
Fax: (202) 373.6001
mark.williams@bingham.com

Michael J. Palmieri Esq.
Senior Vice President and General Counsel
Noble Environmental Power, LLC
8 Railroad Avenue
Essex, CT 06426
Tel: (860) 581.5010

Attorneys for Noble Clinton Windpark I,
LLC, Noble Ellenburg Windpark, LLC,
Noble Chateaugay Windpark, LLC

/s/ Karen Georgenson Gach

Robert E. Fernandez, General Counsel
Raymond Stalter, Director of Regulatory Affairs
*Karen Georgenson Gach, Deputy General
Counsel

*Sara B. Keegan, Senior Attorney
New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, NY 12144
Tel: (518) 356-6000
Fax: (518) 356-4702

kgach@nyiso.com

skeegan@nyiso.com

Counsel for the New York Independent System
Operator, Inc.

Dated: November 29, 2012

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 in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure, 18 C.F.R. §385.2010.

Dated at Rensselaer, New York, this 29th day of November, 2012.

/s/ Joy A. Zimmerlin

Joy A. Zimmerlin

New York Independent System Operator, Inc.

10 Krey Blvd.

Rensselaer, NY 12144

(518) 356-6207