

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

**Electric Storage Participation in
Regions with Organized Wholesale
Electric Markets**

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Docket No. AD16-20-000

MOTION FOR EXTENSION OF TIME OF THE ISO/RTO COUNCIL

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”),¹ the ISO/RTO Council (“IRC”)² respectfully requests a modest extension of time - to May 23, 2016³ - to respond to the data request issued by the Commission on April 11, 2016 in the above-referenced docket.⁴ The IRC also requests a shortened comment period in response to this Motion given that the current due date of May 2, 2016 is less than two weeks away.

I. MOTION FOR EXTENSION OF TIME

In the Storage Data Request, the Commission directed each FERC-jurisdictional regional transmission organization (“RTO”) and independent system operator (“ISO”) to publicly provide

¹ 18 C.F.R. § 385.212 (2015).

² The IRC is comprised of the Alberta Electric System Operator (“AESO”), the California Independent System Operator Corporation (“CAISO”), the Electric Reliability Council of Texas, Inc. (“ERCOT”), the Independent Electricity System Operator (“IESO”), ISO New England Inc. (“ISO-NE”), the Midcontinent Independent System Operator, Inc. (“MISO”), the New York Independent System Operator, Inc. (“NYISO”), PJM Interconnection, L.L.C. (“PJM”), and the Southwest Power Pool, Inc. (“SPP”). ERCOT, AESO, and IESO are not FERC-jurisdictional and are not joining in this Motion.

³ Certain RTOs intend to provide responses to the questions on a rolling basis and may not need the full extension to respond to all of the requests.

⁴ *Electric Storage Participation in Regions with Organized Wholesale Electric Markets*, Commission Docket No. AD16-20-000 (issued April 11, 2016) (“Storage Data Request”).

information related to the participation of electric storage resources in the markets operated by the RTO or ISO. The Commission's questions are grouped into six general categories: (1) the eligibility of electric storage resources to be market participants, (2) the qualification criteria and performance requirements for electric storage resources, (3) the bid parameters for electric storage resources, (4) distribution-connected and aggregated electric storage resources, (5) when electric storage resources are receiving electricity, and (6) potential rule changes affecting electric storage resources. The Commission directed the ISO/RTOs to submit responses to the Storage Data Request by May 2, 2016 - three weeks from the date of its issuance.

The IRC agrees that understanding and clarifying how electric storage resources can participate in markets operated by RTOs and ISOs is both important and timely. Indeed, each of the IRC members is already working toward providing clear and full responses to the Commission's questions, and stands ready to assist the Commission in developing any necessary market rule enhancements to accommodate electric storage resources. Nevertheless, the IRC believes that additional time is needed to fully respond to the Storage Data Request.

Specifically, the questions in the Storage Data Request cover a large amount of very detailed information. Many of the questions must be answered for each resource type in each of the various markets (capacity, energy, and ancillary services). This work alone will entail close analysis of market data and the applicable operational and market rules. Moreover, given that the Commission also requests the rationales and bases for responses, additional time beyond gathering facts and figures will be required to perform the necessary analysis to formulate complete answers.

For these reasons, the IRC respectfully requests that the Commission extend the deadline for responses to the Storage Data Request by 21 days, to May 23, 2016. This limited extension

of time will allow the RTOs and ISOs the necessary time to develop thorough and accurate responses to the Commission's questions, which will improve the quality of the information available to the Commission to address these important issues.

The Commission indicated in the Storage Data Request that the responses will be used in examining whether rates associated with electric storage resources are unjust and unreasonable and whether tariff changes are warranted. These are important issues that could impact market efficiency, both in terms of design and operation. Accordingly, it is critical to allow sufficient time to fully develop complete responses to the Commission's queries to facilitate informed and appropriate action by the Commission. This will, in turn, allow other interested parties to develop their own comments taking into account the responses of the RTOs and ISOs to the Storage Data Request. Finally, the requested extension will not adversely affect any party. The Storage Data Request is directed initially to the FERC-jurisdictional IRC members, all of which support this Motion for an extension of time for the reasons stated above.

The IRC also requests that the Commission provide a commensurate extension to the deadline for additional comments from other parties. Granting the extension for additional comments will preserve the rights of other parties, and those parties would also benefit from the requested extension for the ISO/RTO responses, because, similar to the Commission, those entities will benefit from the more well developed responses that the ISOs/RTOs will be able to provide due to the modest filing extension.

The IRC also requests that the Commission waive the 15-day answer period set forth in Rule 213 of the Commission's Rules of Practice and Procedures given that the current due date is less than two weeks from the date this Motion is filed. The IRC respectfully requests that parties be provided an opportunity to submit comments in response to this Motion no later than April

22, 2016 so that the Commission may issue an order by April 27, 2016, less than a week prior to the current due date. No party will be prejudiced were the Commission to grant this request because it will provide all ISOs and RTOs adequate time to prepare and submit their responses to the Commission's Storage Data Request. As discussed above, the IRC believes that granting the request will actually benefit all parties, including the Commission, by enhancing the record that will inform actions related to this important issue.

II. CONCLUSION

WHEREFORE, the IRC respectfully asks that the Commission: (1) grant the IRC's motion for an extension of time to allow the ISOs and RTOs until May 23, 2016, to respond to the Commission's Storage Data Request, as well as a commensurate extension to the deadline for additional comments from other parties; and (2) grant the requested shortened comment period to enable the Commission to issue an order in response to this Motion by April 27, 2016.

Respectfully submitted,

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Dated: April 20, 2016

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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 Holyoke, Massachusetts this 20th day of April, 2016.

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