

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

**Electric Storage Participation in
Markets Operated by Regional
Transmission Organizations and
Independent System Operators**

Docket No. RM16-23-000

**COMMENTS OF THE ISO/RTO COUNCIL
IN SUPPORT OF MOTIONS TO EXTEND THE COMMENT PERIOD**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.212 (2016), the ISO/RTO Council (“IRC”)¹ respectfully submits these Comments in support of motions to extend the period for filing comments in response to the Notice of Proposed Rulemaking (“Notice”) in the abovecaptioned dockets to February 28, 2017.²

I. COMMENTS

The IRC believes that an extended comment period will enable better preparation of more detailed responses to the myriad issues the Commission raised in its Notice. The Notice addresses two emerging and complex areas of interest to the industry: energy storage

¹ 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 these Comments.

² The IRC supports the motions for extension of time filed by: (1) National Hydropower Association (“NHA”), and (2) American Public Power Association, and the Edison Electric Institute, Large Public Power Council, National Rural Electric Cooperative Association, and the National Association of Regulatory Utility Commissioners (“the Trade Associations”).

participation and the aggregation of distributed energy resources to participate in wholesale markets. In each of these topics, the Commission poses a number of complicated questions for which the IRC's members need more time to respond adequately. These topics are of critical importance to the future of the energy industry, and therefore warrant additional consideration by all commenters. The IRC also notes that the comment period currently includes the holiday and end-of-the-year season.

The extension will ensure that the IRC, its members, and all other commenters have sufficient time to prepare and coordinate reasoned comments to address these complex and important issues that will inform the Commission in developing any final rule. The 29-day extension is relatively short and will not delay the exploration and resolution of the issues presented in the Notice unduly, nor will any parties be prejudiced.

II. CONCLUSION

For the foregoing reasons, the IRC respectfully requests that the Commission grant the Motions submitted by the NHA and the Trade Associations to extend the period for filing comments in this docket to February 28, 2017.

Respectfully submitted,

/s/ Anna McKenna

Roger E. Collanton, General Counsel
Anna McKenna
Assistant General Counsel, Regulatory
California Independent System Operator Corporation
250 Outcropping Way
Folsom, California 95630
amckenna@caiso.com

/s/ Margoth Caley

Raymond W. Hepper
Vice President, General Counsel, and Secretary
Theodore J. Paradise
Assistant General Counsel, Operations and Planning
Margoth Caley
Senior Regulatory Counsel
ISO New England Inc.
One Sullivan Road
Holyoke, Massachusetts 01040
mcaley@io-ne.com

/s/ Stephen G. Kozey

Stephen G. Kozey
Senior Vice President
Midcontinent Independent System Operator, Inc.
720 City Center Drive
Carmel, Indiana 46032
stevekozey@misoenergy.org

/s/ Carl Patka

Robert E. Fernandez, General Counsel
Raymond Stalter, Director of Regulatory Affairs
Carl Patka, Assistant General Counsel
New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, NY 12144
cpatka@nyiso.com

/s/ Craig Glazer

Craig Glazer
Vice President-Federal Government Policy
James M. Burlew Senior Counsel
PJM Interconnection, L.L.C.
Suite 600
1200 G Street, N.W.
Washington, D.C. 20005
202-423-4743
Craig.Glazer@pjm.com
James.Burlew@pjm.com

/s/ Joseph W. Ghormley

Paul Suskie
Senior Vice President, Regulatory Policy and General Counsel
Joseph W. Ghormley
Senior Attorney
Southwest Power Pool, Inc.
201 Worthen Drive
Little Rock, Arkansas 72223
jghormley@spp.org

December 20, 2016

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. § 385.2012).

Dated this 20th day of December, 2016 in Folsom, California.

/s/ Martha Sedgley
Martha Sedgley