

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

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| <p style="text-align:right">)</p> <p>Price Formation in Energy and Ancillary) Services Markets Operated by Regional) Transmission Organizations and) Independent System Operators)</p> | <p>Docket No. AD15-14-000</p> |
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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), 18 C.F.R. § 385.212 (2015), the ISO/RTO Council (IRC)¹ respectfully requests an extension of time to respond by March 4, 2016 to the Order Directing Reports issued by the Commission on November 20, 2015, in the above referenced docket.² The IRC also requests a shortened comment period in response to this Motion given that the due date is less than three weeks away.

I. MOTION FOR EXTENSION OF TIME

In the Order Directing Reports, the Commission directed all regional transmission organizations (RTOs) and independent system operators (ISOs) to publicly provide information related to certain price formation issues. Specifically, the Commission seeks information in a report from each RTO/ISO regarding five price formation issues: (1) pricing of fast-start resources; (2) commitments to manage multiple contingencies; (3) look-ahead modeling; (4)

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 this Motion.

² *Price Formation in Energy and Ancillary Services Markets Operated by Regional Transmission Organizations and Independent System Operators Order*, 153 FERC ¶ 61,221(2015) (Order Directing Reports).

uplift allocation; and (5) transparency. The Commission requested that the ISO/RTOs submit their reports within 75 days of the issuance of the Order Directing Reports.

The FERC-jurisdictional IRC members intend to respond to the Commission's order fully and assist the Commission in developing any necessary market rule enhancements in the five areas of focus in the Commission's Order Directing Reports. All have taken steps towards completing their responses. However, because of the confluence of holiday schedules, and because the order came at a time when some of the ISOs and RTOs were engaged in implementing or developing important market enhancements, some will not be able to complete their responses by February 3, 2016, the due date.

The nature of the Commission's requests requires that the ISO and RTOs conduct additional research and analysis. First, the Commission asks for a set of robust responses that not only describe the specific features as they apply to each ISO and RTO but also "the reasons for RTOs/ISOs choosing a particular design for each process."³ While the description of the features is more readily available, many of the market features were adopted a number of years ago through separate Commission proceedings. In some cases, the ISO and RTOs must research and review those proceedings to reflect accurately the policy rational for adopting the feature.

Second, in several of the questions, the Commission asks that the ISOs and RTOs provide data that require studies or analysis to produce the data beyond what is readily available. For example, the Commission asks that with respect to how the ISO or RTO manages multiple contingencies, the ISO or RTO should provide for each month during a twelve-month period: (1) an estimate of the number of resource commitments made in real-time or day-ahead to address multiple contingencies; and (2) an estimate of the dollar amount of uplift paid to resources

³ Order Directing Reports at P 4.

committed to address multiple contingencies.⁴ The Commission asks that this estimate should be broken down by geographic area, if possible. Similarly, related to how the RTO or ISO allocates real-time energy and ancillary services market uplift to market participants, the Commission asks that for a period of twelve months the ISO or RTO report on the share of day-ahead energy and ancillary services market uplift (in percentage terms) allocated to each category of entities to whom they allocate these amounts.⁵ The ISO and RTOs do not all have this data readily available and must collect the data, analyze it, and determine how to best present it to the Commission in a comprehensive manner.

For these reasons, the IRC respectfully requests a modest extension of 30 days from February 3, 2016, so that the members can all complete the responses by March 4, 2016.

The extension does not adversely affect any party. All of the parties affected by the Order Directing Reports are members of the IRC. While some are further along in completing their responses, none of the members oppose this Motion for an extension of time. The modest extension will provide the parties additional time to finalize their responses accurately and more completely. The IRC agrees with the Commission that the data provided in response to the Order Directing Reports is necessary to evaluate issues regarding price formation in the energy and ancillary services markets operated by RTOs/ISOs. As the Commission stated, the benefit of collecting this information in this forum is that the Commission, RTOs/ISOs, and stakeholders will be able to compare practices across markets while they proceed towards evaluating these complex issues and inter-related market features. It is important that the ISO's and RTOs have adequate time to provide robust and complete responses to ensure that the Commission, the

⁴ *Id.*, at P 43.

⁵ *Id.*, at P 64.

ISOs/RTOs, and stakeholders are adequately informed of the intricacies of each market design and feature prior to commencing their evaluation in this proceeding.

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 three 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 January 21, 2016 so that the Commission may issue an order by January 28, 2016, just 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 Order Directing Reports, if they so need it.

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 up to March 4, 2016, to respond to the Commission's Order Directing Reports; and (2) grant the requested shortened comment period to enable the Commission to issue an order in response to this Motion by January 28, 2016.

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