

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

New York Independent System Operator, Inc.

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Docket No. ER13-102-000

**MOTION FOR EXTENSION OF TIME TO ANSWER OF
THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC. AND
THE NEW YORK TRANSMISSION OWNERS**

Pursuant to Rules 101(e), 212, and 2008(a) of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”),¹ the New York Independent System Operator, Inc. (“NYISO”) and the New York Transmission Owners² (collectively, the “Filing Parties”) respectfully submit this motion seeking, to the extent the Commission deems necessary, an extension of time to answer the filings submitted in response to the Filing Parties’ October 15, 2013, compliance filing regarding the Order No. 1000 intra-regional transmission planning requirements (“October 2013 Filing”).³ In response to the numerous filings submitted on November 14, 2013, in the above-captioned docket in response to the October 2013 Filing, the Filing Parties will require adequate time to review and develop a full response. The Filing Parties respectfully request that the Commission allow thirty (30) days for answers in response to the November 14 filings, providing for a due date of Monday, December 16.⁴

¹ 18 C.F.R. §§ 385.101(2), 385.212, and 385.2008(a).

² The New York Transmission Owners are Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Long Island Lighting Company d/b/a LIPA, New York Power Authority, New York State Electric & Gas Corp., Niagara Mohawk Power Corp. d/b/a National Grid, Rochester Gas & Electric Corp., and Orange & Rockland Utilities, Inc.

³ *New York Independent System Operator, Inc. and New York Transmission Owners*, Compliance Filing, Docket No. ER13-102-000 (October 15, 2013).

⁴ The thirty day period would actually end on Saturday, December 14, so the Filing Parties propose to submit their answer on the following Monday.

I. BACKGROUND

On October 11, 2012, the Filing Parties submitted proposed revisions to the NYISO's Open Access Transmission Tariff and Market Administration and Control Area Services Tariff to comply with the Order No. 1000 intra-regional transmission planning requirements.⁵ In an April 18, 2013, order, the Commission accepted the Filing Parties' proposed revisions in part and directed them to submit a further compliance filing to make certain tariff revisions and provide additional support for certain compliance proposals.⁶ On October 15, 2013, the Filing Parties filed their further compliance filing addressing the Commission's directives in its April 18 order. Comments in response to the October 2013 Filing were due on November 14, 2013.

II. MOTION FOR EXTENSION OF TIME FOR ANSWER

To the extent that the Commission determines that Rule 213(d) of its Rules of Practice and Procedures establishes a fifteen (15) day period for answering the November 14 Filings,⁷ the Filing Parties respectfully request that the Commission allow a fifteen day extension so that answers would be accepted until Monday, December 16. In accordance with Rules 2008(a) and 101(e), good cause exists for the Commission to allow an extension of the answer period.⁸

In response to the October 2013 Filing, seven filings were submitted on November 14 by the following entities: Multiple Intervenors; Independent Power Producers of New York, Inc.; Entergy Nuclear Power Marketing, LLC; NextEra Energy Resources, LLC; LS Power

⁵ *New York Independent System Operator, Inc. and New York Transmission Owners*, Compliance Filing, Docket Nos. RM10-23-000, ER13-102-000 (October 11, 2012).

⁶ *New York Independent System Operator, Inc.*, 143 FERC ¶ 61,059 (2013).

⁷ 18 C.F.R. § 385.213(d)(1).

⁸ 18 C.F.R. § 385.2008(a) (providing that "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"); 18 C.F.R. § 385.101(e) (providing that "the Commission may, for good cause, waive any provision of this part or prescribe any alternative procedures that it determines to be appropriate").

Transmission, LLC and LSP Transmission Holdings, LLC; the New York State Public Service Commission; the Long Island Power Authority and LIPA; and the New York Transmission Owners. These filings make numerous assertions regarding significant and complex issues addressed in the October 2013 Filing. Absent the requested answer period, the Filing Parties will be required to review and develop a response to the extensive assertions made in these filings in a limited period of time. Moreover, a fifteen day answer period, to the extent applicable, would result in a due date the day after the Thanksgiving holiday, further truncating the Filing Parties' timeframe for responding and limiting the availability of personnel required to present the Commission with a full response.

Allowing additional time for the submission of an answer will provide the relevant personnel involved in the development of the Filing Parties' October 2013 Filing the ability to carefully review and provide thorough, responsive comments. This will improve the quality of information before the Commission as it rules on the October 2013 Filing. Moreover, as the answer is expected to take the form of a joint filing, the additional time will also provide the NYISO and the New York Transmission Owners with an adequate opportunity to coordinate the development of a joint response.

III. CONCLUSION

For the reasons set forth above, the Filing Parties respectfully request that the Commission allow a thirty (30) day period for their answer to the filings submitted in response to the October 2013 Filing.

Respectfully submitted,

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November 18, 2013

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing document to be served 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 Commission Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2013).

Dated at Washington, D.C. this 18th day of November 2013.

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