

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

Industrial Energy Consumers of America,)
American Forest & Paper Association, R Street)
Institute, Glass Packaging Institute, Public Citizen,)
PJM Industrial Customer Coalition, Coalition of)
MISO Transmission Customers, Association of)
Businesses Advocating for Tariff Equity, Carolina)
Utility Customers Association, Inc., Pennsylvania)
Energy Consumer Alliance, Resale Power Group)
of Iowa, Wisconsin Industrial Energy Group,)
Multiple Intervenors (NY), Arkansas Electric)
Energy Consumers, Inc., Public Power)
Association of New Jersey, Oklahoma Industrial)
Energy Consumers, Large Energy Group of Iowa,)
Industrial Energy Consumers of Pennsylvania,)
Maryland Office of People's Counsel,)
Pennsylvania Office of Consumer Advocate,)
Consumer Advocate Division of the Public)
Service Commission of West Virginia, and)
Missouri Industrial Energy Consumers,)

Complainants)

v.)

Avista Corporation; Idaho Power Company)
MATL LLP; NorthWestern Corporation;)
PacifiCorp; Portland General Electric Company;)
Puget Sound Energy, Inc.; Duke Energy Florida,)
LLC; Florida Power & Light Company;)
Tampa Electric Company; Dominion Energy)
South Carolina, Inc.; Duke Energy Carolinas, LLC)
and Duke Energy Progress, Inc.; Louisville Gas and)
Electric Company and Kentucky Utilities)
Company; Southern Company Services Inc.,)
as agent for Alabama Power Company,)
Georgia Power Company, and Mississippi Power)
Company; Arizona Public Service Company;)
Black Hills Power, Inc.; Black Hills Colorado)
Electric Utility Company, LP; Cheyenne Light,)
Fuel & Power Company; El Paso Electric)
Company, NV Energy, Inc;)

Docket No. EL25-44-000

Public Service Company of Colorado; Public)
 Service Company of New Mexico; Tucson Electric)
 Power Company; UNS Electric, Inc.; California)
 Independent System Operator, Inc.; Southwest)
 Power Pool, Inc.; PJM Interconnection, L.L.C.;)
 Midcontinent Independent System Operator Inc.;)
 New York Independent System Operator, Inc.; and)
 Independent System Operator of New England Inc.,)
)
 Respondents)

**ANSWER OF THE ISO/RTO COUNCIL IN SUPPORT OF MOTION OF THE EDISON
 ELECTRIC INSTITUTE AND WIRES
 FOR EXTENSION OF TIME TO SUBMIT COMMENTS**

Pursuant to Rule 213 of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure,¹ the ISO/RTO Council (“IRC”)² submits this answer in support of the motion of the Edison Electric Institute (EEI) and WIRES for an extension of time to submit comments in response to the above-captioned complaint proceeding.³ EEI and WIRES request that the Commission extend the period for answers to, interventions in, comments on, and protests of the complaint by an additional 45 days from the date of February 3, 2025⁴, up to and including March 20, 2025. For the reasons set forth in their motion, the IRC supports the relief requested by EEI and WIRES. Granting an extension will enhance the record that is

¹ 18 C.F.R. § 385.213.

² The IRC comprises the following independent system operators (“ISOs”) and regional transmission organization (“RTOs”): Alberta Electric System Operator (“AESO”); California Independent System Operator Corporation (“CAISO”); Electric Reliability Council of Texas, Inc. (“ERCOT”); the Independent Electricity System Operator (“IESO”) of Ontario; ISO New England Inc. (“ISO-NE”); Midcontinent Independent System Operator, Inc. (“MISO”); New York Independent System Operator, Inc. (“NYISO”); PJM Interconnection, L.L.C. (“PJM”); and Southwest Power Pool, Inc. (“SPP”). AESO, ERCOT, and ISEO are not named respondents and do not join this answer.

³ Complaint of *Industrial Energy Consumers of America, et al. v. Avista Corporation, et al.*, Docket No. EL25-44-000 (filed Dec. 19, 2024).

⁴ See Combined Notice of Filings #1, Docket Nos. ER24-2889-001, *et al.* (filed Dec. 20, 2024).

available to the Commission when it rules on the Complaint, which constitutes good cause to grant this motion. *See* Complaint Procedures, Order No. 602-A, FERC Stats. & Regs. ¶ 31,076 at 30,856 (1999) (clarifying that the Commission will “be flexible” in considering extensions of the time to answer complaints and will “favor” extensions that foster the development of the record early in the complaint process); see also 18 C.F.R. § 385.2008 (authorizing extensions of time “for good cause”). The additional time will allow for a more thorough and complete answer for the Commission to consider in making its ruling.

The IRC respectfully requests that the Commission consider this answer in any action it takes on the motion.

Respectfully submitted,

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December 24, 2024

CERTIFICATE OF SERVICE

I certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 24th day of December, 2024.

/s/ Ariana Rebancos

Ariana Rebancos

An employee of the California ISO