

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Competitive Transmission Development
Technical Conference

Docket No. AD16-18-000

**JOINT MOTION OF TRADE ASSOCIATIONS
FOR EXTENSION OF TIME TO SUBMIT COMMENTS**

The American Public Power Association, Edison Electric Institute, Large Public Power Council, National Rural Electric Cooperative Association, and Transmission Access Policy Study Group (“the Utility Trade Associations”) jointly move for a 31-day extension of time to submit post-technical conference comments in this proceeding.

On June 27–28, 2016, the Commission held a technical conference addressing issues related to competitive transmission development processes as well as transmission planning and cost allocation. The five panels at the conference discussed the use of cost-containment provisions; the Commission’s consideration of transmission rates with cost-containment provisions and resulting from competitive transmission development processes; the relationship of competitive transmission development to transmission incentives; interregional transmission coordination, development, and cost allocation; and regional transmission planning and development.

By notice of August 3, 2016, the Commission invited interested parties to file post-technical conference comments on the questions listed in a five-page attachment to the notice. The Commission indicated these comments could reference material previously filed in this docket, including the technical conference transcript, but “encouraged” commenters “to submit new or additional information rather than reiterate

information that is already in the record” and “when possible, to provide examples in support of their answers.” The notice made comments due on or before September 2, 2016.

The Utility Trade Associations believe that the industry, other stakeholders, and the Commission would benefit from an extension of the comment date. The numerous and complex questions in the attachment to the notice raise important issues and with significant implications for the utility industry, as well as the electric energy sector as a whole, and will require more time for adequate consideration than the current deadline for comments affords. These questions encompass a wide-ranging set of issues involving not just competitive transmission development processes, but also the Commission’s transmission planning and cost allocation regulations and possible changes to the Commission’s transmission rate policies (including the Commission’s discounted cash flow analysis used in determining the allowed return on equity for transmission owners). These matters are important and will require the Utility Trade Associations to work closely with their respective members in the preparation of comments as encouraged in the notice. The August timeframe makes this especially difficult, given vacation schedules and the absence of many relevant personnel. Additional time will allow the Utility Trade Associations and other stakeholders who will be commenting on the questions raised in the notice, sufficient time to provide a more robust record on which the Commission may base future actions in this or related proceedings.

Accordingly, the Utility Trade Associations respectfully request a 31-day extension of time, until Monday, October 3, 2016, to submit post-technical conference comments.

Respectfully submitted,

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