

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Centralized Capacity Markets in Regional Transmission  
Organizations and Independent System Operators

Docket No. AD13-7-000

MOTION OF THE  
AMERICAN PUBLIC POWER ASSOCIATION,  
THE NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS,  
THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION,  
AND THE TRANSMISSION ACCESS POLICY STUDY GROUP  
FOR EXTENSION OF TIME TO SUBMIT  
POST-TECHNICAL CONFERENCE REPLY COMMENTS

Pursuant to Rule 212 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212 (2013), the American Public Power Association, the National Association of Regulatory Utility Commissioners, the National Rural Electric Cooperative Association, and the Transmission Access Policy Study Group (collectively "Joint Movants") request that the Commission grant a 30-day extension of time for parties to submit post-technical conference comments in the above-referenced proceeding. Joint Movants submit that a 30-day extension of time is warranted in order to afford parties a sufficient opportunity to develop comments in response to the questions posed in the Commission's Notice Allowing Post-Technical Conference Comments, issued October 25, 2013 ("October 25 Notice").

During the September 25, 2013 technical conference, participants raised and addressed a number of technical, legal and policy issues regarding centralized capacity markets in the Northeast region. These issues are complex and have generated both significant debate and several proceedings before the Commission. In order to appropriately consider the issues and provide the Commission with a more comprehensive recommendation and response to the questions posed in the October 25 Notice, Joint Movants believe that additional time is warranted beyond the December 9, 2013 comment date. Further, as national associations representing hundreds of members, Joint Movants must consult with their members in order to develop comments that will accurately reflect their interests. An extension of time

would afford Joint Movants an opportunity to conduct these necessary discussions with their members. Finally, Joint Movants submit that a 30-day extension should not cause any undue delay or burden.

WHEREFORE, for the foregoing reasons, Joint Movants request that the Commission grant a 30-day extension of time and direct that comments on the questions posed in the October 25 Notice may be filed by January 8, 2014.

Respectfully submitted,

/s/ Susan N. Kelly

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Dated: November 15, 2013

CERTIFICATE OF SERVICE

I hereby certify that on this 15<sup>th</sup> day of November, 2013, I have caused a copy of the foregoing to be served upon each person on the official Service List in this proceeding.

/s/ Adrienne E. Clair