

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

Electric Transmission Incentives Policy Under) Docket No. RM20-10-000
Section 219 of the Federal Power Act)

**ANSWER OF THE AMERICAN PUBLIC POWER ASSOCIATION AND
TRANSMISSION ACCESS POLICY STUDY GROUP TO
AMERICAN MANUFACTURERS’ MOTION FOR EXTENSION OF TIME**

In their April 29, 2020 Motion for Extension of Time, American Manufacturers ask the Federal Energy Regulatory Commission (“Commission”) to extend the July 1, 2020 comment deadline for the Commission’s notice of proposed rulemaking in the above-captioned proceeding,¹ citing the challenges associated with the COVID-19 national emergency.² The American Public Power Association (“APPA”)³ and Transmission Access Policy Study Group (“TAPS”)⁴ agree that the circumstances cited in American Manufacturers’ motion provide good cause to extend the comment deadline in this proceeding.

The Incentives NOPR proposes to fundamentally alter the Commission’s current regulations and policies for awarding transmission incentives under section 219 of the Federal Power Act (“FPA”). Among other significant changes, the Commission proposes to abandon the current “risks and challenges” framework for evaluating incentive requests,⁵ and introduce return

¹ *Electric Transmission Incentives Policy Under Section 219 of the Federal Power Act*, 170 FERC ¶ 61,204 (2020) (“Incentives NOPR”).

² American Manufacturers Motion for Extension of Time at 4-5. American Manufacturers ask the Commission to “establish a comment deadline that is the later of sixty days after the date on which the national state of emergency is lifted or October 1, 2020.” *Id.* at 5.

³ APPA is the national service organization representing the interests of not-for-profit, state, municipal, and other locally-owned electric utilities throughout the United States.

⁴ TAPS is an association of transmission-dependent utilities in 35 states, promoting open and non-discriminatory transmission access.

⁵ *See* Incentives NOPR at PP 34-40.

on equity adders for certain economic and reliability benefits.⁶ These and other proposals in the Incentives NOPR require thorough review and comment by industry stakeholders.

The ongoing COVID-19 national emergency, as American Manufacturers explain, will make it more difficult for interested parties to analyze the Incentives NOPR and develop comments by the current July 1, 2020 deadline.⁷ The coronavirus pandemic has disrupted the normal operations of APPA, TAPS, and their utility members, making it more challenging to obtain member input and develop comments on the Incentive NOPR's proposals. APPA and TAPS recognize that the Commission set the comment date for this NOPR after the national emergency was declared and after it issued a notice extending certain deadlines, but the challenges associated with the COVID-19 national emergency have evolved and become more apparent since then. Given the significance and potential cost impacts of the proposals included in the Incentives NOPR, and the challenges presented by the COVID-19 national emergency, APPA and TAPS agree that a substantial extension of the current July 1, 2020 comment deadline is justified.

Respectfully submitted,

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⁶ *Id.* at PP 42-75.

⁷ *See* American Manufacturers Motion for Extension of Time at 4-5.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Rockville, Maryland this 4th day of May, 2020.

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