

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

ISO New England Inc.	)	Docket Nos. ER13-193-000
	)	ER13-196-000
	)	(not consolidated)
	)	

**COMMENTS OF THE NEW ENGLAND STATES COMMITTEE ON ELECTRICITY  
IN SUPPORT OF MOTION FOR AN EXTENSION OF TIME**

Pursuant to Rule 213 of the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) Rules of Practice and Procedure, 18 C.F.R. § 385.213 (2012), the New England States Committee on Electricity (“NESCOE”), a participant in these proceedings, files these comments in support of the July 9, 2013 Joint Motion for Extension of Time filed by ISO New England Inc. (“ISO-NE”), the New England Power Pool Participants Committee, and the Participating Transmission Owner Administrative Committee (“PTO AC”) (collectively, the “Joint Movants”). The Joint Movants seek a 60-day extension of time, to November 15, 2013, for the further compliance filing required by the Commission in its May 17, 2013 Order on Compliance Filings (“May 17 Order”).<sup>1</sup>

NESCOE agrees with Joint Movants that a 60-day extension is necessary to meaningfully address the range of complex issues that are the subject of further compliance. As noted by Joint Movants, the May 17 Order requires clarifications and tariff revisions in a number of areas, including the competitive process for developing reliability projects and qualification criteria for transmission developers. The May 17 Order also rejected as non-compliant the proposed process for evaluating public policy-driven transmission projects and the associated cost allocation

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<sup>1</sup> *ISO New England Inc.*, 143 FERC ¶ 61,150 (2013).

method. The region's need to revisit these aspects of Order No. 1000, which were the source of robust and time-consuming discussion leading up to the compliance filing, alone necessitates an extension of time to provide a reasonable opportunity for state and stakeholder involvement and regional coordination.

A 60-day extension will provide additional time for NESCOE and the states, stakeholders, and others to engage with ISO-NE and PTO AC members in the development of tariff changes to comply with the May 17 Order and to attempt to resolve open issues prior to a subsequent compliance filing with the Commission. NESCOE further supports the Joint Movant's request that the Commission act expeditiously on the request for extension to afford notice of any new deadline for further compliance filing sufficiently in advance of the currently-effective September 16, 2013 deadline.

Respectfully submitted,

/s/ Jason R. Marshall

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Date: July 9, 2013

## CERTIFICATE OF SERVICE

In accordance with Rule 2010 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day served by electronic mail a copy of the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Boston, Massachusetts this 9th day of July, 2013.

Respectfully submitted,

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