

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

**Frequency Response Metrics to Assess Requirements
for Reliable Integration of Variable Renewable
Generation**

Docket No. AD11-8-000

**MOTION OF THE EDISON ELECTRIC INSTITUTE AND
THE ELECTRIC POWER SUPPLY ASSOCIATION
TO EXTEND THE PERIOD FOR FILING COMMENTS UNTIL MAY 6, 2011
AND
RESPONSE TO REQUEST FOR EXTENSION OF TIME OF THE AMERICAN
WIND ENERGY ASSOCIATION**

Pursuant to Rule 212 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure, 18 C.F. R. §§ 385.212, (2001), the Edison Electric Institute ("EEI") and the Electric Power Supply Association ("EPSA"), (collectively "the Associations") on behalf of their members, hereby submit this Motion to Extend the Period for Filing Comments in response to the Commission's Notice Inviting Comments on Report ("Notice") in this docket for an additional 60 days until May 6, 2011.¹ In the Notice issued on January 20, 2011, the Commission invited comments on a report prepared by the Lawrence Berkeley National Laboratory ("LBL"), "Use of Frequency Response Metrics to Assess the Planning and Operating Requirements for Reliable Integration of Variable Renewable Generation" and its five supporting papers (collectively "the Report")." The Associations make this request to ensure that the Associations and their members have sufficient time to evaluate the Report, undertake necessary analyses, to develop relevant information and to provide more fully developed

¹ While it does not join in this Motion, the National Rural Electric Cooperative Association ("NRECA") has authorized the Associations to indicate to the Commission that NRECA supports the granting of an additional 60 days for comments in this docket.

comments to assist the Commission in its evaluation of issues that may arise from the Report.

EEI is the association of the nation's shareholder-owned electric utilities and its affiliates world-wide. Its members include generators, transmission customers and owners and operators of transmission facilities subject to the Commission's jurisdiction. EEI members own and operate variable resources as well as transmission systems to which such resources are interconnected.

EPSA is the national trade association representing competitive power suppliers, including generators and marketers. These suppliers, who account for 40 percent of the installed generating capacity in the United States, provide reliable and competitively priced electricity from environmentally responsible facilities serving power markets. EPSA seeks to bring the benefits of competition to all power customers.

Communications and correspondence concerning this Motion should be directed to:

EDISON ELECTRIC INSTITUTE

Barbara A. Hindin
Associate General Counsel
Edison Electric Institute
701 Pennsylvania Ave., N.W.
Washington, D.C. 20004-2696
Tel: 202-508-5019
Fax: 202-508-5673
Email: bhindin@eei.org

ELECTRIC POWER SUPPLY ASSOCIATION

Nancy Bagot
Vice President of Regulatory Affairs
Electric Power Supply Association
1401 New York Avenue, NW

11th Floor
Washington, DC 20005
(202) 628-8200
nancyb@epsa.org

The American Wind Energy Association (“AWEA”) recently filed a request for an extension of time for an additional 14 days in this docket. While the Associations support AWEA’s initiative in seeking an extension, the Associations do not believe that an additional 14 days is sufficient to evaluate the complex technical issues in the Report and to prepare comments. Therefore, the Associations ask the Commission to grant their request for an additional 60 days, rather than the AWEA request.

The Associations believe that this request is best viewed in the context of the actions that have been taken by the Commission, NERC and the industry regarding the issue of frequency response. The Commission first took action on this issue regarding Reliability Standard BAL-003 in Order No. 693, raising various concerns and issuing a directive for NERC to modify the standard.² The Associations and other industry stakeholders did not request clarification or rehearing of the directive at the time for a broad range of reasons, including the desire to get the new Version 0 Reliability Standards in place.

On March 18, 2010, the Commission issued an order in RM06-16.³ Reflecting its frustration that the industry and NERC had not yet responded to the directive in Order No. 693, the Commission set a September, 2010 deadline for NERC to submit a modified standard to the Commission for approval. NERC filed a request for clarification, and in

² *Mandatory Reliability Standards for the Bulk Power System*, Order No. 693, FERC STATS. & Regs. ¶ 31,242, *order on reh’g*, Order No. 693-A, 120 FERC ¶ 61,053 (2007).

³ *Order Setting Deadline for Compliance*, 120 FERC ¶ 61, 218 (2010).

response, the Commission removed the deadline and set a technical conference.⁴ The nature of the issues and the NERC plan for moving ahead in response were laid out in detail at the conference.⁵ The technical conference underscored the complexity of the issues regarding frequency response, particularly the challenges for modeling with confidence in the Eastern Interconnection, as well as related data challenges.

While the LBL report appears to conclude that renewable integration should not pose a serious challenge to Bulk-Power System reliability, the report also raises a host of complex technical questions, and does not provide specific recommendations or immediate solutions, for addressing the concerns raised by the Commission regarding frequency response in Order No. 693.

EEI and other stakeholders have told the Commission on several occasions in other reliability dockets and forums that if everything is a priority, nothing is a priority. The 45-day comment period provided in the Notice seems to suggest that the Commission views this issue as a high priority. However, the Associations believe, in the context of the Commission's other actions on frequency response and the complexity of the issues involved, that an additional 60 days to review and study the Report and prepare thoughtful, comprehensive comments are appropriate. The Associations believe that their members will benefit greatly from the additional time requested and that the end result of granting this request will be more focused and better reasoned comments for the Commission to aid in its further consideration of the frequency response issues.

⁴ *Order Granting Rehearing for Further Consideration and Scheduling Technical Conference*, 131 FERC 61.136 (2010).

⁵ *Technical Conference on Frequency Response in the Wholesale electric Grid*, Docket No. RM06-16-10 (September 23, 2010).

WHEREFORE, for the foregoing reasons, The Associations respectfully request the Commission to grant this motion to provide for an extension of the date to file comments in this docket for an additional 60 days until May 6, 2011.

Respectfully submitted,

/s/

James P. Fama
Vice President, Energy Delivery
Edison Electric Institute
701 Pennsylvania Ave. NW
Washington, DC 20004
(202) 508-5000

Nancy Bagot
Vice President of Regulatory Affairs
Electric Power Supply Association
1401 New York Avenue, NW
11th Floor
Washington, DC 20005
(202) 628-8200

February 15, 2011

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 Washington, D.C. this 15th day of February, 2011.

/s/

Barbara Hindin
Edison Electric Institute
701 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2696
202-508-5019