

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

<b>Preventing Undue Discrimination and Preference in Transmission Service</b>	)	<b>Docket Nos. RM05-25-000 and RM05-17-000</b>
	)	
<b>Mid-Continent Area Power Pool</b>	)	<b>Docket No. OA07-51-000</b>
	)	

**MOTION OF MID-CONTINENT AREA POWER POOL FOR  
FURTHER EXTENSION OF TIME**

Pursuant to Rules 212 and 2008 of the Federal Energy Regulatory Commission’s (the “Commission”) Rules of Practice and Procedure, 18 C.F.R. § 385.212 and 385.2008 (2006), the Mid-Continent Area Power Pool (“MAPP”) hereby submits this Motion for Further Extension of Time in the above-captioned proceeding. The Commission has previously granted MAPP an extension of time until November 9, 2007,<sup>1</sup> to comply with the Order No. 890 requirements concerning the creation of a simultaneous submission window for processing transmission service requests.<sup>2</sup> By this Motion, MAPP seeks a further, limited extension of time to comply with its obligation to implement the simultaneous submission window. MAPP requests that the Commission grant it an additional extension of time of three weeks, until November 30, 2007.

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<sup>1</sup> See *Notice of Extension of Time*, Docket Nos. RM05-25-000, *et al.* (Aug. 13, 2007).

<sup>2</sup> *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, 72 Fed. Reg. 12266, FERC Stats. & Regs. ¶ 31,241 (2007).

## **I. BACKGROUND**

### **A. MAPP**

MAPP is a voluntary organization of utilities and other members serving customers in seven states and one Canadian province. MAPP's membership consists of investor-owned utilities, generation and transmission cooperatives, municipals, joint action agencies, public power districts, independent power producers, power marketers, a federal power marketing agency, and one Canadian Crown Corporation.

MAPP was initially established to operate as a regional reliability council and power pool to realize and further the reliability and other benefits of interconnected operations among a large number of entities engaged in the electric utility business in the MAPP region. MAPP now functions to provide a reserve sharing pool and a regional transmission group. The regional transmission group provides for the comparable and efficient provision of transmission service on a consistent basis, to realize and further the benefits of coordinated regional transmission planning, and to resolve disputes over the provision of transmission service. To facilitate these services, MAPP Schedule F is a discounted regional limited-services tariff that provides for regional coordination transmission service at non-pancaked rates in the MAPP region; it is an overlay of the MAPP Members' individual tariffs.

### **B. Order No. 890 Simultaneous Submission Window Requirements**

In Order No. 890, the Commission required transmission providers that establish “no earlier than” deadlines for reserving transmission service to propose a window within which all transmission service requests will be deemed to have been submitted simultaneously.<sup>3</sup> The

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<sup>3</sup> See *id.* at P 1419.

Commission explained that it would allow transmission providers to propose the period of time within which all requests would be deemed to have been submitted simultaneously, but that it expected the submittal window to be open for at least five minutes unless the transmission provider can present a compelling rationale to justify a shorter submission window.<sup>4</sup> The Commission also required transmission providers that establish a simultaneous submission window to propose a method for allocating transmission capacity if sufficient capacity is not available to meet all requests submitted within the proposed window.<sup>5</sup> MAPP's business practices contain "no earlier than" deadlines for the submission of transmission service requests and MAPP is therefore subject to the Commission's requirements regarding the creation of simultaneous submission windows and a corresponding capacity allocation method.

## **II. MOTION FOR EXTENSION OF TIME**

MAPP hereby respectfully moves for an extension of time of twenty-one (21) days from November 9, or until November 30, 2007, to comply with the Commission's requirements regarding the creation of a simultaneous submission window. As MAPP explained in its July 12, 2007 motion for extension of time, a number of complicating factors make the development of a simultaneous submission window for MAPP Schedule F service especially difficult. First, MAPP is a regional transmission group and its Schedule F is only an overlay of individual MAPP member transmission tariffs. The administration of ATC calculations and transmission request evaluation for Schedule F and the member transmission tariffs are highly coordinated and MAPP must therefore ensure that any simultaneous submission window it develops is fully consistent with, and complements, any services and business practices -- including simultaneous

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<sup>4</sup> *See id.* at P 1420.

<sup>5</sup> *See id.* at P 1422.

submission windows -- implemented under the individual MAPP member transmission tariffs or related business practices. Second, MAPP participates in multi-regional ATC coordination processes that include the Midwest ISO, PJM, SPP, and TVA. MAPP must ensure that the simultaneous submission window and capacity allocation process it develops are not inconsistent with the capacity allocation procedures in place pursuant to those processes. A third complicating factor is presented by the panoply of transmission services with varying durations that are offered under Schedule F, including daily firm, weekly firm, and monthly firm, all of which are sliding and extended service offerings. MAPP must ensure that any simultaneous submission windows it develops are internally consistent and technically feasible for all services it provides.

MAPP has developed a simultaneous submission window and is currently in the process of testing the associated software. However, MAPP cannot complete the testing by November 9, 2007. Nevertheless, full testing must be completed before the simultaneous submission window software is implemented because if it is not fully functional in all respects, the ability to grant transmission service requests under Schedule F will be compromised and ATC calculations will be adversely affected.

MAPP submits that, in light of the complicating factors it faces, the risks presented by implementing a dysfunctional simultaneous submission window, and the limited extension requested, good cause exists to grant this motion so that it may complete the testing on the software. Therefore, MAPP requests an extension of time of twenty one days, until and including November 30, 2007. MAPP is confident that with a twenty one day extension of time, it can complete the procedure and comply with the Commission's requirements.



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day caused the foregoing Motion to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 8th day of November, 2007.

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