

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

PacifiCorp	) ) )	Docket No. ER25-573-000
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**JOINT MOTION FOR EXTENSION OF TIME EXTENSION, SHORTENED ANSWER PERIOD,  
AND EXPEDITED ACTION**

Pursuant to Rules 212 and 2008(a) of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.2008(a) (2024) Arizona Public Service Co.; Bonneville Power Administration; City of Tacoma, Department of Public Utilities, Power Division; Powerex Corp.; Public Power Council; Public Utility District (“PUD”) No. 1 of Chelan County, Washington; PUD No. 1 of Cowlitz County, Washington; PUD No. 1 of Franklin County, Washington; PUD No. 2 of Grant County, Washington; PUD No. 1 of Klickitat County, Washington; PUD No. 1 of Lewis County, Washington; PUD No. 1 of Snohomish County, Washington; Puget Sound Energy; Salt River Project Agricultural Improvement and Power District; Shell Energy North America (US), L.P.; Tri-State Generation & Transmission Association, Inc.; and Tucson Electric Power Company (collectively, the “Joint Movants”)<sup>1</sup> hereby request that the Commission extend by one week to January 17, 2025 the deadline for submitting comments, protests, and motions to intervene regarding PacifiCorp’s November 22, 2024 proposed Open Access Transmission Tariff (“OATT”) revisions to facilitate its participation in the California Independent System Operator’s Inc.’s (“CAISO”) Extended Day-Ahead Market (“EDAM”) (“Filing”). Given the complex issues raised by the filing, as detailed further below, and the three major Federal holidays that fall within the comment period, Joint Movants respectfully request additional time to review and respond to the revisions PacifiCorp has proposed in its

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<sup>1</sup> The Joint Movants are individual intervenors in this proceeding or will submit individual motions to intervene contemporaneously with this motion.

Filing. The additional time will allow all parties to submit more complete filings that will improve the record in this proceeding and provide a better basis for reasoned decision making.

## **I. DESCRIPTION OF JOINT MOVANTS**

Joint Movants include a diverse group of seventeen entities that expect to be impacted by the significant consequences the PacifiCorp proposal would effect in the Western Interconnection. The Joint Movants provide an indication of the breadth of geography and the diversity of substantive interests that will be affected by the PacifiCorp proposal detailed in the Filing.

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

Pursuant to Rule 2008, the Commission may in its discretion extend “the time by which any person is required or allowed to act under any statute, rule or order . . . for good cause, upon a motion made before the expiration of the period prescribed or previously extended.”<sup>2</sup> The Commission’s issued notice of PacifiCorp’s November 25, 2024 filing in this proceeding accepted PacifiCorp’s requested comment deadline of January 10, 2025.<sup>3</sup> However, in light of the scope and significant impacts of PacifiCorp’s proposed changes to its tariff, which involve a new participation model, substantial issues of fact, policy and compliance with Commission orders, and a comment period spanning three major Federal holidays, Joint Movants request a modest extension of the comment period. Granting an extension will help ensure that a broad array of interested parties have the opportunity to evaluate PacifiCorp’s proposal and properly respond with information and materials that will aid the Commission’s review of these complex matters, by providing a more complete record for the Commission’s consideration.

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<sup>2</sup> 18 C.F.R. § 385.2008.

<sup>3</sup> *PacifiCorp*, Errata Notice Extending Comment Period, Docket No. ER25-573-000 (issued Nov. 27, 2024) (“Errata Notice”).

The Commission may grant a motion for an extension of time for good cause, where, as here, a motion is made prior to the expiration of the comment period.<sup>4</sup> In keeping with Commission precedent, good cause exists for the Commission to grant an extension in this proceeding.<sup>5</sup>

First, the PacifiCorp proposal appears to impose a significant, complex, and broad array of consequences on multiple entities in the Western Interconnection, including potential planning, operational, and long-term financial impacts. The OATT revisions that PacifiCorp proposes in its Filing are the first to be made in the context of EDAM implementation, and a core subset of those revisions represent a major change to the established and Commission-approved OATT structure for providing firm point-to-point and network transmission service that has been in place, and relied upon across the Western Interconnection, for over two decades. PacifiCorp's proposal, and the potential that additional transmission providers joining EDAM may adopt some or all of the elements of PacifiCorp's proposal, if approved, can be expected to affect billions of dollars of current, planned, and future investments in transmission service, including service that funds important transmission expansions and upgrades across the western region.

Second, though PacifiCorp conducted a stakeholder process that preceded its filing, some of the most significant issues—including the treatment of long-term firm point-to-point and network transmission service—did not receive attention until near the conclusion of the stakeholder process, and even then, in a limited fashion. These timing constraints foreclosed the level of

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<sup>4</sup> See 18 C.F.R § 385.2008(a) (2024) (allowing a comment period to be extended for “good cause” and upon motion made “before the expiration of the period prescribed”). To determine if good cause exists for granting a request for an extension of time, the Commission will review the facts surrounding the request. See *Salt Lake County Water Conservancy Dist.*, 31 FERC ¶ 61,201, at p. 61,413 (1985).

<sup>5</sup> See, e.g., *Pub. Serv. Co. of Colo.*, Notice of Extension of Time, Docket No. ER19-675-000 (Jan. 8, 2019) (granting a motion filed before expiration of the comment period, which requested a one-week extension of time to file comments); *Cal. Indep. Sys. Operator Corp.*, Notice of Extension of Time, Docket Nos. ER06-615-011, *et al.* (Aug. 22, 2007) (granting a motion filed before expiration of the comment period, which requested a two-week extension of time to file comments); *Duke Energy Corporation, et al.*, Notice of Extension of Time, Docket No. EL01-101-000 (Aug. 8, 2001) (granting a motion filed before expiration of comment period for a 30-day extension to respond to a petition seeking a declaratory order).

meaningful dialogue that might have permitted interested parties to analyze impacts, provide feedback, and seek solutions to the key issues that remain unaddressed in the Filing.

Third, the public interest in a reliable western grid—at a time when well-documented resource and load changes across the region have created substantial resource, transmission, and reliability challenges—supports the requested extension, to ensure a robust administrative record. Commission action without the benefit of a fully developed record that reflects broad public review and participation in this proceeding would not only create the risk of arbitrary and capricious determinations but may result in catastrophic consequences for both suppliers and consumers across the region, all of whom rightly demand and expect the availability of reliable long-term transmission service.

Fourth, PacifiCorp's Filing is complex and lengthy. The Filing runs more than 1,000 pages, includes testimony from three individuals, and proposes complicated revisions across much of PacifiCorp's OATT.

Finally, the current comment period—running from November 26, 2024 to January 10, 2025—covers three major Federal holidays, during which time many of the staff, consultants, potential witnesses, and key decision-makers that Joint Movants expect to rely upon will have limited availability. The proposed one-week extension of the comment period is intended to roughly accommodate these holiday interruptions. The Joint Movants recognize and appreciate PacifiCorp proposing a comment deadline of January 10, 2025, which the Commission has accepted.<sup>6</sup> However, for the above reasons, the Joint Movants seek and require additional time to examine and analyze how the proposed revisions will impact their businesses in order to develop appropriate comments (and, if necessary, testimony) in response to the Filing.

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<sup>6</sup> See Errata Notice at 1.

For these reasons, the Joint Movants request a modest one-week extension to the comment period, which would close on January 17, 2025.

### **III. MOTION FOR SHORTENED ANSWER PERIOD AND EXPEDITED ACTION**

Joint Movants respectfully request that the Commission shorten the time for responses to this motion from five to three days, which would make answers to this motion due on December 10, 2024. Additionally, the Joint Movants respectfully request that the Commission act on this motion for extension expeditiously and issue an order on or before December 17, 2024. A shortened answer period and expedited Commission action are necessary in order to provide the stakeholders with sufficient notice of an extension, if granted, which would facilitate the preparation of their protests and comments.

### **IV. CONCLUSION**

Joint Movants, for good cause shown, respectfully request that the Commission extend the period for responding to PacifiCorp's Filing by one week, from January 10, 2025 to January 17, 2025, shorten the answer time for responses to this motion to December 10, 2024, and act on this motion by December 17, 2024. The instant motion for an extension is consistent with requests granted by the Commission in similar circumstances.<sup>7</sup>

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<sup>7</sup> See, e.g., *ISO New England Inc.*, Notice Extending Comment Period, Docket No. ER22-983-000 (Feb. 18, 2022) (granting motion for a 37-day extension from an original comment date to permit interested parties who sought additional time to examine the tariff revisions the interested parties described as significant and substantial); *Midcontinent Independent System Operator, Inc.*, Notice of Extension of Time, Docket No. ER24-1638-000 (May 2, 2024) (granting motion for 16-day extension of time to respond to proposed direct loss of load accreditation methodology); *Midcontinent Independent System Operator, Inc.*, Notice of Extension of Time, Docket No. ER23-2977-000 (Oct. 25, 2023) (granting motion for 7-day extension of time to respond to proposed reliability-based demand curve); *PJM Interconnection, L.L.C.*, Notice of Extension of Time, Docket Nos. ER24-98-000, *et al.* (Oct. 27, 2023) (granting motion for 6-day extension of time to respond to proposed enhancements to PJM Interconnection, L.L.C.'s ("PJM") Capacity Market Rules, over the objections of PJM.)

Respectfully submitted,

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Dated: December 5, 2024

*On behalf of Tucson Electric Power  
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## CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010, 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 the proceeding.

Dated at Washington, D.C. this 5th day of December, 2024.

/s/ Alexandra Zak  
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Bracewell LLP