

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

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**Midwest Independent Transmission )  
System Operator, Inc. )**

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**Docket No: ER11-4081-001**

**MOTION OF THE ORGANIZATION OF MISO STATES  
FOR EXTENSION OF BRIEFING SCHEDULE**

**I. BACKGROUND**

On August 12, 2013, the Commission issued an “Order Initiating Briefing Procedures (“August 12 Order”)” in this docket.<sup>1</sup> Ordering Paragraph B of the August 12 Order invites parties to submit “additional information with respect to the Commission’s rejection of MISO’s proposed minimum offer price rule.” Initial briefs are due within 30 days, or September 11, 2013. Reply briefs are due within 21 days thereafter, or October 2, 2013.

As explained below, the Organization of MISO States (“OMS”) requests the Commission to extend the briefing schedule to provide 60 days for initial briefs and 45 days for reply briefs. The modified schedule would this have initial briefs filed by October 11, 2013, and reply briefs filed by November 25, 2013.

**II. SUPPORT FOR EXTENSION OF BRIEFING SCHEDULE**

While the August 12 Order is cast in the terminology of a legal briefing procedure, its references to evidence presented by the Market Monitor and Capacity Suppliers, along with the phrasing of Ordering Paragraph B, make it clear that the Commission contemplates evidentiary

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<sup>1</sup> 144 FERC ¶ 61,125.

kinds of submissions and analytic responses to the submissions of other parties. The proposed schedule does not allow sufficient time for the kind of factual presentations and technical analysis called for by the Commission's August 12 Order.

Additionally, the Commission should be aware that responses on Interregional Order 1000 filings are due September 9, 2013, just two days before the initial briefing date set in the August 12 Order. In the MISO region, the staff of OMS member states are fully engaged in preparing responses to three Interregional filings.<sup>2</sup> This workload stretches the limited resources of State Commission staff available for work on MISO issues. That is also true for other parties to this docket with limited resources.

The Commission should also be aware of another work conflict for OMS and many load-serving entities in this region. For several weeks, the OMS has been coordinating with MISO to develop and conduct a survey of generation and load-serving resources. That survey was sent out early this week and responses were requested by September 13, 2013. The purpose of the survey is to support the state jurisdictional role in generation planning and Integrated Resource Planning, as well as increasing forward transparency in a confidential manner on a system-wide basis, providing a more accurate look two to ten years out in anticipation of resource changes for environmental and economic reasons. The survey deals with resource issues that may involve the same staff resources needed to respond to the Commission's briefing procedure.

The undersigned has been authorized to state that the following parties concur in this request for extension of the briefing schedule:

American Public Power Association  
Midwest TDUs<sup>3</sup>

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<sup>2</sup> Docket No. ER13-1923 (MISO-SERTP), Docket No. ER13-1938 (MISO-SPP), and Docket No. ER13-1943 (MISO-PJM).

<sup>3</sup> For purposes of this docket, "Midwest TDUs" consists of Great Lakes Utilities ("GLU"), Indiana Municipal Power Agency ("IMPA"), Madison Gas & Electric Company ("MGE"), Midwest Municipal Transmission Group

DTE Electric Company  
Indianapolis Power & Light Company  
Xcel Energy

### III. CONCLUSION

For the reasons explained above, the OMS requests that the Commission establish a revised briefing schedule in this docket.

Respectfully Submitted,  
William H. Smith, Jr.  
William H. Smith, Jr.  
Executive Director  
Organization of MISO States  
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Tel: 515-243-0742

Dated: August 23, 2013

### 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 Des Moines, Iowa, this 23rd day of August, 2013.

William H. Smith, Jr.  
William H. Smith, Jr.

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(“MMTG”), Missouri Joint Municipal Electric Utility Commission (“MJMEUC”), Missouri River Energy Services (“MRES”), Southern Minnesota Municipal Power Agency (“SMMPA”), and WPPI Energy (“WPPI”)