

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

ITC Grid Development, LLC)))	Docket No. EL15-86-000
---------------------------	-------------	------------------------

NOTICE OF INTERVENTION AND MOTION FOR EXTENSION OF TIME TO SUBMIT
COMMENTS OF THE ORGANIZATION OF MISO STATES

I. Background

On July 28, 2015, ITC Grid Development, LLC filed a Petition for Declaratory Order (Petition) seeking a Commission ruling that (1) a binding revenue requirement bid selected through an approved Order 1000 compliant and competitive process will be deemed just and reasonable under Section 205 of the Federal Power Act; and (2) that said bid would receive protection under the *Mobile-Sierra* doctrine.

II. Notice of Intervention

Pursuant to Rule 214(a)(2) of the Federal Energy Regulatory Commission Rules of Practice and Procedure, 18 C.F.R. § 385.214(a)(2), the Organization of MISO States (OMS) files its Notice of Intervention in this proceeding. The OMS is a non-profit, self-governing organization of representatives from each regulatory body with jurisdiction over entities participating in the Midcontinent ISO (MISO) and serves as the regional state committee in the region. The purpose of the OMS is to coordinate regulatory oversight among its members, to make recommendations to the MISO, the MISO Board of Directors, the Commission, and other relevant government entities and state commission as appropriate, and to intervene in proceedings before the Commission to express the positions of the OMS member agencies.

Service of pleadings, documents, and communications should be made on the following:

Tanya Paslawski
Executive Director
Organization of MISO States
100 Court Avenue, Suite 315
Des Moines, IA 50309

III. Motion for Extension of Time to Submit Comments

Pursuant to Rule 212 of the Federal Energy Regulatory Commission Rules of Practice in Procedure, 18 C.F.R. § 385.212, the OMS files this Motion for Extension of Time to Submit Comments. The OMS is seeking two additional weeks to submit comments in order to compile the positions of its diverse members on the important issues raised in the Petition. As such, OMS requests an extension of the date to submit comments to September 10, 2015.

Respectfully submitted,

Tanya Paslawski

Tanya Paslawski
Executive Director
Organization of MISO States
100 Court Avenue, Suite 315
Des Moines, Iowa 50309
(515) 243-0742
tanya@misostates.org

Dated: August 27, 2015

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 St. Paul, Minnesota this 27th day of August, 2015.

Tanya Paslawski