



or otherwise condition the sale of Wholesale EERs or other energy technologies into the wholesale electricity markets, the Commission will consider whether:

- a. the RERRA is acting within its legal authority and has a compelling interest for barring, restricting, or otherwise conditioning the technology's participation in the markets; and
- b. providing the RERRA such authority would satisfy the Commission's obligations under the FPA to ensure that the rates, terms, and conditions of wholesale markets are just and unreasonable and not unduly discriminatory or preferential.<sup>1</sup>

The Commission established July 5, 2017, as the comment date for interventions or protests in the Notice of Petition for Declaratory Order posted on June 5, 2017.<sup>2</sup>

## **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 Independent System Operator, Inc. (MISO) and serves as the regional state committee. The purpose of the OMS is to coordinate regulatory oversight among its members, to make recommendations to MISO, the MISO Board of Directors, the Commission, and other relevant government entities and state commissions as appropriate, and to intervene in proceedings before the Commission to express the positions of the OMS member agencies.

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<sup>1</sup> *Advanced Energy Economy*, Request for Declaratory Order, EL17-75-000, pgs. 9-12 (June 5, 2017).

<sup>2</sup> *Advanced Energy Economy*, Notice of Petition for Declaratory Order, EL17-75-000 (June 5, 2017).

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

Tanya Paslawski  
Executive Director  
Organization of MISO States  
100 Court Avenue, Suite 315  
Des Moines, IA 50309  
tanya@misostates.org

### **III. Motion for Extension of Time to Respond**

Pursuant to Rule 212 of the Federal Energy Regulatory Commission Rules of Practice and Procedure, 18 C.F.R. § 385.212, the OMS files this Motion for Extension of Time to Respond. The OMS is seeking two additional weeks to submit comments to best address the extensive issues raised in the Petition. The OMS believes the Commission will benefit from thorough input from state and local regulators that will be directly impacted by the declarations requested. Moreover, the additional time will allow the OMS Board of Directors to take up these important matters at its next meeting on July 17, 2017. As such, OMS requests an extension of the date to submit comments to July 19, 2017.

Respectfully submitted,

*Tanya Paslawski*

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Dated: June 29, 2017

**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 this 29th day of June, 2017.

*Tanya Paslawski*