

balanced portfolio cost-benefit analysis will be net of any reimbursements resulting from such third-party impacts; (2) ensure that system design software results needed for stakeholders to verify the application of the assumptions in creating the adjusted production cost-benefit metrics will be made available subject to the signing of confidentiality agreements or other needed arrangements to protect sensitive information; and (3) provide that resource-specific data in SPP's planning process be disclosed by SPP, under applicable confidentiality provisions, if the information is needed to participate in the transmission planning process and/or to replicate transmission planning studies.

II. MOTION FOR EXTENSION OF TIME

SPP has reviewed the June 18 Order and determined that, consistent with its practice in these circumstances, it is appropriate for the required SPP Tariff revisions and modifications to be developed through SPP's stakeholder process and approved by the SPP Board of Directors prior to filing. Specifically, the Commission's directives to make available system design software results and resource-specific data involves complex confidentiality issues, and requires the input of stakeholder groups before tariff language can be drafted and presented to the SPP Board of Directors for approval. The next Board of Directors meeting is scheduled on July 28, 2009. The SPP stakeholder groups, however, will not be able to develop and thoroughly vet the necessary tariff language prior to that meeting. The following Board of Directors meeting is scheduled October 28, 2009, in conjunction with the annual meeting of SPP's membership. SPP seeks leave to submit its compliance filing following the October meeting.

Good cause exists to grant an extension. Allowing SPP to file the revisions required by the June 18 Order after its October 2009 Board of Directors meeting will

enable SPP stakeholders to give adequate consideration to the required modifications to the SPP planning process and develop suitable tariff revisions to implement the Commission's directives.⁴ To ensure that SPP remains responsive to the needs of its members and customers, stakeholder involvement in refining the SPP planning process to comply with Commission policy and orders is important. While the stakeholders may be able to develop a proposed compliance filing relatively quickly, an extension to November 2 for the compliance filing will ensure that the proposed SPP Tariff revisions receive proper consideration by the relevant stakeholder groups before review by the Board of Directors, which meets only on a quarterly basis.⁵ The Commission recently granted a similar request for additional time by SPP, and has previously granted other extensions to compliance filing deadlines, to permit SPP to adopt SPP Tariff revisions through its stakeholder process.⁶ Accordingly, SPP requests an extension of time to

⁴ Concurrent with the filing of this Motion for Extension of Time, SPP is also submitting a request for rehearing of the June 18 Order concerning the Commission's directive to make available system design software results and resource-specific data subject to confidentiality provisions. If the Commission were to rule on SPP's rehearing request prior to November 2, 2009, it would provide additional guidance to SPP's stakeholders in their efforts to refine SPP's planning process in order to comply with the June 18 Order.

⁵ Rushing the stakeholder process in order to place a compliance filing on the July 28 Board of Directors meeting agenda could impair the ability of the stakeholder groups to give meaningful consideration to the proposed changes, while convening a special meeting of the Board of Directors for the limited purpose of approving the compliance filing after the stakeholders have acted would result in added burden to SPP's and its stakeholders' resources.

⁶ *See Sw. Power Pool, Inc.*, Notice of Extension of Time, Docket No. OA08-61-001 (Jul. 7, 2009) (granting SPP an extension until November 2, 2009 to submit a compliance filing to permit SPP adequate time to develop revisions to its Open Access Transmission Tariff through its stakeholder process); *see also Sw. Power Pool, Inc.*, Notice of Extension of Time, Docket No. OA08-61-000 (Sept. 12, (continued . . .)

submit its compliance filing on or before November 2, 2009, to provide SPP and its stakeholders adequate time to modify the planning process to address the Commission's directives.

III. CONCLUSION

For the foregoing reasons, SPP respectfully requests that the Commission grant it an extension to and including November 2, 2009, to submit the compliance filing required by the June 18 Order.

Respectfully submitted,

Matthew K. Segers
Barry S. Spector
Carrie L. Bumgarner
Matthew K. Segers
WRIGHT & TALISMAN, P.C.
1200 G Street, N.W., Suite 600
Washington, D.C. 20005-3802
Telephone: (202) 393-1200
Fax: (202) 393-1240
spector@wrightlaw.com
bumgarner@wrightlaw.com
segers@wrightlaw.com

**Attorneys for
Southwest Power Pool, Inc.**

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2008) (granting SPP a six-month extension to submit a compliance filing to permit SPP adequate time to develop revisions to its Open Access Transmission Tariff through its stakeholder process); *Sw. Power Pool, Inc.*, Notice of Extension of Time, Docket No. ER09-758-000 (May 15, 2009) (granting SPP an extension of a compliance filing deadline to permit SPP to comply with the stakeholder notice requirements of its Bylaws and Membership Agreement); *Sw. Power Pool, Inc.*, Notice of Extension of Time, Docket Nos. RT04-1-005, *et al.* (Mar. 21, 2005) (same).

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 Washington, D.C., this 17th day of July, 2009.

Matthew K. Segers

Matthew K. Segers

**Attorney for
Southwest Power Pool, Inc.**