

provisions of Attachment O of the SPP Tariff⁴ to remove overbroad restrictions on access to resource-specific data and to 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 December 16 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, if necessary, 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 January 31, 2012. 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 for April 24, 2012. SPP seeks leave to submit its compliance filing following the April meeting.

Good cause exists to grant an extension. Allowing SPP to file the revisions required by the December 16 Order after its April 2012 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. 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 is

⁴ Section VII now contains the Information Exchange provisions of Attachment O of the SPP Tariff.

important. While the stakeholders may be able to develop a proposed compliance filing relatively quickly, and extension to May 14 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 if necessary.⁵ The Commission has previously granted similar extensions to compliance filing deadlines, to permit SPP to adopt SPP Tariff revisions through its stakeholder process.⁶ Accordingly, while SPP is diligently working to comply with the directives of the December 16 Order, SPP requests an extension of time to submit its compliance filing on or before May 14, 2012, to provide SPP and its stakeholders adequate time to modify the planning process to address the Commission's directives.

⁵ The SPP Board of Directors meets only on a quarterly basis, and rushing the stakeholder process in order to place a compliance filing on the January 31, 2012 Board of Directors meeting agenda could impair the ability of stakeholder groups to give meaningful consideration to the proposed changes. Moreover, 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 Nos. ER08-1419-001 and ER08-1419-002 (July 22, 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. OA08-61-001 (July 7, 2009) (same); *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 No. OA08-61-000 (Sept. 12, 2008) (granting SPP a 120-day extension to submit a compliance filing to permit SPP adequate time to develop revisions to its Open Access Transmission Tariff through its stakeholder process).

III. CONCLUSION

For the foregoing reasons, SPP respectfully requests that the Commission grant it an extension to and including May 14, 2012, to submit the compliance filing required by the December 16 Order.

Respectfully submitted,
/s/ Susan E. Polk
Susan E. Polk
Southwest Power Pool, Inc.
415 North McKinley, #140 Plaza West
Little Rock, AR 72205
Telephone: (501) 614-3260
spolk@spp.org

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated on this 24th day of January, 2012.

/s/ Susan E. Polk

Susan E. Polk

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