

September 19, 2014

VIA ELECTRONIC FILING

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: *Southwest Power Pool, Inc.*, Docket No. ER14-2399-____
Motion for Deferral of Commission Action

Dear Secretary Bose:

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.212, Southwest Power Pool, Inc. (“SPP”) respectfully submits this motion for deferral of Commission action in this proceeding in order to develop further Tariff revisions through the SPP stakeholder process. On July 10, 2014,¹ as amended on August 27, 2014,² in Docket No. ER14-2399-000, *et seq.*, SPP submitted revisions to Attachment AE of its Open Access Transmission Tariff (“Tariff”).³ Attachment AE contains bidding, offering, and dispatching responsibilities of the Transmission Provider and Market Participants relating to the Integrated Marketplace and sets forth the operation, pricing and

¹ Submission of Tariff Revisions to Attachment AE for the Integrated Marketplace of Southwest Power Pool, Inc., Docket No. ER14-2399-000 (July 10, 2014) (“July 10 Filing”).

² Amendment to Tariff Filing of Southwest Power Pool, Inc., Docket No. ER14-2399-001 (Aug. 27, 2014) (“August 27 Filing”).

³ Southwest Power Pool, Inc., FERC Electric Tariff, Sixth Revised Volume No. 1.

settlement of the Day-Ahead Market, Real-Time Balancing Market and the Transmission Congestion Rights Market.

The July 10 Filing proposed to refine aspects of the Integrated Marketplace that require further description or clarification. The Tariff revisions proposed in these areas include enhancements to existing design features and addition of enhancements to broaden access to the Integrated Marketplace. The August 27 Filing amended the July 10 Filing to correct a formatting issue to Section 6.4.1.1 of Attachment AE submitted through eTariff, and to provide supplemental information for the Commission's consideration. In this instant filing, SPP requests deferral of Commission action on the July 10/August 27 Filings so that SPP may develop additional Tariff revisions that are appropriate for filing in this docket. SPP is seeking a delay of Commission action of the July 10/August 27 Filings and intends for the original proposed effective date of September 8, 2014 to be retained.⁴ SPP intends to prepare such additional Tariff revisions through SPP's stakeholder process. Granting SPP's request to defer action in this case would be consistent with the

⁴ Because SPP is not submitting any amended tariff sections with this motion for deferral of Commission action, there is no requested "effective date" for this filing. Therefore, SPP is specifying 12/31/9998 in the eTariff metadata for this filing, in accordance with FERC's Implementation Guide for Electronic Filing of Parts 35, 154, 284, 300 and 341 Tariff filings. Since a Tariff record is required, SPP is submitting a single, un-modified Tariff record from the previous filings in this docket.

Commission's policy to support participation by stakeholders in the decision-making process of regional transmission organizations.⁵

The Commission should grant SPP's requested deferral of Commission action because such deferral is being requested: (i) to develop additional Tariff language that SPP intends to submit in this proceeding; and (ii) to provide SPP the time and opportunity to develop such Tariff language through the SPP stakeholder process, consistent with Commission policy.

Respectfully submitted,

/s/ Matthew Harward

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⁵ *Policy Statement Regarding Regional Transmission Groups*, 1991-1996 FERC Stats. & Regs., Regs. Preambles ¶ 30,976, at 30,872 (1993) (the Commission will afford the appropriate degree of deference to the stakeholder approval process). The Commission's deference to RTO stakeholder processes has been upheld by the courts. *See* Pub. Serv. Comm'n of Wis. v. FERC, 545 F.3d 1058, 1062-63 (D.C. Cir. 2008) (noting that the Commission often gives weight to RTO proposals that reflect the position of the majority of the RTO's stakeholders) (quoting *Am. Elec. Power Serv. Corp. v. Midwest Indep. Transmission Sys. Operator, Inc.*, 122 FERC ¶ 61,083, at P 172 (2008)). *See also* *Midwest Indep. Transmission Sys. Operator, Inc.*, 109 FERC ¶ 61,285, at P 356 (2004) (encouraging market participants to contribute to the Midwest ISO "stakeholder process and to vet their proposals through that forum to gauge overall stakeholder benefits before submitting proposals to the Commission").

CERTIFICATE OF SERVICE

I hereby 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 Little Rock, Arkansas, this 19th day of September, 2014.

/s/ Michelle Harris

Michelle Harris