JOINT MOTION FOR AN EXTENSION OF TIME
OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION AND NORTHEAST
POWER COORDINATING COUNCIL, INC.

Pursuant to Rules 212 and 2008 of the Federal Energy Regulatory Commission’s ("FERC" or the "Commission") Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.2008 (2008), the North American Electric Reliability Corporation ("NERC") and Northeast Power Coordinating Council, Inc. ("NPCC") hereby submit a Joint Motion for an Extension of Time from January 21, 2009 to February 20, 2009 to allow NERC and NPCC to submit a compliance filing in response to the Commission’s December 18, 2008 Order in the above-captioned proceeding.\(^1\) The Commission’s December 18 Order, among other things, directs the submission of a comprehensive list of bulk electric system facilities within the United States portion of the NPCC region and seeks additional information so that the Commission can understand the scope and comprehensiveness of the definition of bulk electric system used in the NPCC Region, as well as internal consistency across the United States portion of the NPCC Region.\(^2\) The Commission directed NERC and NPCC to submit the required data within thirty

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\(^2\) See, e.g., id. at PP 1 and 12-13.
days of the date of the order. Due to the intervening federal holidays, the filing is due on January 21, 2008.

On December 19 and 23, 2008, NPCC issued a data request to all users, owners and operators in its Region requesting the information sought in the December 18 Order. This information was requested to be sent to NPCC by January 9, 2009. NERC, NPCC and representatives from the New York State Reliability Council, ISO-New England, New York Independent System Operator, Inc. and numerous Transmission Owners met in person on January 12, 2009. NERC and NPCC have held telephone conferences also to discuss the requirements set forth in the December 18 Order.

Despite the diligent efforts to date and the parties’ continuing work on responses to the December 18 Order, additional time is required to allow the parties to fully address the issues. Accordingly, NERC and NPCC respectfully request an extension of time to and including February 20, 2009 for the filing of the compliance filing.

WHEREFORE, in consideration of the foregoing, NERC and NPCC respectfully request that the Commission grant an extension of time to and including February 20, 2009, for the submittal of a compliance filing in response to the Commission’s December 18 Order.
Respectfully submitted,

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January 14, 2009
CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 14th day of January, 2009.

/s/ Rebecca J. Michael
Rebecca J. Michael

Attorney for North American Electric Reliability Corporation