

UNITED STATES OF AMERICA
before the
FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation	Docket No. RR06-1-004
Delegation Agreement Between the North American Electric Reliability Corporation and Texas Regional Entity, a division of ERCOT	Docket No. RR07-1-000
Delegation Agreement Between the North American Electric Reliability Corporation and Midwest Reliability Organization	Docket No. RR07-2-000
Delegation Agreement Between the North American Electric Reliability Corporation and Northeast Power Coordinating Council	Docket No. RR07-3-000
Delegation Agreement Between the North American Electric Reliability Corporation and Reliability <i>First</i> Corporation	Docket No. RR07-4-000
Delegation Agreement Between the North American Electric Reliability Corporation and SERC Reliability Corporation	Docket No. RR07-5-000
Delegation Agreement Between the North American Electric Reliability Corporation and Southwest Power Pool, Inc.	Docket No. RR07-6-000
Delegation Agreement Between the North American Electric Reliability Corporation and Western Electricity Coordinating Council	Docket No. RR07-7-000
Delegation Agreement Between the North American Electric Reliability Corporation and Florida Reliability Coordinating Council.	Docket No. RR07-8-000
North American Electric Reliability Corporation	Docket No. RR06-3-000

**REQUEST OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
FOR 14-DAY EXTENSION OF TIME TO FILE COMPLIANCE FILING
IN RESPONSE TO APRIL 19, 2007 ORDER**

October 5, 2007

The North American Electric Reliability Corporation (“NERC”) respectfully requests a 14-day extension of time, from October 16, 2007 to October 30, 2007, to file its compliance filing in response to the Commission’s Order issued April 19, 2007 in the above-captioned dockets¹ (“April 19 Order”). The requested extension of time will allow the NERC Board of Trustees sufficient time to thoroughly consider the compliance filing and the numerous documents that will be submitted with it, and to approve the filing at the Board’s regularly-scheduled meeting on October 23, 2007. In support of its request, NERC states as follows:

1. In the April 19 Order, the Commission approved the NERC *pro forma* delegation agreement, the individual delegation agreements between NERC and the eight Regional Entities, and the NERC Uniform Compliance Monitoring and Enforcement Program Document (“CMEP”), which is Appendix 4C to the NERC Rules of Procedure (“ROP”), including Attachment 2, Hearing Procedures, to the CMEP. However, the Commission also directed NERC and the Regional Entities to make numerous revisions to, and respond to numerous questions concerning, the *pro forma* delegation agreement, the individual delegation agreements, the CMEP and Hearing Procedures, and various sections of the NERC ROP. NERC was directed to make a compliance filing addressing these directives and questions within 180 days following the April 19 Order, *i.e.*, by October 16, 2007.

2. NERC’s compliance filing to the April 19 Order will include (among other things)

¹North American Electric Reliability Council and North American Electric Reliability Corporation, Docket No. RR06-1-004; Delegation Agreements Between the North American Electric Reliability Corporation and Texas Regional Entity, a division of ERCOT, Midwest Reliability Organization, Northeast Power Coordinating Council: Cross Border Regional Entity, Inc., ReliabilityFirst Corporation, SERC Reliability Corporation, Southwest Power Pool, Inc., Western Electricity Coordinating Council, and Florida Reliability Coordinating Council, Docket Nos. RR07-1-001, RR07-1-002, RR07-1-003, RR07-1-004, RR07-1-005, RR07-1-006, RR07-1-007, and RR07-1-008, respectively; and North American Electric Reliability Corporation, Docket No. RR06-3-000, 119 FERC ¶61,060 (2007)

a lengthy narrative discussion of how NERC and the Regional Entities have addressed the directives in the April 19 Order; an amended and restated *pro forma* delegation agreement; amended and restated delegation agreements between NERC and each of the eight Regional Entities; a revised CMEP including revised Attachment 2, Hearing Procedures; proposed revisions to several sections of the NERC ROP; and the bylaws and standards development procedures of each of the eight Regional Entities.²

3. Before the compliance filing can be made, it is necessary that the NERC Board of Trustees review and approve the compliance filing and the documents to be submitted with it including those referred to in paragraph 2 above. In light of the substantial amount of material and documents to be submitted in the compliance filing (many of which go to the core of NERC's and the Regional Entities' statutory functions), it is necessary and appropriate that the Board have adequate time to review the proposed compliance filing and the opportunity to discuss and approve the proposed compliance filing, including the documents being submitted with it, at a regularly-scheduled meeting of the Board.

4. The next regularly-scheduled meeting of the NERC Board of Trustees will be held on October 23, 2007.³ Accordingly, NERC is requesting a 14-day extension of the compliance filing due date, from October 14 to October 30, to enable the NERC Board to review the proposed compliance filing and to discuss and approve it at its October 23 meeting.

²In the April 19 Order the Commission pointed out that the Regional Entities' bylaws and standards development procedures are "ERO rules" and, under the Commission's regulations (18 C.F.R. §39.1 and §39.10) must be approved by NERC and then submitted to and approved by the Commission. See April 19 Order at PP 245, 249, 275, 280, 298, 302, 333, 339, 366, 371, 404, 419, 457, 473, 553 and 557.

³The previous regularly-scheduled meeting of the NERC Board was held on July 31-August 1, 2007. NERC and the Regional Entities would not have been able to assemble the substantial compliance filing to the April 19 Order in time for the NERC Board to review and approve the filing and associated documents at that meeting.

WHEREFORE, the North American Electric Reliability Corporation respectfully requests a 14-day extension of time, from October 16, 2007 to October 30, 2007, to file its compliance filing in response to the Commission's Order issued April 19, 2007 in the above-captioned dockets.

Respectfully submitted,

/s/ Rick Sergel

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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 Chicago, Illinois this 5th day of October, 2007.

/s/ Owen E. MacBride
Owen E. MacBride

*Attorney for North American Electric
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Submission Contents

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