

**UNITED STATE OF AMERICA  
BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION**

**GRID RELIABILITY AND RESILIENCE        )**  
**PRICING**

**RM-18-1-000**

**MOTION OF THE NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER  
ADVOCATES IN SUPPORT OF THE ENERGY INDUSTRY ASSOCIATIONS’  
MOTION FOR EXTENSION OF TIME AND REQUEST FOR EXPEDITED  
TREATMENT**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission” or “FERC”), 18 C.F.R § 385.212 (2016), the National Association of State Utility Consumer Advocates (“NASUCA”) hereby files this motion in support of the *Joint Motion for Extension of Time and Request for Expedited Treatment of the Energy Associations*, filed in this docket on October 3, 2017, and the *Joint Motion of the Energy Associations in Response to the Secretary of Energy’s Requests for and Interim Final Rule and an Expedited Time Frame for Comment and Consideration* filed in this Docket on October 2, 2017.

NASUCA is a voluntary association of 44 consumer advocate offices in 41 states and the District of Columbia, incorporated in Florida as a non-profit corporation. NASUCA’s members are designated by laws of their respective jurisdictions to represent the interests of utility consumers before state and federal regulators and in the courts. Members operate independently from state utility commissions as advocates for utility ratepayers. Some NASUCA member offices are separately established advocate organizations while others are divisions of larger state agencies (e.g., the state Attorney General’s office). NASUCA’s associate and affiliate members

also serve utility consumers but are not created by state law or do not have statewide authority.

A list of current NASUCA members can be found at <http://nasuca.org/members/>.

The rulemaking proposed in this docket represents a fundamental change in how markets operate and will materially affect the price that tens of millions of residential and business consumers pay for electricity. The residential and business customers represented by NASUCA member offices have an interest in the outcome of this proceeding. Given the paramount importance of the questions raised by this proceeding, NASUCA member offices believe that adequate time to both develop an appropriate record and to respond to those questions is critical. The questions raised in this proceeding require careful consideration and an opportunity for meaningful participation by NASUCA members. NASUCA strongly supports the Energy Industry Associations' motion for an extension of time to file comments in this proceeding and to allow for a minimum of a ninety (90) day initial comment period and a forty-five (45) day reply comment period.

Respectfully submitted,

/David Springe/s

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