

**Organization of PJM States, Inc. (OPSI)**

62 N. Chapel Street, Suite 203, Newark, DE 19711 • Tel: 302- 266-0914 • www.opsi.us

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Delaware Public Service Commission • District of Columbia Public Service Commission • Illinois Commerce Commission  
Indiana Utility Regulatory Commission • Kentucky Public Service Commission • Maryland Public Service Commission  
Michigan Public Service Commission • New Jersey Board of Public Utilities • North Carolina Utilities Commission  
Public Utilities Commission of Ohio • Pennsylvania Public Utility Commission • Tennessee Regulatory Authority  
Virginia State Corporation Commission • Public Service Commission of West Virginia.

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April 17, 2008

Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426  
(By Electronic Filing)

**Re: Wholesale Competition in Regions with Organized Electric Markets,  
Docket Nos. RM07-19-000, AD07-7-000; Motion for Extension of Comment Due Date**

Dear Ms. Bose:

Please accept for filing in the above-referenced matter an electronically-filed Motion for Extension of Comment Due Date on behalf of the Organization of PJM States, Inc. Service has been made upon the service list as evidenced by the attached certificate of service.

Thank you for your attention to this matter. If you have any questions in reference to this filing, please contact me at (302) 757-2441.

Sincerely,  
*s/ Rajnish Barua*  
Rajnish Barua  
Executive Director  
Organization of PJM States, Inc.  
62 N. Chapel Street, Suite 203  
Newark, DE 19711

Enclosure

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

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Wholesale Competition in Regions	)	Docket Nos. RM07-19-000
with Organized Electric Markets	)	AD07-7-000

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**MOTION OF THE ORGANIZATION OF PJM STATES, INC.  
FOR EXTENSION OF COMMENT DUE DATE**

The Organization of PJM States, Inc. (“OPSI”)<sup>1</sup> hereby moves the Commission for a 30-day extension to Wednesday, May 21, 2008, for the filing of its comments.

All communications with respect to this matter should be addressed as follows:

Rajnish Barua  
Executive Director  
Organization of PJM States, Inc.  
62 N. Chapel Street, Suite 203  
Newark, DE 19711  
email: raj@opsi.us

**MOTION FOR EXTENSION OF COMMENT DUE DATE**

1. On June 22, 2007 the Commission issued its Advanced Notice of Proposed Rulemaking concerning Wholesale Competition in Regions with Organized Electric Markets.<sup>2</sup> OPSI filed extensive comments on September 18, 2007. On February 22, 2008, the Commission issued its

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<sup>1</sup> The Organization of PJM States, Inc. (“OPSI”) is a Delaware non-stock corporation whose membership consists of all 14 state regulatory commissions within the footprint of PJM Interconnection, LLC (“PJM”). OPSI is organized for the purpose of providing a regional forum for state regulatory authorities on issues affecting the transmission system functions performed and wholesale electricity markets operated by PJM. No vote of, or resolution passed by, the Board of Directors has any binding effect upon any state regulatory authority or any individual member thereof in the exercise of such authority's powers. Actions or positions taken by OPSI do not constitute official actions or positions of any individual member regulatory authority.

<sup>2</sup> 119 FERC ¶ 61,306 (2007)

Notice of Proposed Rulemaking concerning Wholesale Competition in Regions with Organized Electric Markets. Initial comments are due on April 21, 2008.

2. OPSI is an organization of the state utility regulatory commissions created pursuant to the laws of their respective states<sup>3</sup> that are charged with the regulation of electric utilities and/or of generation suppliers where retail electric generation competition has been authorized.

3. OPSI, pursuant to its obligation to further the public interest in safe, adequate and reliable electric service at just and reasonable rates, desires to comment in the above captioned matter.

As an organization comprising all of the state utility regulatory agencies within the PJM footprint, OPSI has a unique interest in this proceeding. Each of OPSI's member commissions has a vital interest in the reliability of the transmission system and the efficacy of the wholesale electric markets that this filing will affect. Each of OPSI's member commissions has been delegated individual statutory responsibilities with respect to provision of retail electric service within its boundaries and has a statutory obligation to ensure the provision of safe, adequate and reliable electric service at just and reasonable rates. As part of their obligation to ensure the provision of reasonably-priced electric service, OPSI member commissions are vitally interested in the establishment and operation of effective and fair wholesale electric markets. No other party is able to adequately represent OPSI's unique interests in this proceeding.

4. OPSI believes that it can provide comments developed on a regional basis that would be helpful to the Commission in its deliberations. The development of draft comments for consideration by OPSI's membership can be a time-consuming process. In addition, due to

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<sup>3</sup> State commissions that are current members of OPSI are: Delaware Public Service Commission; District of Columbia Public Service Commission; Illinois Commerce Commission; Indiana Utility Regulatory Commission; Kentucky Public Service Commission; Maryland Public Service Commission; Michigan Public Service Commission; New Jersey Board of Public Utilities; North Carolina Utilities Commission; Public Utilities Commission of Ohio; Pennsylvania Public Utility Commission; Tennessee Regulatory Authority; Virginia State Corporation Commission; and Public Service Commission of West Virginia.

individual jurisdictional laws governing each OPSI member commission, some of OPSI's members have to decide on their comments in their individual commission meetings after providing proper notice. Such meetings are held at different days of each month, so that gathering the requisite affirmative votes for OPSI to file comments as one group can become a lengthy process.

5. Given the importance of this NOPR, which may materially affect every wholesale and retail customer in the PJM region, and the need for additional time to develop consensus-based OPSI comments, OPSI believes that the Commission should grant a 30-day extension to Wednesday, May 21, 2008, for the filing of initial comments.

WHEREFORE, OPSI respectfully requests that the Commission extend the due date for filing comments to May 21, 2008.

Respectfully submitted,

s/ Rajnish Barua  
Rajnish Barua  
Executive Director  
Organization of PJM States, Inc.  
62 N. Chapel Street, Suite 203  
Newark, DE 19711

Dated: April 17, 2008

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each party designated on the official service list compiled by the Secretary in Docket Nos. RM07-19-000 and AD07-7-000 in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Dated this 17th day of April, 2008.

s/ Rajnish Barua  
Rajnish Barua  
Executive Director  
Organization of PJM States, Inc.  
62 N. Chapel Street, Suite 203  
Newark, DE 19711  
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