

stakeholder can reasonable assert the need for additional time to review and analyze the proposal.

Although Powerex correctly notes that PacifiCorp has yet to file its corresponding revisions to its open access tariff, Powerex will have the opportunity to comment on those revisions when they are filed. Powerex also points to the fact that the Energy Imbalance Market builds on the ISO's fifteen-minute market tariff amendment filed in Docket No. ER14-480-000, on which the Commission has not ruled. Whatever the impact of the Commission's ruling may be, it should not interfere with Powerex's ability to comment on the Energy Imbalance Market provisions as filed.

Moreover, the ISO has requested a ruling by June 20, 2014, in order to allow implementation of the new market on October 1, 2014. Powerex's requested extension would allow the Commission less than two months to review the amendment if the Commission is to issue a ruling before the scheduled market simulation, as the ISO has requested. Stakeholders, including Powerex, have had almost a year to review and evaluate the ISO's proposal. The Commission's time to review the filing should not be unnecessarily curtailed.

Nonetheless, in the event the Commission believes it is appropriate to provide interested parties with additional time to submit comments, the ISO would not object to a modest extension of the comment period by no more than five business days.

Respectfully submitted,

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Dated: March 6, 2014

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each party listed on the official service list for this proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010 (2013)).

Dated at Washington, D.C. on this 6th day of March, 2014.

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