

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ENERGY MARKET REGULATION

In Reply Refer To:
Cobb Electric Membership
Corporation
Docket No. ER15-2112-000

July 23, 2015

Mr. Daniel E. Frank
Counsel for Cobb Electric Membership Corporation
Sutherland Asbill & Brennan LLP
700 Sixth Street, N.W.
Suite 700
Washington, D.C. 20001

Reference: Updated Market Power Analysis in Compliance with Order No. 697 and
Tariff Revisions

Dear Mr. Frank:

On July 6, 2015, in Docket No. ER15-2112-000, Cobb Electric Membership Corporation (Cobb Electric) filed an updated market power analysis for the Southeast region in compliance with the regional reporting schedule adopted in Order 697,¹ and a revised market-based rate tariff. The revised market-based rate tariff updates Cobb Electric's category status and makes other ministerial updates. Cobb Electric chose eTariff Type of Filing Code 30 (Rate Schedule Change Other Than Rate Increases) when submitting the filing in eTariff instead of Code 1120 (Market Based Rate Triennial Review).

¹ *Market-Based Rates for Wholesale Sales of Electric Energy, Capacity and Ancillary Services by Public Utilities*, Order No. 697, FERC Stats. & Regs. ¶ 31,252 at PP 882-893, *clarified*, 121 FERC ¶ 61,260 (2007), *order on reh'g*, Order No. 697-A, FERC Stats. & Regs. ¶ 31,268, *clarified*, 124 FERC ¶ 61,055, *order on reh'g*, Order No. 697-B, FERC Stats. & Regs. ¶ 31,285 (2008), *order on reh'g*, Order No. 697-C, FERC Stats. & Regs. ¶ 31,291 (2009), *order on reh'g*, Order No. 697-D, FERC Stats. & Regs. ¶ 31,305 (2010), *aff'd sub nom. Mont. Consumer Counsel v. FERC*, 659 F.3d 910 (9th Cir. 2011), *cert. denied*, 133 S. Ct. 26 (2012).

Because the proposed tariff revisions are being submitted in the same filing as the updated market power analysis, the Commission will treat the July 6, 2015, filing as a non-statutory updated market power analysis and not as a statutory tariff revision.

Sincerely,

Steve P. Rodgers, Director
Division of Electric Power
Regulation - West