



certain Area Control Error (ACE) data on its open access same-time information system (OASIS) as described in the Final Rule. Third, the Commission revised the accounting and reporting requirements under its Uniform System of Accounts for public utilities and licensees and its forms, statements, and reports contained in FERC Form No. 1, Annual Report of Major Electric Utilities, Licensees and Others, FERC Form No. 1-F, Annual Report for Nonmajor Public Utilities and Licensees, and FERC Form No. 3-Q, Quarterly Financial Report of Electric Utilities, Licensees, and Natural Gas Companies, to better account for and report transactions associated with the use of energy storage devices in public utility operations.

3. Edison Electric Institute (EEL), Powerex Corporation (Powerex), WSPP Inc. (WSPP), and Southern California Edison Company (SCE) submitted requests for clarification. The Commission grants the clarification in part and denies clarification in part as discussed below.

## **II. Discussion**

### **A. Ancillary Service Market-Based Rate Issues**

#### **1. Final Rule**

4. In Order No. 784, the Commission established that sellers found to lack market power in a geographic market, and which are granted market-based rate authority to make sales of energy and capacity, will also be granted market-based rate authority for sales of Energy Imbalance and Generator Imbalance services to public utility transmission providers within the same balancing authority area, or to public utility transmission providers in different balancing authority areas, if those areas allow transmission customers to modify or create transmission schedules within the hour.<sup>3</sup>

5. In addition, the Commission determined that it will allow third-party sellers passing existing market power screens for energy and capacity to sell Operating Reserve-Spinning and Operating Reserve-Supplemental services at market-based rates to a public utility transmission provider within the same balancing authority area, or to a public utility transmission provider in a different balancing authority area, if within-hour transmission scheduling practices in those areas support the delivery of operating reserve resources from one balancing authority area to another.<sup>4</sup> The Commission stated that its approach for market-based rate sales of operating reserves differs slightly from the reforms adopted for sales of imbalance services and implemented a requirement for potential sellers of operating reserves to explain in their market-based rate applications

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<sup>3</sup> Order No. 784, FERC Stats. & Regs. ¶ 31,349 at P 41.

<sup>4</sup> *Id.* PP 54, 57.

for such authority how the scheduling practices in their region support the use of operating reserves.<sup>5</sup>

6. In Order No. 784, the Commission also determined that it will allow applicants to engage in market-based rate sales of ancillary services to a public utility that is purchasing ancillary services to satisfy its own OATT requirements where the sale is made pursuant to a competitive solicitation meeting certain requirements.<sup>6</sup> The Commission stated that there may be multiple methods of demonstrating adequate competitiveness and the Commission will review such proposals on a case-by-case basis. The Commission explained that this demonstration must be made through a filing under section 205 of the Federal Power Act,<sup>7</sup> submitted by the seller to the Commission prior to commencement of service under the third-party ancillary service sales agreement that results from the competitive solicitation and the third-party seller will need to submit both the actual sales agreement and a narrative description of how the buyer's competitive solicitation meets the requirements of the Final Rule.<sup>8</sup>

## 2. Requests for Clarification

7. WSPP seeks clarification as to whether the intra-hour transmission scheduling required to permit sales of imbalance services and operating reserve services under existing market-based rate authority must be the 15-minute scheduling required by Order No. 764,<sup>9</sup> or whether less frequent scheduling changes (e.g., every 30 minutes) would suffice.<sup>10</sup> Similarly, Powerex seeks clarification that market-based rate sales of Energy Imbalance and Generator Imbalance services may be made in any balancing authority area that permits intra-hour schedule changes and is willing to take dispatch of energy intra-hour for ancillary services, even if the relevant balancing authority has not yet formally implemented the specific form of intra-hour scheduling required in Order No. 764.<sup>11</sup>

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<sup>5</sup> *Id.* P 58.

<sup>6</sup> *Id.* PP 99-101.

<sup>7</sup> 16 U.S.C. § 824d (2012).

<sup>8</sup> Order No. 784, FERC Stats. & Regs. ¶ 31,349 at P 101.

<sup>9</sup> *Integration of Variable Energy Resources*, Order No. 764, FERC Stats. & Regs. ¶ 32,331 at P 91, *order on reh'g*, Order No. 764-A, 141 FERC ¶ 61,232 (2012).

<sup>10</sup> WSPP Request for Clarification at 4-5.

<sup>11</sup> Powerex Request for Clarification at 5.

8. Powerex seeks clarification as to whether the section 205 filing requirement to demonstrate adequate competitiveness would apply only to sales of ancillary services that the Commission did not otherwise authorize in Order No. 784 or to sales of all ancillary services that a public utility transmission provider seeks to procure through a competitive solicitation. Powerex contends that additional clarification is needed on this point to ensure that potential third-party suppliers of ancillary services are fully aware of their section 205 filing obligations.

9. Powerex argues that the section 205 filing requirement should be limited to sales of those ancillary services not otherwise authorized in Order No. 784 and therefore would not apply to market-based rate sales of Energy Imbalance, Generator Imbalance, or operating reserves where transmission providers have adopted adequate scheduling practices, or to sales of Regulation and Frequency Response at prices below the transmission provider's OATT rate for such services. Powerex argues that, otherwise, the Commission may unnecessarily burden third-party sales of these services and deter the development of competitive ancillary services markets.

10. Powerex also notes that in the Final Rule, the Commission stated that "sales of Energy Imbalance and Generator Imbalance services to entities other than a public utility transmission provider remain authorized under *Avista*."<sup>12</sup> Powerex requests that the Commission clarify this statement. In particular, Powerex states that its understanding of the Commission's *Avista* restrictions on market-based rate sellers' authorizations to make third-party ancillary services sales is that those restrictions do not apply to "non-public utility" transmission providers, such as U.S. government-owned entities that are exempted from the definition of "public utility" under section 201(f) of the Federal Power Act.<sup>13</sup> Rather, Powerex submits, the restrictions set forth in *Avista* apply only to "public utility" transmission providers, and thus any ancillary services sales to non-public utilities do not require separate authorization from the Commission.

11. Powerex states that to eliminate uncertainty, if any, particularly in view of the large number of non-public utility transmission providers in the West, Powerex requests that the Commission confirm that the restrictions do not apply to third-party ancillary services sales to non-public utility transmission providers.<sup>14</sup>

### **3. Commission Determination**

12. With respect to sales of Energy Imbalance and Generator Imbalance services, we clarify that any intra-hour transmission scheduling practice would be sufficient to meet

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<sup>12</sup> *Id.* at 11 (citing Order No. 784, FERC Stats. & Regs. ¶ 31,349 at n.48).

<sup>13</sup> 16 U.S.C. § 824(f).

<sup>14</sup> Powerex Request for Clarification at 11.

Order No. 784's new requirements. As discussed in Order No. 784, under the *pro forma* OATT, imbalances are calculated on an hourly basis, which means that any resources capable of delivery within the hour can compete to provide these services.<sup>15</sup>

Accordingly, all resources within a relevant geographic market that permits intra-hour transmission scheduling can compete to provide Energy Imbalance and Generator Imbalance services. This would hold true both for the 15-minute transmission scheduling required by Order No. 764, and for other intra-hour transmission scheduling intervals such as 30-minute scheduling.

13. We note that, while Powerex requested this clarification only with respect to Energy Imbalance and Generator Imbalance services, WSPP also requested this clarification with respect to operating reserve services.<sup>16</sup> This clarification does not apply to operating reserve services. As discussed in Order No. 784,<sup>17</sup> Operating Reserve-Spinning service is defined in the *pro forma* OATT as being provided by resources that are available immediately and Operating Reserve-Supplemental service is defined in the *pro forma* OATT as being provided by resources that are available within a short period of time. Both of these requirements may be more stringent than the intra-hour requirement associated with imbalance services. For this reason, Order No. 784 placed a burden on potential sellers of Operating Reserve-Spinning and Operating Reserve-Supplemental services to satisfactorily explain in their market-based rate applications how the particular transmission scheduling practices in their regions support the use of operating reserves.<sup>18</sup> Rather than attempt to prejudge what hypothetical transmission scheduling practices might support the use of operating reserves across multiple balancing authority areas, we believe it is more appropriate to leave that burden on potential sellers of operating reserve services at this time. However to aid the industry, we will provide additional discussion of our concerns in this regard.

14. The Commission's intent is to allow potential sellers to use the existing market power screens applicable to sales of energy and capacity to also demonstrate lack of market power for sales of operating reserves, preferably without significant modification to those screens. Those screens incorporate a default geographic market that reflects imports from first-tier balancing authority areas up to the study area's simultaneous transmission import limit under an assumption that first-tier resources face no significant barriers to competing with resources in the home balancing authority area. For this to be true with respect to operating reserves, transmission scheduling practices must support

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<sup>15</sup> *Id.* P 36.

<sup>16</sup> WSPP Request for Clarification at 5.

<sup>17</sup> Order No. 784, FERC Stats. & Regs. ¶ 32,331 at P 58.

<sup>18</sup> *Id.*

the ability of a first-tier resource to respond to dispatch needs in a neighboring balancing authority area in the time frame required by the operating reserve service at issue.

15. Unlike energy, capacity, or imbalance services, Operating Reserve-Spinning is defined in the OATT as available to serve load “immediately” in the event of a contingency. Accordingly, for a seller to be able to rely on the existing market power screens without modification to demonstrate lack of market power for sales of Operating Reserve-Spinning, the applicant would need to show among other things that resources in first-tier balancing authority areas can change their output “immediately” in response to a contingency in the home balancing area. A sufficient showing on this issue should include a detailed discussion of how the transmission scheduling practices or other protocols in the region permit that level of response. Similarly, for sales of Operating Reserve-Supplemental, a seller should show how the transmission scheduling practices or other protocols in its region permit a unit in one balancing authority area to respond within a “short period of time” to contingencies in the home balancing authority area.

16. The Commission also grants the clarification requested by Powerex regarding filing requirements. The section 205 filing requirement for sales of ancillary services made pursuant to a competitive solicitation applies only to sales not otherwise authorized in Order No. 784. We agree that it would be somewhat redundant to require sellers to make the section 205 filing for ancillary service sales that already are authorized under their market-based rate tariff.

17. We further grant Powerex’s request for clarification that the *Avista* restrictions do not apply to non-public utilities. In *Avista*, the Commission concluded that third party ancillary service sellers that cannot perform a market power study should be allowed to sell ancillary services at flexible rates except in certain specified circumstances.<sup>19</sup> The Commission stated that it would not apply this approach to sales of ancillary services by a third-party supplier in the following situations: (1) sales to an RTO or an ISO, which has no ability to self-supply ancillary services but instead depends on third parties;<sup>20</sup> (2) sales to a traditional franchised public utility affiliated with the third-party supplier, or sales where the underlying transmission service is on the system of the public utility affiliated with the third-party supplier; and (3) sales to a public utility who is purchasing ancillary services to satisfy its own OATT requirements to offer ancillary services to its own customers.<sup>21</sup> Thus, sales to non-public utility transmission providers were not

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<sup>19</sup> *Avista*, 87 FERC ¶ 61,223 at 61,883.

<sup>20</sup> Subsequently, as the Commission recognized in Order No. 697, most RTOs and ISOs developed formal ancillary service markets, thus rendering this component of the *Avista* policy largely superfluous. See Order No. 697, FERC Stats. & Regs. ¶ 31,252 at n.1194 and P 1069.

<sup>21</sup> *Id.* at n.12.

subject to the preceding *Avista* restrictions. By noting in the Final Rule that “sales of Energy Imbalance and Generator Imbalance services to entities other than a public utility transmission provider remain authorized under *Avista*,” the Commission did not intend to alter the *Avista* policy as it relates to sales to “non-public utility” transmission providers.

## **B. Regulation Reserve Transparency and Self-Supply Issues**

### **1. Final Rule**

18. In Order No. 784, the Commission concluded that reforms were necessary to address the potential for undue discrimination against transmission customers choosing to self-supply Regulation and Frequency Response, including through purchases from third-parties. The Commission instituted a requirement that each public utility transmission provider add to its OATT Schedule 3 a statement that it will take into account the speed and accuracy of regulation resources in its determination of reserve requirements for Regulation and Frequency Response service, including as it reviews whether a self-supplying customer has made “alternative comparable arrangements” as required by the Schedule. This statement will also acknowledge that, upon request by the self-supplying customer, the public utility transmission provider will share with the customer its reasoning and any related data used to make the determination of whether the customer has made “alternative comparable arrangements.” To aid the transmission customer’s ability to make an “apples-to-apples” comparison of regulation resources, Order No. 784 also requires each public utility transmission provider to post on OASIS historical one-minute and 10-minute ACE data as described in the Final Rule for the most recent calendar year, and update this posting once per year.<sup>22</sup>

19. The Commission concluded that with this information, a transmission customer will be in a position to demonstrate to the public utility transmission provider that the resource(s) it selects for self-supply are comparable to those of the public utility transmission provider. The Commission stated that acknowledging the speed and accuracy of the resources used to provide this service will help to ensure that self-supply requirements of the public utility transmission provider do not unduly discriminate by requiring customers to procure a different amount of regulation reserves than the particular speed and accuracy characteristics of the resources in question justify (i.e., to be comparable, a customer self-supply arrangement that relies on slower, less accurate resources than those of the public utility transmission provider might require a larger reserve requirement than would a purchase from the transmission provider and a customer's self-supply arrangement that relies on faster, more accurate resources than

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<sup>22</sup> Order No. 784, FERC Stats. & Regs. ¶ 32,331 at PP 3-4.

those of the public utility transmission provider should entail a smaller reserve requirement than would a purchase from the transmission provider).<sup>23</sup>

## 2. Requests for Clarification

20. Powerex states that it strongly supports the Commission's efforts to encourage self-supply arrangements. However, Powerex states that it is aware of certain situations in which transmission providers have attempted to limit customers' abilities to self-supply through imposing charges on customers who seek to do so, proposing an all-or-nothing approach to self-supply that requires self-supplying customers to supply 100 percent of their reserve obligations or to procure all reserves from the transmission provider, and in one circumstance, establishing an outright cap on the amount of reserves a customer may self-supply. Powerex states that it understands and supports transmission providers' need to require customers to elect to self-supply for a specified term (e.g., one year) to ensure that customers do not attempt to "cherry-pick" and self-supply in hours or seasons when market prices are low, and switch back to taking service from the transmission provider when market prices are higher. However, Powerex requests the Commission to clarify that transmission providers may not limit the quantity a customer may self-supply, absent verifiable operational reasons for doing so. Powerex also requests the Commission to clarify that transmission providers may not require self-supplying customers to supply a greater quantity of reserves than what is required if the reserves are procured from the transmission provider under its OATT.

21. Powerex argues that absent these clarifications to customers' rights to self-supply, transmission providers may seek to limit self-supply options in the interest of maintaining their own ancillary services sales. Powerex argues that any such limits, without justifiable operational reasons, will undercut the reforms the Commission is attempting to accomplish in Order No. 784, act as a barrier to the development of fully competitive ancillary services markets, and may result in unjust and unreasonable ancillary services rates. EEI requests that the Commission clarify that the deadline for the requirement to post historical ACE data on the OASIS comports with the effective date for each transmission provider's revised OATT Schedule 3, that is, by February 25, 2014. EEI submits that this deadline would provide an initial 30 days from the effective date of Order No. 784 for tariff holders to file revised Schedule 3, and allow for a 60-day prior notice period (such that public utility transmission providers would be required to post their ACE data by February 25, 2014).<sup>24</sup>

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<sup>23</sup> *Id.*

<sup>24</sup> EEI Request for Clarification at 2.

22. EEI states that while there are several effective dates and deadlines indicated in the Final Rule, there is no date listed for the implementation of the ACE data posting. EEI argues that its members will be able to compile and post the required ACE data described in the Final Rule if the implementation date is the same as the effective date of the OATT Schedule 3 revisions. EEI submits that given that the ACE data posting requirement is provided hand in hand with the OATT Schedule 3 requirements, EEI believes that the Commission intended for these two new requirements to be implemented together, within the same timeframe. EEI therefore requests that the Commission clarify that, under the Final Rule, public utility transmission providers must make the required revision to OATT Schedule 3 and post historical one-minute and ten-minute ACE data to OASIS within 90 days of the effective date of the Final Rule (i.e., allowing for the lapse of 30 days for tariff revisions to be filed, plus the required 60-day notice period for a tariff change to become effective.)<sup>25</sup>

### **3. Commission Determination**

23. We grant Powerex's request in part and deny it in part. Nothing in Order No. 784 is intended to permit transmission providers to limit the quantity or percentage of total reserve obligations that a customer may self-supply, absent verifiable operational reasons for doing so, and we grant Powerex's requested clarification to that extent. Further, we note that there is nothing in the OATT limiting the quantity or percentage of total reserve obligation that a transmission customer may self-supply. However, we deny Powerex's request that the Commission clarify that transmission providers may not require self-supplying customers to supply a greater quantity of reserves than what is required if the reserves are procured from the transmission provider under its OATT. Although the reforms adopted in Order No. 784 were necessary to address the potential for undue discrimination against transmission customers choosing to self-supply Regulation and Frequency Response, including through purchases from third-parties, as noted in the Final Rule and above, to be comparable, a customer self-supply arrangement that relies on slower, less accurate resources than those of the public utility transmission provider might require a larger reserve requirement than a purchase from the transmission provider, and vice versa.

24. With respect to ACE data posting, we clarify that public utility transmission providers must post historical one-minute and ten-minute ACE data to OASIS within 30 days after the issuance of this order. In the Final Rule, the Commission stated that transmission customers considering whether or not there would be any economic advantage to self-supply of Regulation and Frequency Response service requirements would need to be able to make an "apples-to-apples" comparison of their resources to those of their public utility transmission provider.<sup>26</sup> Doing so would require the

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<sup>25</sup> *Id.* at 4.

<sup>26</sup> Order No. 784, FERC Stats. & Regs. ¶ 32,331 at P 115.

transmission customer to know both the potential avoided cost of purchasing from its public utility transmission provider and some measure of the speed and accuracy of the public utility transmission provider's Regulation resources. The Commission stated that the first requirement is met through the rate filed in the public utility transmission provider's OATT Schedule 3 and the second requirement can only be met through a new OASIS posting requirement.<sup>27</sup> Although we agree that the ACE data posting requirement should be provided hand in hand with the OATT Schedule 3 requirements, because the Commission did not specify an effective date in the Final Rule, we clarify that the deadline for the requirement to post the ACE data on OASIS is 30 days after issuance of this order to ensure that public utility transmission providers have adequate time to implement the Final Rule's requirements.

**C. Accounting and Reporting Issues**

**1. Account 555.1**

**a. Final Rule**

25. In Order No. 784, the Commission adopted Account 555.1, Power Purchased for Storage Operations, to report the cost of power purchased for energy storage operations. This new account requires the reporting of: (1) power purchased and stored for resale; (2) power purchased that will not be resold but instead consumed in operations during the provisioning of services; (3) power purchased to sustain a state of charge; and (4) power purchased to initially attain a state of charge, with item 4 being capitalized as a component cost of initially constructing the asset.<sup>28</sup>

**b. Request for Clarification**

26. SCE states that it interprets the description and definition of Account 555.1 to be a "catch all" account within the power production classification that includes all costs of power purchased for energy storage operations regardless of whether the associated energy storage device is a power production, transmission, or distribution device. SCE asserts that for ratemaking purposes it is important for all costs related to transmission and distribution, including any associated power purchased cost, to be included in the correct rates. Accordingly, SCE seeks clarification that all costs of power purchased for energy storage operations do not have to be recorded to Account 555.1 and that power purchased costs for energy storage devices classified as transmission or distribution are recorded in the appropriate transmission and distribution operation expense accounts.<sup>29</sup>

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<sup>27</sup> *Id.*

<sup>28</sup> *Id.* PP 142 and 145.

<sup>29</sup> SCE Request for Clarification at 2.

Alternatively, SCE requests clarification that power purchased costs recorded in Account 555.1 associated with operation of transmission or distribution devices be assigned to the appropriate transmission or distribution function for ratemaking purposes.<sup>30</sup>

**c. Commission Determination**

27. We deny SCE's requested clarification that power purchased costs for energy storage devices classified as transmission or distribution may be recorded in transmission and distribution operation expense accounts. Account 555.1 is intended to include all costs of power purchased for energy storage operations without regard to the classification of the associated energy storage device used in operations. In Order No. 784, the Commission determined that transparency of costs associated with energy storage operations is required. However, SCE's requested clarification would reduce the transparency of power purchased costs for energy storage devices.

28. Regarding SCE's alternative request, we clarify that the accounting requirements of Account 555.1 are without prejudice to the ratemaking practice or treatment that may be afforded costs recorded in the account. Recovery of costs associated with energy storage operations must be consistent with the provisions of a utility's approved rate recovery method or mechanism.

29. We additionally note that in Order No. 784, the Commission stated that utilities transferring energy storage plant costs from an existing plant account under a particular functional classification to an adopted energy storage plant account under the same functional classification may submit a compliance filing to incorporate the energy storage plant account into existing formula rate cost recovery mechanisms.<sup>31</sup> We further clarify that the energy storage operation and maintenance expense accounts, including Account 555.1, may be incorporated into existing formula rates pursuant to a compliance filing. Each utility must make its compliance filing as an eTariff filing, and the Commission will assign each utility's compliance filing a separate docket and provide interested parties an opportunity to intervene in those dockets.

**2. Implementation Date**

**a. Final Rule**

30. In Order No. 784, the Commission required utilities subject to the Commission's accounting and reporting requirements to implement the new requirements as of

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<sup>30</sup> *Id.* at 2-3.

<sup>31</sup> Order No. 784, FERC Stats. & Regs. ¶ 32,331 at PP 173-175.

January 1, 2013.<sup>32</sup> The Commission also addressed EEI's comment that it would not be beneficial or cost effective to require utilities to retroactively amend prior year reports, and that the accounting and reporting requirements be effective prospectively only. The Commission acknowledged that there may be benefits to requiring utilities with energy storage assets to retroactively implement the requirements to provide a transparent historical record of these utilities' energy storage operations. However, the Commission determined that such historical information would not be necessary to provide oversight of these utilities' energy storage operations going forward.<sup>33</sup> Consequently, rather than require utilities with energy storage assets and operations to retroactively amend and resubmit previously filed reports (i.e., FERC Form Nos. 1, 1-F, and 3-Q, Annual and Quarterly Reports), the Commission established January 1, 2013 as the implementation date.

**b. Request for Clarification**

31. EEI seeks further clarification of the implementation date. EEI asserts that although the Commission indicated that utilities are not required to retroactively implement the accounting and reporting requirements, the Commission nonetheless directed utilities to implement the requirements as of January 1, 2013. Further, EEI maintains that Order No. 784 repeats this requirement, along with the January 1, 2013 date, in the "Summary of Compliance and Implementation" section.<sup>34</sup> EEI asks whether the Commission intended to require the accounting and reporting requirements be implemented in filings made after January 1, 2014. EEI states that the January 1, 2014 date is consistent with the Commission's statement that it would not make the reporting and accounting requirements retroactive. Therefore, EEI requests that the Commission clarify that the accounting and reporting requirements be implemented in filings made after January 1, 2014.<sup>35</sup>

**c. Commission Determination**

32. We deny EEI's request for clarification. Order No. 784 directs utilities with energy storage assets and operations to implement the accounting and reporting requirements as of January 1, 2013, i.e., in the 2013 FERC Form Nos. 1 and 1-F that must be filed with the Commission by April 18, 2014. In its consideration of the implementation date of the requirements, including whether retroactive accounting would be required, the Commission weighed the perceived costs of implementation against the

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<sup>32</sup> 2013 Form Nos. 1 and 1-F must be filed by April 18, 2014.

<sup>33</sup> Order No. 784, FERC Stats. & Regs. ¶ 32,331 at P 182.

<sup>34</sup> EEI Motion for Clarification at 4.

<sup>35</sup> *Id.* at 5.

expected benefits. The Commission determined that information on energy storage operations going forward would be sufficient. Thus, utilities are not required to retroactively amend and resubmit previously filed reports nor are the utilities required to adjust prior year, comparative information included in 2013 reports for periods prior to January 1, 2013.

33. By directing a January 1, 2013 implementation date, data reported in the 2013 FERC Form Nos. 1 and 1-F, which are required to be filed by April 18, 2014, will be included in utilities' future formula rates that are established based on historical data reported in the 2013 FERC Form Nos. 1 and 1-F.<sup>36</sup> Thus, the January 1, 2013, implementation date provides the improved transparency and oversight of utilities' energy storage operations on a going forward basis as contemplated by Order No. 784. EEI has not provided information that supports a later implementation date. We therefore deny clarification and reaffirm that utilities are required to implement the accounting and reporting requirements as of January 1, 2013.

The Commission orders:

The requests for clarification are granted in part and denied in part as discussed in the body of this order.

By the Commission.

( S E A L )

Nathaniel J. Davis, Sr.,  
Deputy Secretary.

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<sup>36</sup> This implementation date does not require utilities to resubmit 2013 quarterly reports filed in the FERC Form No. 3-Q.