

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

**GRID RELIABILITY AND RESILIENCE PRICING : Docket No. RM18-1-000**

**COMMENTS OF THE UNITED CONSUMER ADVOCATES**

The comments that follow are submitted by the undersigned state consumer advocate offices. All of the offices have been created pursuant to statute in their respective states and charged with representing the interests of end use customers in both state and federal utility regulatory and policy proceedings. Collectively, this group refers to itself as United Consumer Advocates (UCA).

UCA files this motion in support of the *Comments of Joint Consumer Advocates of the PJM Region*, filed in this docket on October 23, 2017, and the *Responses of Joint Consumer Advocates to Commission Questions*, filed in this docket on October 23, 2017. While each Commission-approved independent system operator or regional transmission organization is different, the Grid Resiliency Pricing Rule (NOPR) being proposed represents a fundamental change in how markets operate and will materially affect the price that millions of residential and business consumers pay for electricity. As a result, UCA supports the *Comments* and *Responses* referred to above generally in content and conclusion.

UCA further 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 UCA. UCA respectfully requests that the proposed rule not be promulgated by FERC in the reduced

timeline proposed in the Notice but that a full proceeding with adequate time to develop a record and review the positions of the stakeholders be provided.

Respectfully submitted,

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Dated: October 23, 2017

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Dated: October 23, 2017

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