

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Review of the Commission's Rules Governing the) WT Docket No. 17-200
896-901/935-940 MHz Band)
)

To: The Commission

**JOINT MOTION FOR EXTENSION OF TIME DUE TO
EMERGENCY CONDITIONS**

Pursuant to Section 1.46 of the Commission's rules,¹ the following parties ("Petitioners") respectfully request a two week extension of the time set for filing initial comments and reply comments in the above-captioned proceeding to allow certain Petitioners and other critical infrastructure entities in the Southeast U.S. and other affected areas of the country to focus efforts during the next several weeks on disaster preparation and recovery efforts: NextEra Energy, Inc.,² the Edison Electric Institute,³ Duke Energy,⁴ the Lower Colorado River Authority,⁵ Alliant Energy Corporation,⁶ PECO Energy Company,⁷ National Association of

¹ 47 C.F.R. § 1.46.

² NextEra Energy is the parent company of Florida Power & Light Company, which serves approximately 4.9 million customer accounts in Florida and is one of the largest electric utilities in the United States.

³ The Edison Electric Institute is the association that represents all U.S. investor-owned electric companies. EEI's members provide electricity for about 220 million Americans and operate in all 50 states and the District of Columbia.

⁴ Duke Energy is one of the largest electric power holding companies in the United States, supplying and delivering electricity to approximately 7.4 million U.S. customers in the Carolinas, the Midwest, and Florida. Duke Energy has natural gas distribution services serving more than 1.5 million customers in Ohio, Kentucky, Tennessee, and the Carolinas.

⁵ The LCRA is a Texas conservation and reclamation district that provides many vital services, including delivering electricity, managing the water supply and environment of the lower Colorado River basin, providing public recreation areas, and supporting community development. LCRA supplies wholesale

Water Companies,⁸ the Utilities Technology Council,⁹ and Harris Corporation.¹⁰ The Notice of Inquiry (“*NOR*”)¹¹ set due dates of September 18, 2017 and October 18, 2017, respectively, for initial and reply comments. The Petitioners seek an extension until October 2, 2017, to file initial comments and until November 1, 2017, to file reply comments.

As the Commission is aware,¹² recent forecasts project Hurricane Irma, one of the strongest storms ever recorded in the Atlantic Ocean, to make landfall in Florida this coming

electricity to 34 Texas retail utilities that serve more than 1 million people in 55 counties. LCRA is a steward of the Colorado River and provides water for more than one million people, businesses, and industries in the lower Colorado River basin in Texas. LCRA operates six dams on the Colorado River that create the Highland Lakes and, through these dams, manages floodwater and produces hydroelectric power. LCRA manages over 30 parks, recreation areas and natural resource areas. LCRA's affiliate, LCRA Transmission Services Corporation, owns or operates about 5,200 miles of transmission lines and owns, operates, or provides services at nearly 400 substations.

⁶ Alliant Energy Corporation, headquartered in Madison, Wis., provides regulated electric and natural gas service to 960,000 electric and 410,000 natural gas customers across Iowa and Wisconsin.

⁷ PECO, formerly Philadelphia Electric Company, is one of the oldest and largest utility companies in the country. PECO is a subsidiary of Exelon Corporation, an energy holding corporation. Exelon's companies deliver electricity and natural gas to approximately 10 million customers. PECO serves approximately 1.6 million electric customers and more than 511,000 natural gas customers in southeastern Pennsylvania.

⁸ The National Association of Water Companies (NAWC) represents the private water utilities across the country that deliver vital services to approximately one in four Americans every day. NAWC member companies range from small businesses that provide water and wastewater services to as few as 100 customers to the largest water utility in the country that serves 16 million Americans every day.

⁹ The Utilities Technology Council (UTC) is the international association for the telecommunications and information technology interests of electric, gas and water utilities and other critical infrastructure industries (CII).

¹⁰ Harris Corporation is a leading technology innovator, solving customers' toughest mission-critical challenges by providing solutions that connect, inform and protect. Harris supports government and commercial customers in more than 100 countries and has approximately \$6 billion in annual revenue.

¹¹ *Review of the Commission's Rules Governing the 896-901/935-940 MHz Band*, Notice of Inquiry, WT Docket No. 17-200, FCC 17-108 (rel. Aug. 4, 2017) (“*NOR*”).

¹² *See The Public Safety and Homeland Security Bureau, in Coordination with Multiple Other Bureaus, Issues Procedures to Provide Emergency Communications in Areas Affected by Hurricane Irma*, Public Notice, DA 17-846 (rel. Sept. 5, 2017); *Federal Communications Commission Provides 24/7 Emergency Contact Information for Hurricane Irma*, Public Notice, DA 17-845 (rel. Sept. 5, 2017).

weekend and to continue to impact the Southeast U.S. into next week. The Petitioners have been active participants in the Commission's previous docket considering changes to the 900 MHz band and intend to file in this proceeding.¹³ The Petitioners also represent utility companies that operate in the region that will be significantly affected by Hurricane Irma.¹⁴ In addition, other signatories are continuing to address the catastrophic impacts of Hurricane Harvey across large areas of Texas and Louisiana. Because the same subject matter experts involved in this proceeding are actively preparing for Hurricane Irma or engaged in restoration efforts in the aftermath of Hurricane Harvey, certain Petitioners anticipate the need to focus their efforts on service maintenance and restoration into next week and beyond. For these reasons, Petitioners respectfully request a two-week extension of the filing deadlines.

Respectfully submitted,

By: _____/s/_____

Aryeh B. Fishman
Associate General Counsel, Regulatory Legal
Affairs
Edison Electric Institute
701 Pennsylvania Avenue, NW
Washington, D.C. 20004
afishman@eei.org

By: _____/s/_____

William P. Cox
Florida Power & Light Co.
700 Universe Boulevard
Juno Beach, Florida 33408
Will.P.Cox@fpl.com
Counsel for NextEra Energy, Inc.

¹³ See Docket RM-11738.

¹⁴ The map of existing B/ILT sites in the 900 MHz band depicts a high concentration of deployments in Hurricane Irma's projected path in Florida and the Southeast U.S. See *NOI* at ¶ 7.

By: _____/s/_____

Tom Oney
General Counsel
Lower Colorado River Authority
3700 Lake Austin Blvd.
Austin, TX 78703
Tom.oney@LCRA.org

By: _____/s/_____

William R. Godwin, MSEE, RCDD
Duke Energy Corporation
P.O. Box 1008
Charlotte, NC 28201
Bill.Godwin@duke-energy.com

By: _____/s/_____

Brett Kilbourne
Vice President Policy and General Counsel
Utilities Technology Council
1129 20th Street NW, Suite 350
Washington, DC 20036
brett.kilbourne@utc.org

By: _____/s/_____

Lissa Koop
Senior Attorney
Alliant Energy
4902 N. Biltmore Ln.
Madison, WI 53718
lissakoop@alliantenergy.com

By: _____/s/_____

James M. Potter
Strategic Sales Executive
Communication Systems/Harris Corporation
Atlanta, GA

By: _____/s/_____

M. Douglas McGinnis
Senior Manager Network Engineering
PECO Energy Company
2301 Market Street
Philadelphia, PA 19103

By: _____/s/_____

Grace D. Soderberg, Esq.
Director of State Regulatory Relations
National Association of Water Companies
2001 L Street, NW, Suite 850
Washington, DC 20036
grace@nawc.com

September 8, 2017