



July 13, 2020

VIA EMAIL: bulkpowersystemEO@hq.doe.gov

Dear Sir/Madam:

The American Public Power Association (APPA), National Rural Electric Cooperative Association (NRECA), Edison Electric Institute (EEI), Large Public Power Council (LPPC), Utilities Technology Council (UTC), American Petroleum Institute (API), Electricity Consumers Resource Council (ELCON), and the Electric Power Supply Association (EPSA) respectfully request an extension of the deadline to submit comments in response to the Request for Information (RFI) Related to Executive Order 13920, "Securing the United States Bulk-Power System," published in the Federal Register on July 8, 2020, by the Department of Energy (DOE), Office of Electricity. Comments are currently due on August 7, 2020.

Our associations represent all facets of the electric utility industry, and significant elements of the oil and natural gas industries. Our members take seriously the security of the electric grid and energy supply and are keenly aware of its criticality to the health, safety, and security of the nation. We appreciate DOE's work in ensuring the security of the nation's electric grid and energy supply and we value our partnership with DOE in this endeavor. As such, we appreciate the thoughtful questions in DOE's RFI and our intention is to provide thoroughly researched, complete and thoughtful responses. However, considering the complexity and breadth of the data requested by the RFI, a 30-day comment period is not sufficient to provide the level of research that would support fully informed responses. Further, economic and other analysis identified in several comment categories may need to be undertaken to ensure a comprehensive response to the notice and it is unlikely that such analyses can be completed by the current August 7 deadline.

For these reasons, we respectfully request a 60-day comment period, with comments due on September 7, 2020. This brief delay will allow our members to provide more thorough and thoughtful comments in response to the RFI.

If you have questions about this request for an extension of the comment deadline, please direct them to Amy Thomas at APPA (athomas@publicpower.org; 202-467-2934).

Sincerely,

American Public Power Association
National Rural Electric Cooperative Association

Edison Electric Institute
Large Public Power Council
Utilities Technology Council
American Petroleum Institute
Electricity Consumers Resource Council
Electric Power Supply Association