

EXPEDITED CONSIDERATION REQUESTED

address additional issues “such as the most appropriate way to integrate the three models into the cost-of-capital calculation, including the particular weighting that each model should have.” NPRM at 8. These issues are complex, will require expert testimony, and will take time to analyze. Extending the procedural schedule will facilitate the parties’ evaluation of the NPRM and the issues raised therein.

For the foregoing reasons, the AAR respectfully requests an extension of the deadline to file opening comments to December 5, 2019, and reply comments to January 10, 2020. The AAR requests expedited consideration because opening comments are currently due in less than four weeks.

Respectfully submitted,

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