

August 1, 2014

Vincent McGonagle, Director  
Division of Market Oversight  
Gary Barnett, Director  
Division of Swap Dealer and Intermediary Oversight  
Ananda Radhakrishnan, Director  
Division of Clearing and Risk  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, NW  
Washington, DC 20581

**Re: Request for Extension of No-Action Relief (CFTC Letter No. 14-18)**

Dear Directors:

Southwest Power Pool, Inc. ("SPP") respectfully requests that the Commission's Divisions of Market Oversight, Swap Dealer and Intermediary Oversight, and Clearing and Risk (collectively, the "Divisions") extend the duration of the No-Action position announced in the Divisions' Letter No. 14-18, dated February 20, 2014 ("No-Action Letter").

On October 1, 2013, SPP applied to the Commission for an exemptive order under Section 4(c)(6) of the CEA and pursuant to Section 712(f)(4) of the Dodd-Frank Act ("Exemption Application"). On October 7, 2013, SPP requested No-Action Relief pending the Commission's final action on SPP's Application. Page 4 of the No-Action Letter SPP subsequently received stated the relief discussed therein would expire "on the earlier of August 31, 2014, or the date on which the Commission takes final action on the Exemption Application (the "Termination Date")."

Today, SPP is filing an amended and updated Exemption Application ("Amended Application"). During the Divisions' consideration of the Amended Application, SPP requests that the Termination Date and the relief described in the No-Action Letter be extended until the Commission takes final action on the Amended Application.

Please do not hesitate to contact the undersigned at (501) 614-3368 should you need any additional information.

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Respectfully submitted,

/s/ Joseph W. Ghormley

Joseph W. Ghormley, Senior Attorney

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Laura Astrada, Esq.  
Robert Wasserman, Esq.

INFORMATION, CERTIFICATION, AND UNDERTAKING PROVIDED UNDER  
THE COMMISSION'S REGULATIONS, 17 C.F.R. § 140.99

I hereby certify that the material facts set forth in this letter dated August 1, 2014,  
are true and complete to the best of my knowledge.

/s/ Joseph W. Ghormley

Joseph W. Ghormley, Senior Attorney