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

WESTERN ELECTRICITY) **Docket Nos. RM09-9-000**
COORDINATING COUNCIL) **RM09-14-000**

**FILING OF THE NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION IN SUPPORT OF JUNE 20, 2011 COMPLIANCE FILING
OF THE WESTERN ELECTRICITY COORDINATING COUNCIL
IN RESPONSE TO ORDER NUMBERS 751 AND 752
ON VERSION ONE REGIONAL RELIABILITY STANDARDS**

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July 21, 2011

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I. INTRODUCTION

The North American Electric Reliability Corporation (“NERC”)¹ submits this filing in support of the Compliance Filing of the Western Electricity Coordinating Council (“WECC”) in Response to Order Numbers 751 and 752 on Version One Regional Reliability Standards² that was submitted to the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) on June 20, 2011 (“June 20 Filing”).

By this filing, NERC expresses its support for the revisions to Violation Risk Factors (“VRF”) and Violations Severity Levels (“VSL”) contained in the June 20 Filing made by WECC and requests that the Commission approve the revisions as proposed.

¹ The Federal Energy Regulatory Commission (“FERC” or “Commission”) certified NERC as the electric reliability organization (“ERO”) in its order issued on July 20, 2006 in Docket No. RR06-1-000. *North American Reliability Corporation*, “Order Certifying North American Electric Reliability Corporation as the Electric Reliability Organization and Ordering Compliance Filing,” 116 FERC ¶ 61,062 (July 20, 2006).

² *Compliance Filing of the Western Electricity Coordinating Council in Response to Order Numbers 751 and 752 on Version One Regional Reliability Standards*, Docket Nos. RM09-9-000 and RM09-14-000 (June 20, 2011).

II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to:

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*Persons to be included on the Commission's service list are indicated with an asterisk. NERC requests waiver of the Commission's rules and regulations to permit the inclusion of more than two people on the service list.

III. DISCUSSION

On April 21, 2011, FERC issued Order No. 751 addressing Version One Regional Reliability Standards for Facilities Design, Connections, and Maintenance; Protection and Control; and Voltage and Reactive. This Final Rule approved four revised regional Reliability Standards developed by WECC and approved by NERC. These standards are FAC-501-WECC-1 – Transmission Maintenance, PRC-004-WECC-1 – Protection System and Remedial Action Scheme Misoperation, VAR-002-WECC-1 – Automatic Voltage Regulators, and VAR-501-WECC-1 – Power System Stabilizer. Order No. 751 also directed WECC to submit revisions or explanations for certain VRFs and VSLs associated with the approved WECC Regional Reliability Standards within sixty (60) days of the issuance of the Final Rule.

On April 21, 2011, FERC also issued Order No. 752 addressing Version One Regional Reliability Standard for Transmission Operations in which it approved regional Reliability Standard TOP-007-WECC-1 - System Operating Limits developed by WECC and approved by NERC. In Order No. 752, FERC directed WECC to modify certain VRFs and VSLs associated with the approved WECC Regional Reliability Standard, and directed WECC to file the modifications within one-hundred twenty (120) days of the issuance of the Final Rule.

On June 20, 2011, WECC submitted a compliance filing in response to both Order Nos. 751 and 752. This filing included revisions to the VSLs associated with FAC-501-WECC-1, PRC-004-WECC-1, VAR-002-WECC-1, and VAR-501-WECC-1 as directed in Order No. 751 and revisions to the VRFs and VSLs associated with TOP-007-WECC-1 as directed in Order No. 752.

Due to the filing deadline, WECC submitted its June 20 Filing to FERC before the NERC Board of Trustees (“BOT”) acted on the revised VSLs for FAC-501-WECC-1, PRC-004-WECC-1, VAR-002-WECC-1, VAR-501-WECC-1, and the revised VRFs and VSLs for TOP-007-WECC-1. The NERC BOT approved the revised VRFs and VSLs on July 14, 2011 through an Action Without a Meeting. Because WECC has already submitted clean and redlined versions of the changes to the VRFs and VSLs in its June 20 Filing, NERC is not submitting exhibits of the changes with this filing.

NERC supports WECC’s proposed revisions to the VRFs and VSLs included in WECC’s June 20 Filing and requests that FERC approve them as filed.

IV. CONCLUSION

NERC respectfully requests that the Commission approve the revised VRFs and VSLs in the June 20 WECC filing as mandatory and enforceable.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 21st day of July, 2011.

/s/ Holly A. Hawkins
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