



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

January 26, 2011

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Re: WestConnect Utilities' Request for Extension of Compliance Date and Request for Expedited Consideration Filed in FERC Docket No. RM08-19-000


Dear Secretary Bose:

NERC is filing this letter to bring to the Commission's attention language from a Commission Order that may affect the disposition of the pleadings filed in the above-captioned docket. On November 24, 2009, FERC issued an Order approving NERC's Modeling, Data and Analysis ("MOD") Reliability Standards that set the implementation date for compliance with the MOD standards of April 1, 2011.¹ On December 30, 2010, the WestConnect Utilities filed a motion requesting an eighteen-month extension of time to become compliant with the MOD Reliability Standards approved by the Commission in Order No. 729.

Paragraph 95 of Order No. 729 states:

95. As approved, the Reliability Standards shall become effective on the first day of the first calendar quarter that is twelve months beyond the date that the Reliability Standards are approved by all applicable regulatory authorities. The Commission finds that the approved implementation schedule strikes a reasonable balance between the need for timely reform and the needs of transmission service providers and transmission operators to make adjustments to their calculations of available transfer capability, capacity benefit margin and transfer reliability margin. To the extent necessary, we clarify that, under this plan, the Reliability Standards shall become effective on the first day of the first quarter occurring 365 days after approval by all applicable regulatory authorities. Approval by the Commission will be effective 60 days after the date of publication of this Final Rule in the Federal Register. If a transmission service provider or transmission operator is unable to implement these Reliability Standards within the time allowed, requests for extension should be considered through NERC's enforcement and compliance program.

¹ *Mandatory Reliability Standards for the Calculation of Available Transfer Capability, Capacity Benefit Margins, Transmission Reliability Margins, Total Transfer Capability, and Existing Transmission Commitments and Mandatory Reliability Standards for the Bulk-Power System*, 129 FERC ¶61,155 (November 24, 2009).



NERC requests that you bring this letter to the attention of the Commission and staff working on this matter, and that you include this letter in the record for this docket.

Should you have any questions, please contact me at (202) 393-3998 or at holly.hawkins@nerc.net.

Respectfully submitted,

/s/ Holly A. Hawkins
Holly A. Hawkins
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