



Edison Electric
INSTITUTE

Power by Association

**NERC 2021 Draft Business Plan and Budget
Initial Comments of the Edison Electric Institute
June 26, 2020**

The Edison Electric Institute (“EEI”) appreciates the opportunity to provide comments on the first draft of NERC’s 2021 Business Plan and Budget (“Budget”). With the continued financial pressure on the energy sector because of decreasing load and an increase in customers payment defaults resulting from the effects of COVID-19, EEI recognizes NERC’s efforts to maintain a flat budget while also maintaining effective and efficient operations to assure reliability and security of the Bulk Power System (BPS).

With the continued effects of COVID-19 on the electric industry and its customers, EEI urges NERC to work with the Regions by sharing its judicious budgeting approach in an effort to balance reliability and security of the BPS while maintaining current 2020 budget levels in Regional Budgets for 2021.

As NERC and the Regions continue to implement new tools and processes over the next year to bring efficiencies to the ERO Enterprise, including the Reliability and Security Technical Committee and Align, EEI encourages NERC to identify ways to leverage the tools and processes into savings to stakeholders and to continue looking for opportunities to prioritize activities that focus on the highest risk to security and reliability while deferring certain lower risk projects to efficiently manage resources.

EEI appreciates NERC’s consideration of these comments.