

August 25, 2021

**VIA ELECTRONIC FILING**

Mr. Neil Cunningham  
Director of Climate Change and Energy Branch  
Department of Sustainable Development  
1200-155 Carlton Street  
Winnipeg MB R3C 3H8

RE: *North American Electric Reliability Corporation*

Dear Mr. Cunningham:

The North American Electric Reliability Corporation (“NERC”) hereby submits Notice of Filing of the North American Electric Reliability Corporation of Amendments to the Midwest Reliability Organization Regional Reliability Standards Process Manual. NERC requests, to the extent necessary, a waiver of any applicable filing requirements with respect to this filing.

Please contact the undersigned if you have any questions concerning this filing.

Sincerely,

/s/ Lauren Perotti

Lauren Perotti  
*Senior Counsel for the North American Electric  
Reliability Corporation*

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**BEFORE THE  
PROVINCE OF MANITOBA**

**NORTH AMERICAN ELECTRIC )  
RELIABILITY CORPORATION )**

**NOTICE OF FILING OF THE  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION OF  
AMENDMENTS TO THE MIDWEST RELIABILITY ORGANIZATION  
REGIONAL RELIABILITY STANDARDS PROCESS MANUAL**

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August 25, 2021

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ATTACHMENT 2: Amended Midwest Reliability Organization Regional Reliability Standards Processes Manual – Redline

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AMENDMENTS TO THE MIDWEST RELIABILITY ORGANIZATION  
REGIONAL RELIABILITY STANDARDS PROCESS MANUAL**

The North American Electric Reliability Corporation (“NERC”) hereby submits the revised Midwest Reliability Organization (“MRO”) Regional Reliability Standards Process Manual (“RSPM”).<sup>1</sup>

As described in greater detail in Section II of this filing, MRO made several non-material revisions to its RSPM, including updating the title of the committee responsible for standards process oversight at MRO and removing outdated references. The MRO RSPM continues to meet the criteria for regional standards procedures specified in Section 311 of the NERC Rules of Procedure in that it is open, inclusive, balanced, transparent, and provides for due process.<sup>2</sup>

**Attachments 1 and 2** to this filing are clean and redlined versions, respectively, of the proposed revised MRO RSPM.

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<sup>1</sup> Unless otherwise designated, all capitalized terms shall have the meaning set forth in Appendix 2 to the NERC Rules of Procedure, *Definitions Used in the NERC Rules of Procedure*, <https://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>. Regional Entity standard development procedures are no longer maintained as an exhibit to the Regional Delegation Agreements. NERC maintains an up-to-date copy of each Regional Entity’s standard development procedure on its website at: <http://www.nerc.com/AboutNERC/Pages/Regional-Entity-Delegation-Agreements.aspx>.

<sup>2</sup> See NERC Rules of Procedure Section 311.3, Evaluation of Regional Reliability Standards Development Procedure, <https://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>.

## **I. NOTICES AND COMMUNICATIONS**

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

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## **II. PROPOSED MRO RSPM**

The currently effective version of the MRO RSPM was submitted on March 9, 2016.<sup>3</sup> Section VII of the MRO RSPM provides that the RSPM will be reviewed for possible revision at least once every five years from the effective date or when it was reviewed last, whichever is the later. Consistent with this provision, MRO reviewed its RSPM in 2021.

No material changes were made to the MRO RSPM during the five-year review. Non-material changes included the following. First, MRO replaced references to the MRO Standards Committee (“SC”) with MRO Compliance Monitoring and Enforcement Advisory Council (“CMEPAC”), the current name of the body responsible for standards process oversight at MRO. Second, MRO removed references to the Florida Reliability Coordinating Council and Southwest Power Pool Regional Entity, which are no longer Regional Entities. Third, and lastly, MRO removed references to reliability functions that are not monitored by Compliance Enforcement Authorities. This includes removal of references to the Interchange Authority, Load-Serving Entity, and Purchasing-Selling Entity functional entities, entities that are no longer registered with

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<sup>3</sup> *Notice of Filing of the North American Electric Reliability Corporation of Amendments to the Midwest Reliability Organization Regional Reliability Standards Process Manual*, (March 9, 2016).

NERC as a result of the NERC's Risk-Based Registration Initiative.<sup>4</sup> Additionally, references to the Market Operator were also removed, as this function is not included in the NERC compliance registry.

These minor, non-substantive changes appear in redline in **Attachment 2** of this filing.

### **III. MRO AND NERC APPROVALS FOR PROPOSED AMENDMENTS**

In accordance with Section VII of the MRO RSPM, MRO invoked the Abbreviated Process for Procedural/Administrative Changes process in the current version of the MRO RSPM, based on the fact that no substantive changes were made to the MRO RSPM. The proposed revisions to the MRO RSPM were provided to the MRO CMEPAC for a 30-day comment period from November 20, 2020 through December 2, 2020. The MRO CMEPAC approved the revised MRO RSPM on March 12, 2021. The revised MRO RSPM was provided to the MRO Board of Directors on March 11, 2021 and approved by the MRO Board of Directors on March 25, 2021.

In accordance with Section 311 of the NERC Rules of Procedure, the MRO RSPM was posted on the NERC website for a 45-day public comment period from April 21, 2021 through June 4, 2021. There were four sets of responses received, all indicating that the MRO RSPM continues to meet the criteria to be open, inclusive, balanced, and transparent and to provide for due process. The NERC Board of Trustees approved the amendments to the MRO RSPM at its August 12, 2021 meeting.

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<sup>4</sup> See *Notice of Filing of the North American Electric Reliability Corporation of Risk-Based Registration Initiative Rules of Procedure Revisions*, (Jan. 6, 2015). (notice of the removal of the Purchasing-Selling Entity and Interchange Authority functional categories from the NERC registry criteria); *Notice of Filing of the North American Electric Reliability Corporation of Revision to NERC Compliance Registry and Rules of Procedure*, (July 29, 2015) (notice of the removal of the Load-Serving Entity functional category).

Respectfully submitted,

/s/ Lauren Perotti

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Date: August 25, 2021

**ATTACHMENTS 1 and 2**