

March 9, 2016

VIA OVERNIGHT MAIL

Sheri Young, Secretary of the Board
National Energy Board
517 – 10th Avenue SW
Calgary, Alberta
T2R 0A8

Re: Notice of Filing of the North American Electric Reliability Corporation of Amendments to the Midwest Reliability Organization Regional Reliability Standards Process Manual

Dear Ms. Young:

The North American Electric Reliability Corporation (“NERC”) hereby submits the “Notice of Filing of the North American Electric Reliability Corporation of Amendments to the Midwest Reliability Organization Regional Reliability Standards Process Manual.”

The Midwest Reliability Organization (“MRO”) has completed a revision to its Regional Reliability Standards Process Manual (“SPM”) which has been approved by the NERC Board of Trustees. The amendments to the SPM include: (1) minor typographical and grammatical changes; (2) language to reflect that MRO is a cross-border Regional Entity; and (3) elimination of the Reliability Standards Voting Process as the specific system that MRO would use for balloting purposes under the SPM.

The amendments to the MRO SPM do not affect MRO’s Regional Entity functions, and there are no reliability-related issues raised by such amendments.

**3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com**

This filing consists of: (1) this transmittal letter, (2) the narrative text of the filing that follows this transmittal letter, and (3) Attachments 1 and 2 to the filing that contain a clean version and a redline version of the proposed amendments to the MRO SPM, respectively.

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

Respectfully submitted,

/s/ Holly A. Hawkins

Holly A. Hawkins

Associate General Counsel

North American Electric Reliability
Corporation

1325 G Street, N.W., Suite 600

Washington, D.C. 20005

(202) 400-3000

(202) 644-8099 – facsimile

holly.hawkins@nerc.net

**BEFORE THE
NATIONAL ENERGY BOARD**

**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**

Gerald W. Cauley
President and Chief Executive Officer
North American Electric Reliability Corporation
3353 Peachtree Road N.E.
Suite 600, North Tower
Atlanta, G.A. 30326
(404) 446-2560
(404) 446-2595 – facsimile

Charles A. Berardesco
Senior Vice President and General Counsel
Holly A. Hawkins
Associate General Counsel
North American Electric Reliability
Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099 – facsimile
charles.berardesco@nerc.net
holly.hawkins@nerc.net

*Counsel for North American Electric
Reliability Corporation*

March 9, 2016

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ATTACHMENTS

ATTACHMENT 1: Amended Midwest Reliability Organization Regional Reliability Standards
Process Manual — Clean version

ATTACHMENT 2: Amended Midwest Reliability Organization Regional Reliability Standards
Process Manual — Redlined version

I. INTRODUCTION

The North American Electric Reliability Corporation (“NERC”) hereby provides notice of proposed amendments to the Midwest Reliability Organization (“MRO”) Regional Reliability Standards Process Manual (“SPM”).

As described in greater detail in Section III of this filing, the MRO SPM amendments include amendments to the following sections: Sections I, II, III, IV, V, VI, and VII; Appendix B; Appendix D; and Appendix E. These amendments revise the MRO SPM to: (1) address minor typographical and grammatical changes; (2) amend language to reflect that MRO is a cross-border Regional Entity; and (3) eliminate the reference to the Reliability Standards Voting Process as the specific system that MRO would use for balloting purposes under the SPM.

The instant amendments to the MRO SPM do not affect MRO’s Regional Entity functions. The NERC Board of Trustees approved the amendments to Sections I, II, III, IV, V, VI, and VII; Appendix B; Appendix D; and Appendix E at its February 11, 2016 Board Meeting.

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

II. NOTICES AND COMMUNICATIONS

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

Gerald W. Cauley
President and Chief Executive Officer
North American Electric Reliability Corporation
3353 Peachtree Road N.E.
Suite 600, North Tower
Atlanta, G.A. 30326
(404) 446-2560
(404) 446-2595 – facsimile

Charles A. Berardesco
Senior Vice President and General Counsel
Holly A. Hawkins
Associate General Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099 – facsimile
charles.berardesco@nerc.net
holly.hawkins@nerc.net

III. PROPOSED AMENDMENTS TO THE MIDWEST RELIABILITY

ORGANIZATION REGIONAL RELIABILITY STANDARDS PROCESS MANUAL

The proposed amendments revise the MRO SPM to: (1) include minor typographical and grammatical changes; (2) amend language to reflect that MRO is a Cross-Border Regional Entity; and (3) eliminate the reference to the Reliability Standards Voting Process as the specific system that MRO would use for balloting purposes under the MRO SPM. The principle purpose of the amendments is to reduce MRO's total costs by allowing more flexibility in the forum used for voting procedures.

In addition, the proposed amendments include non-material, typographical and grammatical changes, such as the addition of spaces and commas, which are reflected in the redlined MRO SPM included in **Attachment 2** to this filing. The following paragraphs describe the proposed material amendments to the MRO SPM:

1. Section I. Introduction

a. Subsection Purpose

- i. **Replaced** “plans to become” from the second sentence of this Section with “is”. The second sentence now reads, “MRO is a Cross-Border Regional Entity....”

b. Subsection Credits

- i. **Changed** the hyperlink of “www.nerc.com” from <http://www.nerc.com/committees/sac.html> to <http://www.nerc.com/comm/SC/Pages/default.aspx>.

2. Section IV. MRO Regional Reliability Standards Consensus Development Process

a. Subsection Step 1 - Request to Develop a Standard, Revise Existing Standard or withdraw a Standard

- i. **Deleted** “through the Reliability Standards Voting Process (RSVP) application” from the fourteenth sentence. The fourteenth sentence now reads, “The requester shall submit the SAR to the SPM electronically and the SPM shall electronically acknowledge receipt of the SAR within 15 days.”

b. Subsection Step 2 – Solicit Public Comments on the SAR

- i. **Deleted** “on the RSVP application” from the third sentence. The third sentence now reads, “Once a SAR has been accepted by the SC as a candidate for the development of a new or revised standard, the SPM shall post the SAR for the purpose of soliciting public comments.” Also **deleted** “using the RSVP Application” from the sixth sentence. The sixth sentence now reads, “Comments will be accepted on-line.”

- ii. **Added** the missing letter “r” to the word “requester” in the ninth sentence.

c. Subsection Step 4 – Formation of the SDT

- i. **Deleted** “utilizing the RSVP application” from the third sentence. The third sentence now reads, “For each new SAR, the SPM shall post a request that interested parties complete a ‘SDT Self-Nomination’ form.” Also **deleted** “through the RSVP” in the fourth sentence. The fourth sentence now reads, “Those individuals who complete and submit these self-nomination forms will be considered for appointment to the associated SDT.”

d. Subsection Step 6 – Solicit Public Comments on Draft Standard

- i. **Deleted** “using the RSVP application” from the eighth sentence. The eighth sentence now reads, “Comments will be accepted on-line and will be viewable during the posted commenting period.” Also **deleted** “using the RSVP application” from the fourteenth sentence. The fourteenth sentence now reads, “...after the SDT has posted its consideration of comments and conforming changes to the associated standard.”

e. Subsection Step 9 – Ballot the New Revised or Withdrawal of Standard

- i. **Deleted** “and” from the third sentence, between “...the standard,” and “all comments...” Also **deleted** “through the RSVP application” from the seventh sentence. The seventh sentence now reads, “The ballot will be conducted electronically.” Also **deleted** “through RSVP” from the eighth sentence. The eighth sentence now reads, “In the event of balloting difficulties with electronic balloting, the SC will address the issues...”
- ii. **Added** “is” in the seventeenth sentence, between “...as soon as” and “practical...”
- iii. **Added** a space in the eighteenth sentence, to change the single word “maybe” to two words, “may be”.

f. Subsection Step 10 – Board of Director (BOD) Approval of a Proposed MRO Regional Reliability Standard

- i. **Changed** “(30)-day” to “(30)-days” in the third sentence.

3. *Section V. Interpretations and Appeals*

a. Subsection Level 2 Appeal

- i. **Changed** “members” to “members” and **moved** a comma in the second sentence. Also **changed** “days” to “day” in the fourth sentence.

4. *Section VII. Maintenance of MRO Regional Reliability Standards Process*

a. Subsection On-line Standards Information System

- i. **Added** “of” in the third sentence between “...at a minimum” and “the previous five years...”

- b. Subsection Numbering System
 - i. **Replaced** “on the RSVP system” with “electronically” in the third sentence. The third sentence now reads, “The SPM will notify the MRO region and post the informational electronically prior to making the change.”
 - c. Subsection Supporting Documents
 - i. **Added** “or” to replace the comma in the sentence for the description of “Standard Reference” document type, within the table of documents, between “Descriptive” and “explanatory information...”
 - ii. **Changed** “indentifies” to “identifies” to the “Guideline” document type description, within the same table.
5. *Appendix B – Information in a Standard Authorization Request*
- a. Subsection Reliability Functions
 - i. **Deleted** “and” from the sentence describing the function “Balancing Authority”, between “...ahead of time” and “maintains...”
6. *Appendix D – Registered Ballot Body (RBB) Registration Procedures*
- i. **Deleted** “via the RSVP application (<http://rsvp.midwestreliability.org>)” from the tenth sentence. The tenth sentence now reads, “All registrations must be done electronically.”
 - b. Subsection Segment Qualification Guidelines
 - i. **Changed** “days notice” to “days’ notice” in the sixth sentence.
 - ii. **Replaced** “on the RSVP” with “electronically” in the ninth sentence. The ninth sentence now reads, “These circumstances will be approved by the SC and posted electronically.”

IV. MRO AND NERC APPROVALS FOR THE PROPOSED AMENDMENTS

The MRO SPM was posted on the MRO website for regional ballot body comments from July 16 through August 15, 2015. On December 10, 2015, the MRO Board of Directors approved the proposed amendments to the SPM.

The MRO SPM was posted on the NERC website for industry stakeholder comment from November 5 through December 21, 2015. The NERC Board of Trustees approved the amendments to the MRO SPM at its February 11, 2016 Board meeting.

Respectfully submitted,

/s/ Holly A. Hawkins

Charles A. Berardesco
Senior Vice President and General Counsel
Holly A. Hawkins
Associate General Counsel
North American Electric Reliability
Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
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holly.hawkins@nerc.net

*Counsel for North American Electric
Reliability Corporation*

Dated: March 9, 2016

ATTACHMENTS 1 – 2

(Available on the NERC Website at

http://www.nerc.com/FilingsOrders/ca/Canadian%20Filings%20and%20Orders%20DL/Attach_MRO_SPM_Amend_2016.pdf)