
**BEFORE THE
RÉGIE DE L'ÉNERGIE
THE PROVINCE OF QUÉBEC**

**NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION)**

**NOTICE OF FILING OF REVISIONS TO
THE RULES OF PROCEDURE OF
THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION**

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ATTACHMENTS:

Attachments 1A and 1B: Clean and Redlined Versions of the Revised Rules of Procedure, Sections 100 – 1600

Attachment 2: Proposed new Appendix 2 of the Rules of Procedure – *Definitions Used in the Rules of Procedure*

Attachments 3A and 3B: Clean and Redlined Versions of Revised Appendix 3A of the Rules of Procedure – *Standard Processes Manual*

Attachments 4A and 4B: Clean and Redlined Versions of Revised Appendix 3B of the Rules of Procedure – *Procedures for Election of Members of the Standards Committee*

Attachments 5A and 5B: Clean and Redlined Versions of Revised Appendix 3C of the Rules of Procedure – *Procedure for Coordinating Reliability Standards Approvals, Remands, and Directives*

Attachments 6A and 6B: Clean and Redlined Versions of Revised Appendix 3D of the Rules of Procedure – *Registered Ballot Body Criteria*

Attachments 7A and 7B: Clean and Redlined Versions of Revised Appendix 4A of the Rules of Procedure – *Audit of Regional Entity Compliance Programs*

Attachments 8A and 8B: Clean and Redlined Versions of Revised Appendix 4B of the Rules of Procedure – *Sanction Guidelines of the North American Electric Reliability Corporation*

Attachments 9A and 9B: Clean and Redlined Versions of Revised Appendix 4C of the Rules of Procedure – *Compliance Monitoring and Enforcement Program*

Attachments 10A and 10B: Clean and Redlined Versions of Revised Appendix 4D of the Rules of Procedure – *Procedure for Requesting and Receiving Technical Feasibility Exceptions to NERC Critical Infrastructure Protection Standards*

Attachments 11A and 11B: Clean and Redlined Versions of Revised Appendix 4E of the Rules of Procedure – *Compliance and Certification Committee Hearing Procedures, Hearing Procedures for Use in Appeals, and Mediation Procedures*

Attachments 12A and 12B: Clean and Redlined Versions of Revised Appendix 5A of the Rules of Procedure – *Organization Registration and Certification Manual*

Attachments 13A and 13B: Clean and Redlined Versions of Revised Appendix 5B of the Rules of Procedure – *Statement of Compliance Registry Criteria*

Attachments 14A and 14B: Clean and Redlined Versions of Revised Appendix 6 of the Rules of Procedure – *System Operator Certification Program Manual*

Attachments 15A and 15B: Clean and Redlined Versions of Revised Appendix 8 of the Rules of Procedure – *NERC Blackout and Disturbance Response Procedures*

I. INTRODUCTION

The North American Electric Reliability Corporation (“NERC”) hereby provides notice of revisions to NERC’s Rules of Procedure (“ROP”), including revisions to Sections 100 through 1600 of the ROP and Appendices 3A, 3B, 3C, 3D, 4A, 4B, 4C, 4D, 4E, 5A, 5B, 6 and 8, and a new Appendix 2, *Definitions Used in the Rules of Procedure*. The purposes of the proposed revisions are (1) to place all definitions of defined terms used anywhere in the ROP in a single, readily-accessible location (proposed new Appendix 2); (2) to capitalize defined terms throughout the ROP where such terms are intended to be used in their defined meanings; and (3) to lower-case other terms that are currently capitalized in the ROP but are not defined terms.

These revisions are being proposed as a result of P 93 of the Federal Energy Regulatory Commission’s (“FERC”) Order issued October 21, 2010, in Docket No. RR10-11-000, in which FERC invited NERC to submit a filing making consistent use of defined terms throughout the ROP and Appendices.¹ NERC recognized that there is a need for greater consistency in definitions of terms and use of capitalization throughout the ROP and Appendices, as suggested by P 93 of the October 21, 2010 Order. Therefore, in 2011, NERC initiated a project to develop a single, standard set of definitions for the ROP and Appendices and to consistently capitalize defined terms throughout the ROP. The revisions to the ROP and Appendices, including new Appendix 2, being presented in this filing are the result of that effort.

This filing includes the following attachments, comprising clean and redlined versions of the ROP and Appendices incorporating the proposed revisions:

- **Attachments 1A and 1B:** Clean and Redlined Versions of the Revised Rules of Procedure, Sections 100 – 1600

¹ *North American Electric Reliability Corporation*, 133 FERC ¶ 61,061 (2010) (“October 21, 2010 Order”).

- **Attachment 2:** Proposed new Appendix 2 of the Rules of Procedure – *Definitions Used in the Rules of Procedure*
- **Attachments 3A and 3B:** Clean and Redlined Versions of Revised Appendix 3A of the Rules of Procedure – *Standard Processes Manual*
- **Attachments 4A and 4B:** Clean and Redlined Versions of Revised Appendix 3B of the Rules of Procedure – *Procedures for Election of Members of the Standards Committee*
- **Attachments 5A and 5B:** Clean and Redlined Versions of Revised Appendix 3C of the Rules of Procedure – *Procedure for Coordinating Reliability Standards Approvals, Remands, and Directives*
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- **Attachments 7A and 7B:** Clean and Redlined Versions of Revised Appendix 4A of the Rules of Procedure – *Audit of Regional Entity Compliance Programs*
- **Attachments 8A and 8B:** Clean and Redlined Versions of Revised Appendix 4B of the Rules of Procedure – *Sanction Guidelines of the North American Electric Reliability Corporation*
- **Attachments 9A and 9B:** Clean and Redlined Versions of Revised Appendix 4C of the Rules of Procedure – *Compliance Monitoring and Enforcement Program*
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- **Attachments 13A and 13B:** Clean and Redlined Versions of Revised Appendix 5B of the Rules of Procedure – *Statement of Compliance Registry Criteria*
- **Attachments 14A and 14B:** Clean and Redlined Versions of Revised Appendix 6 of the Rules of Procedure – *System Operator Certification Program Manual*
- **Attachments 15A and 15B:** Clean and Redlined Versions of Revised Appendix 8 of the Rules of Procedure – *NERC Blackout and Disturbance Response Procedures*

II. NOTICES AND COMMUNICATIONS

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

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III. BASIS AND PURPOSE OF THE PROPOSED REVISIONS TO THE RULES OF PROCEDURE AND APPENDICES

A. General Approach and Objectives in Developing the Proposed Revisions

The proposed revisions to the ROP presented in this filing were developed in response to P 93 of the October 21, 2010 Order, which suggested that NERC should review and revise its ROP to provide for consistent capitalization of defined terms throughout the ROP², as well as for the purpose of developing a consistent set of defined terms to be used throughout the ROP. Additionally, NERC determined that it would be useful and appropriate to create a new Appendix to the ROP in which all the defined terms used anywhere in the ROP would be collected. That Appendix is new Appendix 2, *Definitions Used in the Rules of Procedure*. Thus, the purposes of the proposed revisions are (1) to place all definitions of defined terms used anywhere in the ROP in a single, readily-accessible location; (2) to capitalize defined terms

² As FERC noted in P 93 of the October 21, 2010 Order, “capitalization of a term suggests that it has a defined meaning.”

throughout the ROP where such terms are intended to be used in their defined meanings; and (3) to lower-case other terms that are currently capitalized in the ROP but are not defined terms.

As stated on page 1 of Appendix 2, the following criteria were used in determining whether or not a term should be capitalized in the ROP:

Where used in the Rules of Procedure, a defined term will be capitalized. Where a term defined in this Appendix appears in the Rules of Procedure but is not capitalized, the term is there being used in its ordinary and commonly understood meaning and not as defined in this Appendix (if different). Other terms that are not defined terms, such as the names of entities, organizations, committees or programs; position titles; titles of documents or forms; section headings; geographic locations; and other terms commonly presented as proper nouns, may also be capitalized in the Rules of Procedure without being defined in this Appendix.

Accordingly, in the proposed revisions to the ROP, defined terms listed in Appendix 2, if not currently capitalized where used in the ROP, have been revised to be capitalized where they are intended to be used with their defined meanings. Correspondingly, terms that are currently capitalized in the ROP but are not defined terms in Appendix 2 and do not meet the other criteria for capitalization described in the passage from Appendix 2 quoted above, have been revised to be lower case.

In developing the proposed revisions, NERC attempted to avoid making any substantive changes to existing definitions of terms used in the ROP and, more generally, to avoid making any substantive changes to the ROP.³ Efforts were made to reconcile non-identical definitions currently used in different parts of the ROP and Appendices. However, for certain terms, the definitions used in different parts of the ROP were sufficiently different (and the different definitions were significant to the respective parts of the ROP and Appendices in which they

³ For this reason, NERC decided to process, and is presenting, this set of proposed revisions to the ROP as a stand-alone package of revisions, rather than combining it with other, substantive proposed revisions to the ROP.

appeared) that it was not possible to develop a single definition without changing the meaning of the term as used in one of the parts of the ROP. In those cases, the definition in Appendix 2 incorporates both meanings, with the applicable meaning to be used being dependent on the context (or, in some cases, to be used only in a specifically-identified ROP section or Appendix⁴). This approach was considered preferable to changing an established term or its definition as used in one provision of the ROP, solely to achieve consistency, in light of the objective to avoid introducing substantive changes in the ROP through this initiative.⁵

A small number of new definitions (*i.e.*, explicit definitions of terms not presently found in the ROP or Appendices or in any other authoritative sources such as §215 of the Federal Power Act (“FPA”), applicable FERC regulations including 18 C.F.R. Part 39, the NERC Bylaws, or the NERC *Glossary of Terms Used in Reliability Standards*) for terms frequently used in the ROP have been created and appear in proposed Appendix 2. In most cases, the new definition, although not explicit in the current ROP, was strongly suggested by the text accompanying the use of the term in the current ROP. These newly-created definitions are identified in the detailed discussion of Appendix 2 in §III.B below.

Although Appendix 2 has been created as a central document in which all defined terms used anywhere in the ROP and Appendices can be found, existing “Definitions” or “Glossary” sections in other Appendices have been preserved. These existing “Definitions” or “Glossary”

⁴ See, *e.g.*, the definitions of the terms Certification, Compliance Monitoring and Enforcement Program, Confidential Information, and Hearing Officer in Appendix 2.

⁵ A number of comments were submitted by stakeholders during the public comment period suggesting that certain definitions of terms should be changed or that other, new definitions should be introduced. For the most part, these suggestions, although some of them warrant further consideration, were not accepted and implemented as part of this initiative because they would have resulted in substantive changes to the ROP, and therefore were viewed as outside the purpose and scope of this initiative. NERC intends to give further consideration to some of these suggestions in connection with other, substantive changes to the ROP.

sections are in Appendices 4C, 4D, 4E, 5B and 6 and Attachment 2 (Hearing Procedures) to Appendix 4C.⁶ The definitions of terms in these “Definitions” and “Glossary” sections have been made consistent with the definitions of the same terms in Appendix 2. (In fact, as shown in greater detail in §III.B below, in a number of instances, the definition of a term in Appendix 2 is taken from the definition of that term in the “Definitions” section of one of the Appendices.) In each of the “Definitions” or “Glossary” sections in the individual Appendices, a statement has been added in substantially the following form: “Capitalized terms used in this [Appendix] shall have the meanings set forth in Appendix 2 of the Rules of Procedure. For convenience of reference, terms frequently used in this Appendix are also set forth below.”⁷

Consideration was given to eliminating all of the individual “Definitions” or “Glossary” sections in individual Appendices and replacing them with a reference to Appendix 2 for definitions of terms used in the Appendix.⁸ However, it was decided that the individual “Definitions” and “Glossary” sections should remain for the convenience of users, *i.e.*, so that users can find the definitions of terms used frequently in an Appendix within that same Appendix document, rather than having to go to a separate document. A number of commenters on the posted revisions stated that retaining the “Definitions” and “Glossary” sections within individual Appendices could result in additional work and potential confusion and inconsistencies because, in the future, if a definition is changed in Appendix 2, it will be necessary to make sure that the definition is also changed in any “Definitions” sections in

⁶ Although the existing “Definitions” and “Glossary” sections in the listed Appendices have been retained for convenience of use, the definitions in §200 of the ROP have been deleted and replaced with a reference to Appendix 2.

⁷ *See, e.g.*, §1.1 of Appendix 4C and §2.0 of Appendix 4D.

⁸ In developing the proposed revisions, NERC considered following this approach, and it was also suggested by a number of commenters during the 45-day comment period.

individual Appendices where it also appears. While these comments have merit, and appropriately focus on the need to maintain consistency in the use of defined terms throughout the ROP, eliminating all of the “Definitions” and “Glossary” sections in individual Appendices would not solve the underlying problem relating to the need to maintain consistency in the use of defined terms throughout the ROP and Appendices. If there were no “Definitions” sections in individual Appendices, nevertheless, whenever a new defined term or a revision to an existing definition is proposed for Appendix 2 (*e.g.*, for purposes of one section of the ROP or one or two Appendices), it would still be necessary to review the entire ROP and Appendices to verify that the new defined term or revised definition does not create inconsistency or ambiguity in, or change the meaning of, another provision elsewhere in the ROP. In other words, whether or not the “Definitions” and “Glossary” sections were eliminated from individual Appendices, a thorough review of the ROP and Appendices for consistency will be necessary each time a new defined term is added to, or an existing definition is revised in, Appendix 2.

B. Proposed Appendix 2, Definitions Used in the Rules of Procedure

Proposed Appendix 2 contains all defined terms used anywhere in the ROP and Appendices. The defined terms in Appendix 2 are taken largely from existing sources, including §215 of the FPA; FERC’s regulations; the NERC Bylaws; the NERC *Glossary of Terms Used in Reliability Standards*; and existing definitions found in the ROP and Appendices, including in particular in §200 and §1500 of the ROP, Appendices 4C, 4D, 4E, 5B and 6, and Attachment 2 (Hearing Procedures) to Appendix 4C. Only a small number of new defined terms have been created, and all of these are existing terms used in the ROP whose definitions were developed based on the context of or text accompanying each term as currently used in the ROP.

In Appendix 2, definitions of terms that are taken from §215 of the FPA or from FERC’s regulations at 18 C.F.R. Part 39 or Part 388 are marked with “plusses” (++), and definitions of terms that are taken from the NERC *Glossary of Terms Used in Reliability Standards* are marked with asterisks (**). To the maximum extent possible, definitions of terms appearing in the *Glossary of Terms Used in Reliability Standards* were used as the definitions of those terms in Appendix 2, as this promotes even greater consistency of terms across relevant NERC documents.

There are a number of defined terms in Appendix 2 that do not appear elsewhere in the ROP. These defined terms are internal to the definitions of other defined terms that do appear elsewhere in the ROP. For the most part, these “internal” definitions are found within definitions of other terms that are taken from the NERC *Glossary of Terms Used in Reliability Standards*, and the “internal” definitions are themselves taken from the NERC *Glossary of Terms Used in Reliability Standards*. These “internal” definitions have been included in Appendix 2 because they are necessary for a complete understanding of the defined terms that are used elsewhere in the ROP; inclusion of the internal definitions in Appendix 2 is consistent with the objective to establish Appendix 2 as a complete source of all definitions used in the ROP, without the need to refer to other sources outside the ROP.

The following table shows the source or derivation of each of the defined terms in Appendix 2.

Sources of Appendix 2 Definitions

Definition	Source
Adjacent Balancing Authority	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Adjusted Penalty Amount	New definition (from Appendix 4B).
Advisories or Level 1 (Advisories)	New definition (from Section 810 of ROP).
Alleged Violation	Appendix 4C.

Annual Audit Plan	Appendix 4C.
Annual Report	Appendix 4D.
Applicable Governmental Authority	Appendix 4C.
Applicable Requirement	Appendix 4D.
Balancing Authority	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Balancing Authority Area	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Base Penalty Amount	New definition (from Appendix 4B).
Blackstart Resource	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Board or Board of Trustees	Section 200 of ROP; NERC Bylaws, Article I.
Board of Trustees Compliance Committee, BOTCC or Compliance Committee	New definition.
Bulk Electric System	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Bulk Power System	Clause 1 –18 C.F.R. Part 39.1; FPA § 215; Section 200 of ROP; Clause 2 – Appendix 4E, Part 1 and Part 2.
Canadian	Section 200 of ROP.
Canadian Entity	Appendix 4D.
Cascading	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
CCC	New definition (acronym for Compliance and Certification Committee).
Certification	Clause 1 - Appendix 4E Part 2; Clause 2 - Appendix 6.
Certification Staff	Appendix 4E Part 2.
Certification Team	New definition (from Appendix 5A).
Classified National Security Information	Appendix 4D.
Clerk	Appendix 4C, Attachment 2 (Hearing Procedures).
Commission	NERC Bylaws, Article I.
Complaint	Appendix 4C.
Compliance and Certification Manager	Appendix 5A.
Compliance Audit	Appendix 4C.
Compliance Audit Participants	Appendix 4C.
Compliance Enforcement Authority	Appendix 4C.
Compliance Enforcement Authority's Area of Responsibility	Appendix 4C, Attachment 2 (Hearing Procedures).
Compliance Investigation	Appendix 4C.
Compliance Monitoring and Enforcement Program or CMEP	Clause 1 – Appendix 4C, Appendix 4D; Clause 2 - New definition.
Compliant Date	Appendix 4D.
Confidential Business and Market Information	Section 1501 of ROP.

Confidential Information	Section 1501 of ROP; Appendix 4D.
Confirmed Violation	Appendix 4C.
Continuing Education Hour or CE Hour	Appendix 6.
Continuing Education Program Provider or Provider	Appendix 6.
Coordinated Functional Registration	Appendix 5A.
Covered Asset	Appendix 4D.
Credential	Appendix 6.
Credential Maintenance	Appendix 6.
Critical Assets	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Critical Cyber Assets	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Critical Energy Infrastructure Information	18 C.F.R. Part 388.113; Section 1501 of ROP; Appendix 4C, Attachment 2 (Hearing Procedures).
Critical Infrastructure	18 C.F.R. Part 388.113; Section 1501 of ROP; Appendix 4C, Attachment 2 (Hearing Procedures).
Critical Infrastructure Protection Standard or CIP Standard	Appendix 4D.
Cross-Border Regional Entity	18 C.F.R. Part 39.1.
Cyber Assets	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Cyber Security Incident	18 C.F.R. Part 39.1; FPA § 215 ; Appendix 4C, Attachment 2 (Hearing Procedures).
Cyber Security Incident Information	Section 1501 of ROP.
Days	Appendix 5A.
Delegate	Appendix 4D.
Director of Compliance	Appendix 4C, Attachment 2 (Hearing Procedures); Appendix 4E, Part 1 and Part 2.
Distribution Provider	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Document	Appendix 4C, Attachment 2 (Hearing Procedures); Appendix 4E Part 1 and Part 2.
Effective Date	Appendix 4D.
Electric Reliability Organization or ERO	18 C.F.R. Part 39.1; FPA § 215; Section 200 of ROP; Appendix 4C, Attachment 2 (Hearing Procedures); Appendix 4E, Part 1 and Part 2.
Element	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Eligible Reviewer	Appendix 4D.
End Date	Appendix 4C.
Essential Actions or Level 3 (Essential Actions)	New definition (from Section 810 of ROP).

Exception Reporting	Appendix 4C.
Expiration Date	Appendix 4D.
Facility	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
FERC	Appendix 4C, Attachment 2 (Hearing Procedures); Appendix 4D; Appendix 4E Part 1 and Part 2.
Final Penalty Amount	New definition (from Appendix 4B).
FOIA	Appendix 4D.
Footprint	Appendix 5A.
Functional Entity	Appendix 5A.
Generator Operator	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Generator Owner	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Hearing Body or Regional Entity Hearing Body	New definition (from Appendix 4C, Attachment 2 (Hearing Procedures)).
Hearing Officer	Clause 1 – Appendix 4C, Attachment 2 (Hearing Procedures); Clause 2 - Appendix 4E Part 1 and Part 2.
Hearing Panel	Appendix 4E Part 1 and Part 2.
Hearing Procedures	Clause 1 - Appendix 4D; Clause 2 – Appendix 4E.
Interchange	NERC <i>Glossary of Terms Used in Reliability Standards</i> .

Interchange Authority	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Interchange Schedule	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Interchange Transaction	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Interconnected Operations Service	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Interconnection	18 C.F.R. Part 39.1; FPA § 215.
Interconnection Reliability Operating Limit	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Interpretation	New definition (from Appendix 3A).
Joint Registration Organization	New definition (from Section 507 of ROP and Appendix 5A).
Lead Mediator	New definition (from Appendix 4E, Part 3).
Load-Serving Entity	NERC <i>Glossary of Terms Used in Reliability Standards</i> ; Appendix 5B.
Mapping	Appendix 5A.
Mediation Settlement Agreement	New definition (from Appendix 4E, Part 3).
Member	NERC Bylaws.
Member Representatives Committee or MRC	New definition (from NERC Bylaws).
Mitigation Plan	Appendix 4C.
NERC-Approved Learning Activity	Appendix 6.
NERC Compliance Monitoring and Enforcement Program Implementation Plan or NERC Implementation Plan	Appendix 4C.
NERC Compliance Registry, Compliance Registry or NCR	Appendix 4C.
NERC Identification Number or NERC ID	Appendix 5A.
NERC Organization Certification or Organization Certification	Appendix 5A.
Net Energy for Load or NEL	NERC Bylaws, Article I; Section 200 of ROP.
Notice of Alleged Violation	Appendix 4C.
Notice of Completion of Enforcement Action	Appendix 4C.
Notice of Confirmed Violation	Appendix 4C.
Notice of Penalty	Appendix 4C.
Notice of Possible Violation	Appendix 4C.
NRC	Appendix 4D.
NRC Safeguards Information	Appendix 4D.
Open Access Transmission Tariff	NERC <i>Glossary of Terms Used in Reliability Standards</i>
Part A Required Information	Appendix 4D.

Part B Required Information	Appendix 4D.
Participant	Appendix 4C, Attachment 2 (Hearing Procedures); Appendix 4E Part 1 and Part 2.
Party or Parties	New definition (from Appendix 4E Part 3).
Penalty	Appendix 4C, Attachment 2 (Hearing Procedures); Appendix 4E Part 1.
Periodic Data Submittals	Appendix 4C.
Person	Appendix 4C, Attachment 2 (Hearing Procedures); Appendix 4E Part 1 and Part 2.
Planning Authority	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Point of Delivery	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Point of Receipt	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Possible Violation	Appendix 4C.
Preliminary Screen	Appendix 4C.
Probation	Appendix 6.
Protected FOIA Information	Appendix 4D.
Protection System	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Purchasing-Selling Entity	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Receiving Entity	New definition (from Section 1502 of ROP).
Recommendations or Level 2 (Recommendations)	New definition (from Section 810 of ROP).
Region	New definition (from NERC Bylaws Article X).
Regional Criteria	Section 200 of ROP.
Regional Entity	18 C.F.R. Part 39.1.
Regional Entity Compliance Monitoring and Enforcement Program Implementation Plan or Regional Implementation Plan	Appendix 4C.
Regional Reliability Standard	Section 200 of ROP.
Registered Ballot Body	New definition (from Appendix 3A).
Registered Entity	Appendix 4C.
Registration or Organization Registration	Appendix 5A.
Reliability Coordinator	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Reliability Coordinator Area	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Reliability Standard	Section 200 of ROP.
Reliability Standards Development Plan	New definition (from Section 310 of ROP).
Reliable Operation	18 C.F.R. Part 39.1; FPA § 215.

Remedial Action Directive	Appendix 4C.
Reporting Entity	New definition (from Section 1600 of ROP).
Requirement	Appendix 3A.
Required Date	Appendix 4C.
Required Information	Appendix 4D.
Reserve Sharing Group	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Resource Planner	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Respondent	Appendix 4C, Attachment 2 (Hearing Procedures); Appendix 4E Part 1 and Part 2.
Responsible Entity	Appendix 4D.
Revoked	Appendix 6.
Revoke for Cause	Appendix 6.
Sector	NERC Bylaws, Article I.
Segment	New definition.
Self-Certification	Appendix 4C.
Self-Reporting	Appendix 4C.
Senior Manager	Appendix 4D.
Sink Balancing Authority	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Source Balancing Authority	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Special Protection System	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Spot Checking	Appendix 4C.
Staff or Compliance Staff	Appendix 4C and Attachment 2 (Hearing Procedures); Appendix 4E Part 1.
Strict Compliance	Appendix 4D.
Submitting Entity	New definition (from Section 1502 of ROP).
Suspended	Appendix 6.
System	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
System Operating Limit	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Technical Advisor	Appendix 4C, Attachment 2 (Hearing Procedures); Appendix 4E Part 1 and Part 2.
Technical Feasibility Exception or TFE	Appendix 4D.
Termination of Credential	Appendix 6.
TFE Request	Appendix 4D.
Transmission Customer	NERC <i>Glossary of Terms Used in Reliability Standards</i> .

Transmission Operator	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Transmission Owner	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Transmission Planner	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Transmission Service	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Transmission Service Provider	NERC <i>Glossary of Terms Used in Reliability Standards</i> .
Type of CE Hours	Appendix 6.
Variance	Section 200 of ROP.
Violation Risk Factor or VRF	New definition (from Appendix 3A and Appendix 4B).
Violation Severity Level or VSL	New definition (from Appendix 3A and Appendix 4B).
Wide Area	NERC <i>Glossary of Terms Used in Reliability Standards</i> .

With respect to the defined terms identified in the above table as “new definitions”:

- The terms “Adjusted Penalty Amount,” “Base Penalty Amount” and “Final Penalty Amount” have been used in Appendix 4B, *Sanction Guidelines*, but without explicit definitions. Given the nature of the use of these terms in Appendix 4B, it was determined to be appropriate to create definitions for these terms, based on the context of their use in Appendix 4B.

“Adjusted Penalty Amount” means the proposed Penalty for a violation of a Reliability Standard as determined based on application of the adjustment factors identified in Section 4.3 of the *Sanction Guidelines* to the Base Penalty Amount.

“Base Penalty Amount” means the proposed Penalty for a violation of a Reliability Standard as initially determined pursuant to Sections 4.1 and 4.2 of the NERC *Sanction Guidelines*, before application of any adjustment factors.

“Final Penalty Amount” means the final, proposed Penalty for violation of a Reliability Standard, determined in accordance with the *Sanction Guidelines*.

- The terms “Board of Trustees Compliance Committee,” “BOTCC” and “Compliance Committee” are used in various places throughout the ROP; it was determined to be

appropriate to define these terms as the Compliance Committee of the NERC Board of Trustees.

- “CCC” is used in the ROP as an acronym for the NERC Compliance and Certification Committee. This acronym was added to Appendix 2 as a definition.
- The term “Certification Team” is used in Appendix 5A to identify the team that conducts Certification reviews of Registered Entities; a definition was added based on the functions of this team.

“Certification Team” means a team assembled by a Regional Entity that will be responsible for performing the activities included in the Certification process for an entity pursuant to Appendix 5A.

- For “Compliance Monitoring and Enforcement Program” or “CMEP,” a second part was added to the definition in order to (depending on the context of use) distinguish “the program, department or organization within NERC or a Regional Entity that is responsible for performing compliance monitoring and enforcement activities with respect to Registered Entities’ compliance with Reliability Standards,” from the CMEP document (Appendix 4C of the ROP).
- The terms “Advisories” or “Level 1 (Advisories)”; “Essential Actions” or “Level 3 (Essential Actions)”; and “Recommendations” or “Level 2 (Recommendations)” are used in §810.3 of the ROP. In light of their usage in the ROP, a definition was added for each of these terms referring to their source in §810 of the ROP.

“Advisories” or “Level 1 (Advisories)” is a notification issued by NERC in accordance with Section 810.3.1 of the Rules of Procedure.

“Essential Actions” or “Level 3 (Essential Actions)” is a notification issued by NERC in accordance with Section 810.3.3 of the Rules of Procedure.

“Recommendations” or “Level 2 (Recommendations)” is a notification issued by NERC in accordance with Section 810.3.2 of the Rules of Procedure.

- “Hearing Body” and “Regional Entity Hearing Body” are terms that are used frequently in Attachment 2 (Hearing Procedures) to Appendix 4C; a definition was added to identify these terms as “the body established by a Regional Entity to conduct hearings pursuant to the Hearing Procedures.”⁹

- “Interpretation” is a term used in §300 of the ROP and Appendix 3A, *Standard Processes Manual*, without an explicit definition. A definition was developed for this term based on the description of an Interpretation in §300 and Appendix 3A.

“Interpretation” means an addendum to a Reliability Standard, developed in accordance with the NERC *Standard Processes Manual* and approved by the Applicable Governmental Authority(ies), that provides additional clarity about one or more Requirements in the Reliability Standard.

- “Joint Registration Organization” is used in §507 of the ROP and elsewhere. A definition was added for Joint Registration Organization based on the description in ROP §507.

“Joint Registration Organization” means an entity that registers in the Compliance Registry to perform reliability functions for itself and on behalf of one or more of its members or related entities for which such members or related entities would otherwise be required to register.

- “Lead Mediator” is a term used in the mediation procedure section of Appendix 4E (Part 3 – CCCPP-006-1), without an explicit definition. A definition was added to identify the Lead Mediator as “a member of a mediation team formed pursuant to Appendix 4E who is selected by the members to coordinate the mediation process and serve as the mediation team’s primary contact with the Parties.”

⁹ In addition, as described in §III.C below, the existing term used in the Hearing Procedures, “[HEARING BODY],” has been changed to “Hearing Body.”

- “Mediation Settlement Agreement” is also a term used in the mediation procedure section of Appendix 4E (Part 3) without an explicit definition. A definition was added to identify “Mediation Settlement Agreement” as “a written agreement entered into by the Parties to a mediation pursuant to Appendix 4E that resolves the dispute.”
- “Member Representatives Committee” or “MRC,” which is a body established pursuant to the NERC Bylaws, is used in the ROP without an explicit definition. A definition was added to identify the “Member Representatives Committee” or “MRC” as “the body established pursuant to Article VIII of the NERC Bylaws.”
- “Party” and “Parties” are used in the mediation procedures section of Appendix 4E (Part 3 – CCCPP-006-1) to identify the participants in a mediation process pursuant to those provisions. A definition was added to identify “Party” or “Parties” as “a Person or the Persons participating in a mediation pursuant to Appendix 4E.”
- The terms “Receiving Entity” and “Submitting Entity” are used in §1500 of the ROP, without explicit definitions. Definitions were created for these two terms based on their use in ROP §1500.

“Receiving Entity” means NERC or a Regional Entity receiving Confidential Information from an owner, operator, or user of the Bulk Power System or from any other party.

“Submitting Entity” means an owner, operator, or user of the Bulk Power System or any other party that submits information to NERC or a Regional Entity that it reasonably believes contains Confidential Information.

- “Region” is used in various places in the ROP to describe a Regional Entity’s area of responsibility or operations. A definition was added for this term.

“Region” means the geographic area, as specified in the Regional Entity’s delegation agreement with NERC, within which the Regional Entity is responsible for performing delegated functions.

- “Registered Ballot Body” is used in §300 of the ROP and in Appendix 3A and Appendix 3D, without an explicit definition. In light of the frequent use of this term, a definition of “Registered Ballot Body” was added, based on the text in Appendix 3A describing the Registered Ballot Body, as:

that aggregation of all entities or individuals that qualify for one of the Segments approved by the Board of Trustees, and are registered with NERC as potential ballot participants in the voting on proposed Reliability Standards.

- “Reliability Standards Development Plan” is a term used in §310 of the ROP, without an explicit definition. A definition was added to identify “Reliability Standards Development Plan” as the forward-looking plan developed by NERC on an annual basis, as specified in ROP §310, setting forth the Reliability Standards development projects that are scheduled to be worked on during the ensuing three-year period.
- “Reporting Entity” is a term used in §1600 of the ROP, without an explicit definitions. A definitions of this terms was added, based on its use in ROP §1600.

“Reporting Entity” means an entity required to provide data or information requested by NERC or a Regional Entity in a request for data or information pursuant to Section 1600 of the Rules of Procedure.

- “Segment” is used in §300 of the ROP and in Appendices 3A and 3D to describe the categories of voters in the Registered Ballot Body for purposes of voting on proposed Reliability Standards. A definition was added for “Segment” as “one of the subsets of the Registered Ballot Body whose members meet the qualification criteria for the subset.”¹⁰

¹⁰ The criteria for inclusion in each of the 10 Segments of the Registered Ballot Body are now set forth in new Appendix 3D of the ROP, *Registered Ballot Body Criteria*, which was approved by FERC on November 17, 2011. *Order Approving Amendments to Rules of Procedure*, 137 FERC ¶ 61,130 (2011).

- “Violation Risk Factor” or “VRF” and “Violation Severity Level” or “VSL” are used extensively in §300 of the ROP, in Appendix 3A, *Standard Processes Manual*, and in Appendix 4B, *Sanction Guidelines*, without explicit definitions. Definitions were added for these terms, reflecting primarily the text describing them in Appendix 4B.

“Violation Risk Factor” or “VRF” means a factor (lower, medium or high) assigned to each Requirement of a Reliability Standard to identify the potential reliability significance of noncompliance with the Requirement.

“Violation Severity Level” or “VSL” means a measure (lower, moderate, high or severe) of the degree to which compliance with a Requirement was not achieved.

C. Revisions to the Existing Rules of Procedure and Appendices

The proposed revisions to the existing ROP (Sections 100-1600) and Appendices consist largely of the following types of changes: (1) capitalization of defined terms that are not currently capitalized (either due to lack of consistent capitalization in the existing ROP, or because a term that was formerly not a defined term has been made a defined term); (2) lower-casing terms that are currently capitalized but which are not defined terms and should not otherwise be capitalized under the criteria for capitalization described above and set forth on page 1 of Appendix 2; and (3) revising text that currently uses a term that is “close” to a defined term, to use the defined term. Examples of item (3) include: replacing the terms “standards” and “Standards” with the defined term “Reliability Standards;” replacing the term “audit” with the defined term “Compliance Audit;” replacing the phrase “appropriate governmental authority” with the defined term “Applicable Governmental Authority;” and replacing the term “stakeholder segment” with the defined term “Segment.”¹¹

In addition to the above-described “conforming” revisions which are the essence of this

¹¹ Replacement of “stakeholder segment” with the defined Term “Segment” was the result of a stakeholder comment received during the 45-day comment period on the proposed revisions.

project, there are a number of other revisions that have been made in various places in the ROP and Appendices that warrant express mention in this Petition and are described below.

Rules of Procedure Sections 100-1600

As noted above, the definitions in § 200, Definitions, of the ROP have been deleted, and included in new Appendix 2 (with modifications as appropriate). However, one of the defined terms in §200, “ERO Governmental Authority,” has been eliminated, and this term has been replaced wherever it appeared in the ROP and Appendices with the defined term “Applicable Governmental Authority.” Both defined terms, “ERO Governmental Authority” and “Applicable Governmental Authority,” currently are used in the ROP and Appendices, and have essentially the same definition. During the 45-day comment period, a stakeholder correctly pointed out that it was contrary to the objective of consistency to use these two defined terms in the ROP for essentially the same purpose. NERC agreed with this comment, and has eliminated the use of the term “ERO Governmental Authority” and replaced it with “Applicable Governmental Authority.”

Additionally, use of the terms “rule” and “paragraph” to refer to a provision of the ROP has been eliminated and these terms have been replaced with “section” for consistency (*see, e.g.*, sections 1503.5, 1503.6, 1602.1, 1602.2.2, 1606.3 and 1606.4 of the ROP (**Attachment 1B**)).

Appendix 3A, Standard Processes Manual

The revisions on page 5 (of the redlined version, **Attachment 3B**) under “Definition of a Reliability Standard” highlight a decision that was made in determining what definition to use for the term “Reliability Standard.” Initially, NERC planned to base the definition of “Reliability Standard” on the definitions of that term that appear in §215(a)(3) of the FPA and 18 C.F.R. §39.1 (and in the current Appendix 3A), on the basis that the definition from the source of

highest legal authority should be used. However, the definitions of Reliability Standard in FPA §215 and 18 C.F.R. §39.1 provide that a Reliability Standard must be “approved by the Commission under this section [section 215].” During the 45-day comment period, certain Canadian entities commented that the definition of Reliability Standard should not include a provision that the Reliability Standard must be “approved by the Commission under section 215,” but should also recognize the need for approval by other (*e.g.*, Canadian provincial or Mexican) Applicable Governmental Authorities. These commenters suggested that the definition of Reliability Standard currently found in §200 of the ROP should be used instead; that definition states in part: “A reliability standard shall not be effective in the United States until approved by the Federal Energy Regulatory Commission and shall not be effective in other jurisdictions until made or allowed to become effective by the applicable governmental authority.” NERC agreed with this comment and, accordingly, has based the definition of Reliability Standard in Appendix 2 (and in Appendix 3A) on the definition in current §200 of the ROP. The proposed definition includes the following text:

A Reliability Standard shall not be effective in the United States until approved by the Federal Energy Regulatory Commission and shall not be effective in other jurisdictions until made or allowed to become effective by the Applicable Governmental Authority.

On page 7 of the redlined version of Appendix 3A (**Attachment 3B**), the description of the “Compliance Enforcement Authority” has been revised (expanded) to parallel the definition of the defined term “Compliance Enforcement Authority.”

Appendix 3C, Procedure for Coordinating Reliability Standards Approvals, Remands, and Directives

On page 4 of the redlined version (**Attachment 5B**), a reference to the *Reliability Standards Development Procedure* has been changed to *Standard Processes Manual* to reflect

the current title of Appendix 3A.

Appendix 4C, Compliance Monitoring and Enforcement Program

Throughout Attachment 2 – Hearing Procedures to Appendix 4C, references to “[HEARING BODY]” have been changed to “Hearing Body,” which is a defined term. The original intent of the use of the phrase “[HEARING BODY]” was that each Regional Entity would insert the name or title of its particular Hearing Body, but that practice has not been followed. Accordingly, “[HEARING BODY]” is replaced with the defined term “Hearing Body,” which is defined in Appendix 2 as “the body established by a Regional Entity to conduct hearings pursuant to the Hearing Procedures.”

Appendix 4D, Procedure for Requesting and Receiving Technical Feasibility Exceptions to NERC Critical Infrastructure Protection Standards

In §3.1(vi) of Appendix 4D, the following revision has been made in the last clause of the subsection:

. . . where the incremental risk to the reliable operation of the Covered Assets; and to the Reliable Operation of the related Facility and the Bulk Electric System of continuing to operate with the existing equipment is minimal in the determination of the Regional Entity.

The reason for this change is that the defined term “Reliable Operation” (taken from 18 C.F.R. §39.1) refers to “operating the Elements of the Bulk Power System” However, some Covered Assets (defined as “a Cyber Asset or Critical Cyber Asset that is subject to an Applicable Requirement”) may not be “Elements of the Bulk Power System.” Accordingly, it was necessary to make the revision to §3.1(vi) shown above so that the non-defined term “reliable operation” would continue to apply to “Covered Assets” while the defined term “Reliable Operation” applies to “the related Facility and the Bulk Electric System.”

Appendix 5A, Organization Registration and Certification Manual

On page 19 of the redlined version (**Attachment 12B**), in §3.a, immediately after a reference to “CCCPP-005, *Hearing Procedures for Use in Appeals of Certification Matters*,” the following text has been added: “which is incorporated in **Appendix 4E** of the Rules of Procedure” (emphasis in original). This added text provides a reference to the ROP Appendix where the *Hearing Procedures for Use in Appeals of Certification Matters* are located.

Also on page 19 of the redlined version, in §5.c, a reference to “the Board” has been changed to “the BOTCC,” since from the context of the provision, the reference to “the Board” is erroneous and should be “the BOTCC.”

Appendix 5B, Statement of Compliance Registry Criteria

In the table on pages 6-7 of the redlined version (**Attachment 13B**), the text of the “Definition/Discussion” for each “Functional Type” has been revised as necessary to be consistent with the definition of the defined term for the functional type.

Appendix 6, System Operator Certification Manual

The term “transmission operator” used in Appendix 6 refers to a category of Certification Credential that can be earned by a system operator. Accordingly, the term “transmission operator,” where used in this sense in Appendix 6, is not capitalized, so that it will not be confused with the defined term “Transmission Operator” (defined in Appendix 2 as “the entity responsible for the reliability of its ‘local’ transmission system, and that operates or directs the operations of the transmission Facilities”).

IV. NERC APPROVALS FOR THE PROPOSED REVISIONS

The proposed revisions to the ROP were posted for stakeholder comment for a 45-day period, from September 2 to October 17, 2011, as specified by Article XI, section 2 of the NERC

Bylaws. A total of 16 sets of comments were received from various entities and organizations. As described at various points earlier in this Petition, a number of the comments were taken into account in making further revisions to the posted documents prior to presenting them to the NERC Board of Trustees for approval. Other comments pointed out several additional defined terms that should be added to Appendix 2 (and in at least one instance, a definition that was inappropriate and should be deleted), or suggested minor changes to the posted defined terms or their definitions. Comments also pointed out several necessary revisions that were missed in the posted set of documents (*e.g.*, failure to capitalize a defined term at a particular point in the ROP, or failure to lower-case a non-defined term), and these comments were also taken into account in making further revisions to the posted documents prior to presenting them to the NERC Board. However, some comments suggested additional revisions that would not be consistent with the criteria for capitalizing terms that had been established and are set forth in proposed Appendix 2, and therefore these comments were not adopted.

A number of other comments were received that NERC regards as good substantive points indicating the need for possible revisions to the ROP, but which NERC viewed as outside the scope of this particular initiative, which was not intended to make substantive changes to the ROP. NERC is continuing to evaluate these substantive comments in connection with a separate set of proposed, substantive revisions to the ROP and several Appendices which are currently posted for stakeholder comment.

A number of commenters suggested eliminating all “Definitions” and “Glossary” sections appearing in individual sections of the ROP and individual Appendices. This issue is discussed in §III.A above and, for the reasons there discussed, the separate “Definitions” and “Glossary” sections were retained for convenience of use of the individual Appendices (but revised, as

necessary, so that the definitions of terms set forth in the individual “Definitions” and “Glossary” sections match the definitions of those terms in Appendix 2). Some commenters also suggested not stating the definitions of defined terms whose definitions are taken from the NERC *Glossary of Terms Used in Reliability Standards*, but rather simply stating the definitions of those terms by a cross-reference such as “has the meaning set forth in the NERC *Glossary of Terms Used in Reliability Standards*.” NERC rejected this approach because it could result in changes to definitions in the *Glossary of Terms Used in Reliability Standards* being automatically incorporated into the ROP without going through the ROP revision process. Although NERC believes that, to the greatest extent practicable, definitions of terms established in the *Glossary of Terms Used in Reliability Standards* should also be used as the definitions of those terms in the ROP, there may be situations in which the definition of a term in the *Glossary of Terms Used in Reliability Standards* is not appropriate or workable in the context in which the term is used in the ROP, and a different definition of the term may be necessary for the ROP.

The NERC Board approved the proposed revisions to the ROP on November 3, 2011. Subsequent to that date, on November 17, 2011, FERC approved proposed revisions to Appendix 3B, *Procedures for Election of Members of the Standards Committee*, and proposed new Appendix 3D, *Registered Ballot Body Criteria*.¹² These proposed revisions to Appendix 3B, and proposed new Appendix 3D, were not included in the revisions to the ROP that were approved by the Board on November 3, 2011. Accordingly, additional revisions for defined terms and capitalization/lower casing of the changed portions of Appendix 3B and of Appendix 3D, consistent with the criteria previously established as described herein, were prepared for Board approval. In addition, it was necessary to add one new defined term (Open Access Transmission

¹² *Order Approving Amendments to Rules of Procedure*, 137 FERC ¶ 61,130(2011).

Tariff – used in new Appendix 3D) to Appendix 2. These additional revisions were presented to and approved by the NERC Board on November 22, 2011.

Respectfully submitted,

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ATTACHMENTS 1A – 15B

(Available on the NERC Website at
http://www.nerc.com/fileUploads/File/Filings/Attachments_ROP_CapProj.pdf)