
**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**INTERPRETATION OF TRANSMISSION) Docket No. RM10- 6-000
ASSESSMENT RELIABILITY STANDARD)**

**COMMENTS OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
IN SUPPORT OF THE SUPPLEMENTAL COMMENTS OF EDISON ELECTRIC
INSTITUTE, THE AMERICAN PUBLIC POWER ASSOCIATION, THE NATIONAL
RURAL ELECTRIC COOPERATIVE ASSOCIATION, THE ELECTRIC POWER
SUPPLY ASSOCIATION, THE TRANSMISSION ACCESS POLICY STUDY GROUP,
AND THE CANADIAN ELECTRICITY ASSOCIATION**

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July 13, 2011

I. COMMENTS

The North American Electric Reliability Corporation (“NERC”)¹ hereby provides these comments in support of the Supplemental Comments of the Edison Electric Institute, the American Public Power Association, the National Rural Electric Cooperative, the Electric Power Supply Association, the Transmission Access Policy Study Group, and the Canadian Electricity Association (collectively, the “Trade Associations”) filed with the Commission on July 13, 2011 (“Trade Associations’ July 13 Filing”).²

The Trade Associations’ July 13 filing supports NERC’s November 17, 2009 petition proposing approval of an interpretation to Reliability Standard TPL-002, Requirement R1.3.10³ and reiterates their request to the Commission to approve the interpretation as filed by NERC. Additionally, the Trade Associations demonstrate that the redundancy requirements that would be required by the Commission’s NOPR⁴ will be expensive (*i.e.*, estimated to be approximately \$24 billion nation-wide) and will not significantly increase bulk power system reliability. The Trade Associations urge swift approval of the interpretation as filed.

As a separate matter, the Trade Associations propose in their July 13 filing that, in order to further analyze the possibility of a potential system protection issue, the Commission should instruct its reliability staff to meet with NERC and subject matter experts to examine the issue,

¹ The Federal Energy Regulatory Commission (“FERC” or “Commission”) certified NERC as the electric reliability organization (“ERO”) in its order issued on July 20, 2006 in Docket No. RR06-1-000. *North American Reliability Corporation*, “Order Certifying North American Electric Reliability Corporation as the Electric Reliability Organization and Ordering Compliance Filing,” 116 FERC ¶ 61,062 (July 20, 2006).

² *Supplemental Comments of the Edison Electric Institute, the American Public Power Association, the National Rural Electric Cooperative Association, the Electric Power Supply Association, the Transmission Access Policy Study Group, and the Canadian Electricity Association*, Docket No. RM10-6-000 (July 13, 2011).

³ *Petition of the North American Electric Reliability Corporation for Approval of Interpretation to Reliability Standard TPL-002-0—System Performance Following Loss of a Single Bulk Electric System Element (Category B)*, Docket No. RM06-16-000 (November 17, 2009).

⁴ *Interpretation of Transmission Planning Reliability Standard*, Notice of Proposed Rulemaking, 130 FERC ¶61,208 (March 18, 2010).

and direct NERC to submit an informational filing to explain its view regarding whether there is a further system protection issue that needs to be addressed.

NERC supports the Trade Associations' proposal in the July 13 filing to implement measures that would give NERC, FERC Staff, and technical experts the opportunity to further examine whether there may be a potential system protection issue that needs to be addressed. NERC would thereafter make an informational filing with the Commission regarding whether there is a further system protection issue that needs to be addressed and if so, what forum and process should be used to address that issue and what priority it should be accorded relative to other reliability initiatives planned by NERC.

Finally, NERC renews its request that FERC approve the proposed interpretation as filed.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 13th day of July, 2011.

/s/ Holly A. Hawkins
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