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

**PLANNING RESOURCE ADEQUACY            )       Docket No. RM10- 10-000**  
**ASSESSMENT RELIABILITY STANDARD    )       )**

**COMMENTS OF THE  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION  
IN SUPPORT OF RELIABILITYFIRST CORPORATION'S COMMENTS IN  
RESPONSE TO NOTICE OF PROPOSED RULEMAKING**

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December 27, 2010

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## I. COMMENTS

The North American Electric Reliability Corporation (“NERC”)<sup>1</sup> hereby provides these comments in response to the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) Notice of Proposed Rulemaking (“RFC NOPR”)<sup>2</sup> regarding the Planning Resource Adequacy Analysis, Assessment, and Documentation Reliability Standard developed by ReliabilityFirst Corporation (“RFC”) and filed by NERC for approval.<sup>3</sup> NERC wishes to express support for the content of the RFC response to the Commission’s RFC NOPR filed in this docket, and considers the responses provided by RFC sufficient to clarify the concerns expressed by the Commission in the NOPR.

As stated in NERC’s petition for approval of the proposed RFC standard, the reliability of the Bulk Power System is best served by the implementation of this proposed Regional Reliability Standard because it establishes a consistent framework for planning resource analysis for load within the RFC footprint. Because the proposed standard supports the improved reliability of the Bulk Power System, NERC recommends FERC approval of the proposed standard.

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<sup>1</sup> 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).

<sup>2</sup> *Planning Resource Adequacy and Assessment Reliability Standard*, 133 FERC ¶ 61,066 (October 21, 2010) (“RFC NOPR”).

<sup>3</sup> NERC Petition for Approval of Proposed RFC Regional Reliability Standard BAL-502-RFC-02, Docket No. RM10-10-000 (December 14, 2009) (“NERC Petition”).

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 27th day of December, 2010.

*/s/ Holly A. Hawkins*  
Holly A. Hawkins  
*Attorney for North American Electric  
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