

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

**Transmission Planning**                    )     **Docket Nos. RM12-1-000 and**  
**Reliability Standards**                 )     **RM13-9-000**

**COMMENTS OF THE  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION  
IN RESPONSE TO SUPPLEMENTAL NOTICE OF PROPOSED RULEMAKING**

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 the “Commission”) May 16, 2013 Supplemental Notice of Proposed Rulemaking (“NOPR”)<sup>2</sup> regarding Reliability Standard TPL-001-4. The proposed modifications improve reliability and resolve issues and concerns with previous standards. The Supplemental NOPR proposes to approve proposed Reliability Standard TPL-001-4 and accept all modifications made thereto as satisfactory. NERC fully supports this action.

**I.     Background**

On February 28, 2013, NERC filed a petition seeking Commission approval of Reliability Standard TPL-001-4 (Version 4).<sup>3</sup> This filing was made in response to the Commission’s remand in Order No. 762 and was intended to address concerns identified in the Commission’s NOPR. The TPL-001-4 Reliability Standard includes a provision, Note 12, that allows for

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<sup>1</sup> NERC has been certified by the Commission as the electric reliability organization (“ERO”) in accordance with Section 215 of the Federal Power Act. The Commission certified NERC as the ERO in its order issued July 20, 2006 in Docket No. RR06-1-000. *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062 (2006) (“ERO Certification Order”).

<sup>2</sup> *Transmission Planning Reliability Standards*, Supplemental Notice of Proposed Rulemaking, 143 FERC ¶ 61,136 (May 16, 2013) (Docket Nos. RM12-1-000 and RM13-9-000).

<sup>3</sup> The full text of NERC’s petition is available online at: [http://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/Final\\_TPL\\_fn\\_b\\_2013.02.28\\_c omplete.pdf](http://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/Final_TPL_fn_b_2013.02.28_c omplete.pdf)

planned load shed in a single contingency provided that the plan is documented and alternatives are considered and vetted in an open and transparent stakeholder process.<sup>4</sup>

In the NOPR, FERC states that, though NERC's proposal differs from Commission directives, it satisfactorily addresses reliability concerns outlined by previous Commission orders and is thus an acceptable alternative solution. FERC also proposes to accept NERC's proposed implementation plan.<sup>5</sup>

## **II. Notices and Communications**

Notices and communications with respect to this filing may be addressed to the following:<sup>6</sup>

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## **III. Comments**

The NOPR makes specific mention of NERC's plan to monitor the use of Note 12 and issue a report containing the findings of the monitoring after two years of its implementation.<sup>7</sup>

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<sup>4</sup> The currently-effective TPL-001-2 Reliability Standard includes footnote b as Note 12 in the proposed TPL-001-2 Reliability Standard.

<sup>5</sup> *Transmission Planning Reliability Standards*, Supplemental Notice of Proposed Rulemaking at P 2.

<sup>6</sup> Persons to be included on the Commission's service list are identified by an asterisk. NERC respectfully requests a waiver of Rule 203 of the Commission's regulations, 18 C.F.R. § 385.203 (2012), to allow the inclusion of more than two persons on the service list in this proceeding.

NERC has proposed to issue this report by the end of the first calendar quarter following the first two years of implementation. FERC has proposed to accept this reporting plan as outlined by NERC.<sup>8</sup> NERC fully supports this action and remains committed to working with the Commission as the Reliability Standard is implemented.

#### **IV. Conclusion**

NERC respectfully requests that the Commission accept these comments for consideration.

Respectfully submitted,

*/s/ Brady A. Walker*

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**June 24, 2013**

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<sup>7</sup> *Transmission Planning Reliability Standards*, Supplemental Notice of Proposed Rulemaking at P 20.

<sup>8</sup> *Id.*

**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 24th day of June, 2013.

/s/ Brady A. Walker  
Brady A. Walker

*Counsel for North American Electric  
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