

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

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| Joint Staff White Paper on |) | |
| Notices of Penalty Pertaining to |) | Docket No. AD19-18-000 |
| Violations of Critical Infrastructure |) | |
| Protection Reliability Standards |) | |

**ISO/RTO COUNCIL’S MOTION IN SUPPORT OF MOTION FOR EXTENSION OF
TIME TO FILE COMMENTS**

The ISO/RTO Council (“IRC”)¹ files in support of the motion for extension of time filed by the Edison Electric Institute (“EEI”), the American Public Power Association (“APPA”), the National Rural Electric Cooperative Association (“NRECA”), the Large Public Power Council (“LPPC”), the Transmission Access Policy Study Group (“TAPS”), the Electric Power Supply Association (“EPSA”), and the Electricity Consumers Resource Council (“ELCON”), on behalf of their respective members (collectively, the “Joint Associations”), for an additional 30 days, until October 27, 2019, to file comments in response to the Federal Energy Regulatory Commission (“FERC”)/North American Electric Reliability Corporation (“NERC”) Joint Staff White Paper on Notices of Penalty for Violations of NERC CIP Standards (“White Paper”) issued in the above-

¹ The IRC comprises the Alberta Electric System Operator (“AESO”), the California Independent System Operator Corporation (“CAISO”), the Electric Reliability Council of Texas, Inc. (“ERCOT”), the Independent Electricity System Operator (“IESO”), ISO New England Inc. (“ISO-NE”), the Midcontinent Independent System Operator, Inc. (“MISO”), the New York Independent System Operator, Inc. (“NYISO”), PJM Interconnection, L.L.C. (“PJM”), and the Southwest Power Pool, Inc. (“SPP”). AESO and IESO are not subject to the Commission’s jurisdiction. Therefore, AESO and IESO are not joining these comments. Individual IRC members may also file separate comments.

referenced docket, and for a shortened comment period on the Joint Association's motion. Comments on the White Paper are currently due September 26, 2019.

I. COMMENTS

On August 27, 2019, the Commission issued the FERC/NERC White Paper.² In the White Paper, FERC and NERC staff proposed, for the first time, public disclosure of entity names, standard(s) violated, and penalty amounts, for settlement agreements and for matters handled pursuant to the Find, Fix and Track program and the Compliance Exception program. This proposal marks a significant change in how FERC and NERC propose to handle public disclosure of resolutions of CIP violations at all violation levels. Because this is a significant change, the IRC supports the request to extend the deadline to file comments by 30 days submitted by the Joint Associations, to afford commenters the opportunity to give this proposal full consideration and provide the Commission with thoughtful comments regarding this new proposal.

II. CONCLUSION

The IRC supports the Joint Associations' request for a 30-day extension of time, until October 27, 2019, to provide comments in this docket.

Respectfully submitted,

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² *Joint Staff White Paper on Notices of Penalty Pertaining to Violations of Critical Infrastructure Protection Reliability Standards*, Docket No. AD19-18-000 (Aug. 27, 2019) ("Joint Staff White Paper").

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Dated: September 17, 2019

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.³

Dated at Carmel, Indiana this 17th day of September, 2019.

/s/ Julie Bunn

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³ 18 C.F.R. § 385.2010 (2015).