

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

Monitoring System Conditions - Transmission)	Docket No. RM13-12-000
Operations Reliability Standard)	
Transmission Operations Reliability Standards)	Docket No. RM13-14-000
Interconnection Reliability Operations and)	Docket No. RM13-15-000
Coordination Reliability Standards)	

**COMMENTS OF THE ISO/RTO COUNCIL IN SUPPORT OF
MOTION OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
TO DEFER ACTION**

Pursuant to Rule 213 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission¹ (the “Commission”), the ISO/RTO Council (“IRC”) submits these comments in support of the Motion of the North American Electric Reliability Corporation (“NERC”) to Defer Action (the “Motion”).

I. IDENTIFICATION OF FILING PARTY

The IRC is comprised of the Alberta Electric System Operator (“AESO”); California Independent System Operator Corporation (“CAISO”); Electric Reliability Council of Texas, Inc. (“ERCOT”); the Independent Electricity System Operator (“IESO”); ISO New England Inc. (“ISO-NE”); Midcontinent Independent System Operator, Inc. (“MISO”); New York Independent System Operator, Inc. (“NYISO”); PJM Interconnection, L.L.C. (“PJM”); and Southwest Power Pool, Inc. (“SPP”).²

¹ 18 C.F.R § 385.213 (2013).

² AESO and IESO are not FERC-jurisdictional and AESO is not joining for jurisdictional reasons. However, IESO is joining in support of these comments.

II. COMMENTS

The NERC Motion requests the Commission to delay action in the Notice of Proposed Rulemaking issued in the referenced dockets on November 21, 2013 (the “NOPR”).³ In the NOPR, the Commission raised a concern that NERC has “removed critical reliability aspects that are included in the currently-effective standards without adequately addressing these aspects in the proposed standards.”⁴

The NERC Motion requests the delay of action in order to give NERC the opportunity to hold two technical conferences and concurrently, to work with the NERC Standards Committee to re-formulate a standard drafting team to prepare revisions (informed by the technical conferences) to the proposed standards at issue in the NOPR. The IRC believes this is a prudent course of action, and supports the process proposed in the NERC Motion.⁵

The TOP and IRO standards apply to two critical reliability functions - the Reliability Coordinator and Transmission Operator functions, which, with limited exceptions, IRC members perform. The IRC believes the NERC proposal, which utilizes proposed technical conferences and the standards development process, will facilitate a thorough review of the relevant issues by providing opportunities for input from all interested parties, including NERC and the Commission. Technical conferences and the standards development process are established means that allow opportunity for both formal and informal participation and comment. Accordingly, the IRC respectfully submits that the NERC proposal is a reasonable and judicious

³ *Monitoring System Conditions- Transmission Operations Reliability Standard Transmission Operations Reliability Standards Interconnection Reliability Operations and Coordination Reliability Standards*, 145 FERC ¶ 61,158 (2013).

⁴ NOPR at P 4.

⁵ These comments take no position on 1) the merits of the proposed standards; 2) the related concerns raised by the Commission in the NOPR; or 3) the proposed agenda for the technical conferences provided in Attachment A of the NERC Motion.

means to facilitate the development of effective and efficient revisions to the relevant standard groups and achieve industry consensus.

III. CONCLUSION

For the foregoing reasons, the IRC respectfully requests that the Commission grant the NERC Motion.

Respectfully submitted,

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