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July 31, 2007

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: *North American Electric Reliability Corporation, Docket No. RR06-1
Quarterly Report of the North American Electric Reliability Corporation
Regarding Analysis of Reliability Standards Voting Results
April – June 2007*

Dear Ms. Bose:

The North American Electric Reliability Corporation (“NERC”) hereby submits to the Commission the Quarterly Report of the North American Electric Reliability Corporation Regarding Analysis of Reliability Standards Voting Results April – June 2007. This quarterly report is called for by Paragraph 18 of the Commission’s January 18, 2007 Order in this Docket and by NERC’s March 19, 2007 compliance filing in response to the Commission’s January 18, 2007 Order.

Please contact the undersigned if you have any questions concerning this filing.

Respectfully submitted,

/s/ Owen E. MacBride
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Attachment

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

**NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION)**

Docket No. RR06-1-000

**QUARTERLY REPORT OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
REGARDING
ANALYSIS OF RELIABILITY STANDARDS VOTING RESULTS
APRIL — JUNE 2007**

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July 31, 2007

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I. INTRODUCTION

The North American Electric Reliability Corporation (“NERC”) submits its second quarter 2007 report on the analysis of voting results for reliability standards. This filing is responsive to the Commission’s January 18, 2007 Order¹ that requires NERC to closely monitor and report to the Commission the voting results for NERC Reliability Standards each quarter during the next three years. This second quarter 2007 report covers balloting results during April 1 – June 30, 2007 and includes NERC’s analysis of the voting results, including trends and patterns of stakeholder approval of NERC Reliability Standards. NERC submitted its first quarterly report on May 3, 2007 covering the balloting results for January 1 – March 31, 2007.²

II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to:

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Commission’s official service list.

¹ *Order on Compliance Filing*, 118 FERC ¶ 61,030 (2007), at P 18.

² *Quarterly Report of the North American Electric Reliability Corporation Regarding Analysis of Reliability Standards Voting Results January – March 2007*, Docket RR06-1 (May 3, 2007).

III. BACKGROUND

NERC develops reliability standards in accordance with Section 300 of its Rules of Procedure and the NERC *Reliability Standards Development Procedure*, which is Appendix 3A to the Rules of Procedure.³ In order for an entity or individual to vote on a proposed reliability standard, the individual or entity must join the registered ballot body, which includes all entities or individuals that qualify for one of ten stakeholder segments and have registered with NERC as potential voting participants. Each member of the registered ballot body is eligible to participate in the voting process and ballot pool for each standard action. The ten stakeholder segments are:

- Transmission Owners
- Regional Transmission Organizations and Independent System Operators
- Load-Serving Entities
- Transmission Dependent Utilities
- Electric Generators
- Electricity Brokers, Aggregators, and Marketers
- Large Electricity End Users
- Small Electricity Users
- Federal, State, and Provincial Regulatory or other Government Entities
- Regional Reliability Organizations and Regional Entities

Each standard action has its own ballot pool, populated by interested members of the registered ballot body. The individuals who join a ballot pool respond to a pre-ballot e-mail announcement associated with each reliability standard ballot action. The ballot pool votes to approve or reject each standard action. Specifically, the ballot pool votes determine first, the

³ Version 6.1, the current version of the *Reliability Standards Development Procedure*, was approved by the Commission's Order issued June 7, 2007, in Docket RR06-1-007. *Order on Compliance Filing*, 119 FERC ¶61,248 (2007).

need for and technical merits of a proposed standard action, and second, that appropriate consideration of views and objections received during the development process were considered.

The reliability standards development process includes three types of ballots: an initial ballot, a recirculation ballot, and a re-ballot. If an initial ballot achieves a quorum but includes any negative ballots submitted with comments on the proposed standard action, then a recirculation ballot must be conducted. If an initial ballot does not achieve a quorum, then a re-ballot is conducted using the same ballot pool, but with an extended ballot window.

Approval of a standard action requires both:

- A quorum, which is established by at least 75% of the members of the ballot pool for the standard action submitting a response with an affirmative vote, a negative vote, or an abstention; and
- A two-thirds majority of the weighted segment votes cast must be affirmative. The number of votes cast is the sum of affirmative and negative votes, excluding abstentions and non-responses.

The following process is used to determine if there are sufficient affirmative votes.

- The number of affirmative votes cast in each segment is divided by the sum of affirmative and negative votes cast to determine the fractional affirmative vote for each segment. Abstentions and non-responses are not counted for the purposes of determining the fractional affirmative vote for a segment.
- If there are less than ten entities that vote in a segment, the vote weight of that segment is proportionally reduced. Each voter within that segment voting affirmative or negative receives a weight of 10% of the segment vote. For segments with ten or more voters, the regular voting procedures are followed.
- The sum of the fractional affirmative votes from all segments divided by the number of segments voting⁴ is used to determine if a two-thirds majority affirmative vote has been achieved. (A segment is considered as “voting” if any member of the segment in the ballot pool casts either an affirmative or a negative vote.)
- A standard is approved if the sum of fractional affirmative votes from all segments divided by the number of voting segments is greater than two thirds.

⁴ When less than ten entities vote in a segment, the total weight for that segment is determined as one tenth per entity voting.

IV. SUMMARY OF BALLOTS DISCUSSED IN THIS REPORT

NERC conducted six ballots from April 1– June 30, 2007, each undertaken using the *Reliability Standards Development Procedure*. These six ballots can be grouped into five distinct groups of ballot events as follows:

- Supplemental Violation Risk Factors – One (1) Initial Ballot and One (1) Recirculation Ballot
- Interpretation of BAL-005 – Automatic Generation Control – Requirement 17 – One (1) Recirculation Ballot
- Nuclear Power Interface Coordination – One (1) Recirculation Ballot
- Balance Resources and Demand (BAL-007 – BAL-011) – One (1) Recirculation Ballot
- Interpretation of VAR-002 — Generator Operation for Maintaining Network Voltage Schedules - Requirements 1 and 2 – One (1) Initial Ballot

Each of the five ballot events reached the required quorum, that is, greater than 75% of the ballot pool created for the standard action voted. Each of the ballot events took place in April 2007.

- The initial ballot of the supplemental Violation Risk Factors for 24 requirements in some of the approved Version 1 reliability standards received sufficient affirmative ballots for approval but also included some negative ballots with comments, necessitating a recirculation ballot. The supplemental Violation Risk Factors were approved in the recirculation ballot. On May 4, 2007, NERC filed these Violation Risk Factors with the Commission for approval⁵ and on June 26, 2007 the Commission approved 22 of the Violation Risk Factors as filed.⁶
- The initial ballot for the Interpretation of BAL-005 – Automatic Generation Control – Requirement 17 was conducted during the first quarter of 2007 and received sufficient affirmative ballots for passage, but because there were some negative ballots submitted with comments, a recirculation ballot was necessary. The proposed

⁵ *Request of the North American Electric Reliability Corporation for Approval of Supplemental Violation Risk Factors for Version 1 Reliability Standards*, Docket RR07-12-000 (filed May 4, 2007).

⁶ *Order on Violation Risk Factors*, 119 FERC ¶61,321 (2007). The other two proposed Violation Risk Factors corresponded to two proposed reliability standards that were pending before the Commission at that time and therefore, as requested by NERC, were not addressed in the June 26 Order but were to be considered by the Commission when acting on the corresponding reliability standards. *Id.* at P 1.

Interpretation of BAL-005 – Automatic Generation Control – Requirement 17 was approved in the recirculation ballot.

- The initial ballot for the Nuclear Power Interface Coordination standard was conducted during the first quarter of 2007 and received sufficient affirmative ballots for passage, but because there were some negative ballots submitted with comments, a recirculation ballot was necessary. The proposed Nuclear Power Interface Coordination Reliability Standard was approved in the recirculation ballot.
- The initial ballot for a set of proposed Balance Resources and Demand Reliability Standards (BAL-007 – BAL-011) was conducted during the first quarter of 2007 and achieved a quorum; however, it did not receive sufficient affirmative ballots for passage. The drafting team responded to the negative comments received in the initial ballot and then conducted a recirculation ballot, with the expectation that some balloters who had cast a negative ballot would modify their ballot from “negative” to “affirmative” based on the drafting team’s responses to the comments. In the recirculation ballot, several additional ballot pool members voted, and others changed their ballots from “affirmative” to “negative”. As a result, in the recirculation ballot, the set of proposed Balance Resources and Demand Reliability Standards did not receive the two-thirds affirmative segment-weighted vote required for passage.
- The initial ballot for the Interpretation of VAR-002 Requirements 1 and 2 received sufficient affirmative ballots for passage, but some negative ballots were submitted with comments, necessitating a recirculation ballot. The recirculation ballot is being conducted during the third quarter of 2007 and will be discussed in NERC’s quarterly report on standards balloting results for the third quarter of 2007.

A detailed discussion of the ballot results for each ballot event in the second quarter of 2007 is contained in **Exhibit A** to this filing.

Respectfully submitted,

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EXHIBIT A:
Analysis of 2nd Quarter 2007 Reliability Standard Balloting Results

Introduction

On January 18, 2007, the Commission issued its *Order on Compliance Filing* (“January 18 Order”), acting on a compliance filing by the North American Electric Reliability Corporation (“NERC”) in response to the Commission’s Order certifying NERC as the nation’s Electric Reliability Organization (“ERO”) under Section 215 of the Federal Power Act. The January 18 Order requires NERC to closely monitor the voting results for reliability standards and to report to the Commission quarterly for the next three years NERC’s analysis of the voting results, including trends and patterns that may signal a need for improvement in the voting process. In its compliance filing in response to the January 18 Order, NERC stated it will file its initial quarterly report with the Commission for the first quarter of 2007 and will submit subsequent quarterly filings for the next three years. This is the second quarterly report on the analysis of voting results for reliability standards and reports on ballot events during the second quarter (April 1 – June 30) of 2007.

Background

The NERC reliability standards development process is administered by action of the NERC Standards Committee. The Standards Committee officially approves the scope and purpose of standards authorization requests (“SAR”), appoints standard drafting teams to develop standards, authorizes field tests of proposed standards when necessary, and approves the proposed standards for ballot. The goal of the reliability standards development process is to gain industry consensus on the need and technical sufficiency of proposed standards. Consensus is primarily established through various formal industry comment periods designed to obtain stakeholder input on the proposed standards.

The members of the registered ballot body, comprising entities or individuals registered in one of ten stakeholder segments, must specifically request to be included in the ballot pool for a standard ballot event. Any entity or interested individual may become a member of the registered ballot body, but only the ballot pool members are allowed to vote on the proposed standard once the balloting begins. If the ballot pool approves a proposed standard as described below, the standard is presented to the NERC Board of Trustees for its approval and subsequent filing for approval with the Commission and regulatory authorities in Canada.

The NERC *Reliability Standards Development Procedure* provides for three different types of ballots - an initial ballot, a recirculation ballot, and a re-ballot. To “pass”, a ballot must achieve a quorum (at least 75% of the members of the ballot pool must return a ballot) **and** must receive an

affirmative vote that is at least two-thirds of the weighted segment average of all ballots returned with a vote.

- If a ballot achieves a quorum but includes any negative ballots submitted with comments, then a re-circulation ballot must be conducted.
- If a ballot does not achieve a quorum, then a re-ballot is conducted using the same ballot pool, but with an extended ballot window.

There were six ballots conducted during the second quarter of 2007, as shown in the table below; two were initial ballots and four were recirculation ballots. Since two of the ballots were related, the ballots are discussed below as five distinct groups of “ballot events.”

Ballot Event #	Ballot Name	Initial Ballot Dates	Recirculation Ballot Dates	Ballot Pool Size	Total # of Votes	Quorum	Weighted Segment Approval
1	Supplemental Violation Risk Factors	Apr 16–21, 2007		223	188	84.30 %	91.29 %
			Apr 23–27, 2007	223	203	91.03 %	89.97 %
2	Interpretation of BAL-005 R17			235	198	84.26%	97.10%
			Apr 17–26, 2007	235	221	94.04 %	96.66 %
3	Nuclear Power Interface Coordination			183	164	89.62%	77.10%
			Apr 17–26, 2007	183	176	96.17 %	79.94 %
4	Balance Resources and Demand (BAL-007 – BAL-011)			223	187	83.86 %	64.60 %
			Apr 17–26, 2007	223	213	95.52 %	57.30 %
5	Interpretation of VAR-002 R1 and R2	Apr 17–26, 2007		224	187	83.48 %	97.23 %

Discussion of Second Quarter 2007 Ballot Events

1. **The first ballot event in the second quarter of 2007** consisted of an initial ballot and a recirculation ballot for a set of 24 Version 1 Violation Risk Factors.

Violation Risk Factors describe the potential reliability significance of violating each requirement of a reliability standard, designated as a “High”, “Medium”, or “Lower” risk factor. Because the concept of Violation Risk Factors was not included in the original reliability standards development process, a drafting team was appointed to develop Violation Risk Factors for all the standards that had been approved by their respective ballot pools. Violation Risk Factors are one component used by compliance personnel in determining the size of a sanction or penalty associated with violation of a requirement.

The ballots for Version 0 and Version 1 Violation Risk Factors were conducted during the last quarter of 2006 and the first quarter of 2007. In conducting a review of the standards,

NERC staff discovered that the drafting team missed developing risk factors for a total of 24 requirements in the following approved standards:

- FAC-003-1 – Transmission Vegetation Management Program
- FAC-010-1 – System Operating Limits Methodology for the Planning Horizon
- FAC-014-1 – Establish and Communicate System Operating Limits
- COM-002-2 – Communication and Coordination
- PRC-005-1 – Transmission and Generation Protection System Maintenance and Testing

The Standards Committee authorized the use of the Urgent Action process in the NERC *Reliability Standards Development Procedure* to ballot the 24 violation risk factors. Because the Urgent Action process does not include any comment period, the proposed Violation Risk Factors were based on either the risk factor assigned to the same or similar requirement in an earlier version of the same standard, or the risk factor assigned to a similar requirement in another standard.

The initial ballot was conducted from April 16 – 21, 2007 and achieved a quorum (84%) and a weighted approval of 91%. There were 17 negative ballots submitted with comments. Some balloters identified more than one reason for their negative ballot. Because none of the reasons provided was identified by a majority of the members of the ballot pool, none of the Violation Risk Factors was modified between the initial ballot and the recirculation ballot.

Most of the comments submitted related to the Violation Risk Factors for standard FAC-003-1 – Transmission Vegetation Management Program.

- There were eight comments indicating that the Violation Risk Factor for Requirement 2 (to have and implement an annual vegetation management plan) should be modified from High to Medium because the requirement to “have a plan” is administrative.
 - The Violation Risk Factor was not changed because although the purpose of the requirement is to implement a plan to support reliability, it is much more than an administrative requirement. For example, the failure to have and implement an effective vegetation management plan could lead directly to outages and other disturbances on the bulk power system due to contact between tree limbs and transmission lines during windstorms, rain storms or ice storms or simply as a result of contact due to tree growth and line sag.
 - There was no public comment period for this Violation Risk Factor because it was developed using the Urgent Action process. The drafting team used the Violation Risk Factors selected by stakeholders for standard FAC-003-0 as a basis in proposing Violation Risk Factors for the same or similar requirements in FAC-003-1. There is a requirement in FAC-003-0 to have a vegetation management program, and stakeholders supported giving this requirement a High Violation Risk Factor.

- There were two comments indicating that the Violation Risk Factor for Requirement 1.3 (personnel involved in the transmission vegetation management program must have appropriate qualifications and training) should be modified from High to Medium because lack of personnel with appropriate qualifications will not necessarily lead to cascading failures on the bulk power system.
 - The Violation Risk Factor for Requirement 1.3 was not changed because (i) most stakeholders supported the High rating and (ii) since FAC-003-0 did not include any requirements referencing training or qualifications of personnel, the drafting team used the Violation Risk Factors selected by stakeholders for standard PER-002-0 (which requires system operators to be trained and qualified) as a basis in proposing Violation Risk Factors for the similar requirements in FAC-003-1. Stakeholders assigned requirements referencing training of system operators a High Violation Risk Factor.
- There were two additional comments indicating, in general, that the Violation Risk Factors proposed for FAC-003 were too high, without making any specific recommendations for modifications.

There were two comments indicating that the Violation Risk Factors for PRC-005-1 – Transmission and Generation Protection System Maintenance and Testing should be modified.

- There was one comment indicating that the Violation Risk Factor associated with Requirement 2.1 (maintain and test protection systems within defined intervals) should be modified because failure to test relays will not directly lead to widespread outages; and one comment indicating that the Violation Risk Factor should be changed from High because Requirement 2 has a Lower Violation Risk Factor.
 - The Violation Risk Factor for Requirement 2.1 was not changed because most stakeholders supported the High risk factor and because there are parallel requirements in standard PRC-017-0 to have a maintenance and testing program for Special Protection Systems, which stakeholders supported assigning a High Violation Risk Factor.

There were four comments indicating that the Violation Risk Factor for FAC-010-1 – System Operating Limits Methodology for the Planning Horizon should be changed.

- All four comments were worded identically and suggested that the risk factor for Requirement 2.3.2 should be modified from Medium to Lower because violations that take place in the planning horizon should not be as severe as those occurring in the operating horizon. (The Violation Risk Factor for the companion requirement in FAC-011-1 - System Operating Limits Methodology for the Operating Horizon is Medium.)
- The Violation Risk Factor for Requirement 2.3.2 was not changed because the ERO Rules of Procedure allow the assignment of High, Medium or Lower Violation Risk Factors to both operating and planning-related requirements. The wording of FAC-010-1, Requirement 2.3.2 is exactly the same as the wording in FAC-011-1,

Requirement R2.3.2, and stakeholders gave FAC-011-1, Requirement 2.3.2 a Medium rating.

There were four other comments that were submitted with a negative ballot that were generic in nature. One comment indicated that “bundling” the Violation Risk Factors in a single ballot was unacceptable. Three comments indicated that, in general, the Violation Risk Factors were too high.

The recirculation ballot was conducted from April 23 – 27, 2007 and the proposed Violation Risk Factors passed with a weighted segment approval of 89.97%.

2. **The second ballot event in the second quarter of 2007** was a recirculation ballot for Interpretation of BAL-005 – Automatic Generation Control Requirement 17.

The Interpretation clarifies that the Balancing Authority is required to check and calibrate its control room time error and frequency devices against a common reference at least annually, but the requirement to “annually check and calibrate” does not apply to any devices outside of the operations control room.

The initial ballot was conducted during the first quarter of 2007 and achieved a quorum and a high affirmative vote.

The recirculation ballot was conducted from April 17 – 26, 2007 and the Interpretation passed with a weighted segment approval of 96.66%.

3. **The third ballot event in the second quarter of 2007** was a recirculation ballot for the Nuclear Power Interface Coordination standard.

The Nuclear Plant Interface Coordination standard requires coordination between nuclear plant generator operators and transmission entities to ensure safe operation and shutdown of nuclear plants. The ballot for this standard also included the Nuclear Plant Interface Coordination Implementation Plan.

The initial ballot was conducted during the first quarter of 2007 and achieved a quorum and a high affirmative vote.

The recirculation ballot was conducted from April 17 – 26, 2007 and the standard passed with a weighted segment approval of 79.94%.

4. **The fourth ballot event in the second quarter of 2007** was a recirculation ballot for the set of Balance Resources and Demand standards (BAL-007 through BAL-011).

The proposed set of new Balance Resources and Demand (BAL-007 through BAL-011) standards requires entities to maintain interconnection scheduled frequency within a predefined frequency profile under all conditions (i.e., normal and abnormal), to prevent

unwarranted load shedding and to prevent frequency-related cascading collapse of the interconnected grid.

The proposed standards were field tested for more than a year, with voluntary participation of balancing authorities and their associated reliability coordinators. The volunteers represented approximately 50% of the loads in the Eastern Interconnection and the Electric Reliability Council of Texas (“ERCOT”). There were no participants in the field test from the Western Electricity Coordinating Council (“WECC”), Northeast Power Coordinating Council (“NPCC”) or Florida Reliability Coordinating Council (“FRCC”) regions.

The initial ballot was conducted during the first quarter of 2007 and achieved a quorum but received only a 65% affirmative vote, just short of the two-thirds affirmative vote required for approval. There were 35 negative ballots submitted with comments. The comments submitted with the negative ballots cited a variety of process-related as well as technical reasons for the negative ballots. The drafting team addressed the comments submitted with the initial ballot and believed that the responses would sway sufficient balloters to modify their initial ballot from “negative” to “affirmative” for the standards to pass.

The recirculation ballot was conducted from April 17 - 26, 2007 and did not achieve a weighted segment approval high enough to pass. In the recirculation ballot several balloters changed their vote from “affirmative” to “negative” and several ballot pool members who did not participate in the initial ballot cast a “negative” ballot in the recirculation ballot.

Between the initial ballot and the recirculation ballot, the percentage of ballot pool members who returned a ballot increased from 83.86% to 95.52% with 26 balloters participating in the recirculation ballot who did not participate in the initial ballot, and the approval declined from 64.6% to 57.3%. Of the 26 additional ballots, fourteen balloters cast an affirmative ballot and twelve balloters cast a negative ballot. Additionally, ballot pools members who voted in the initial ballot changed their votes as follows:

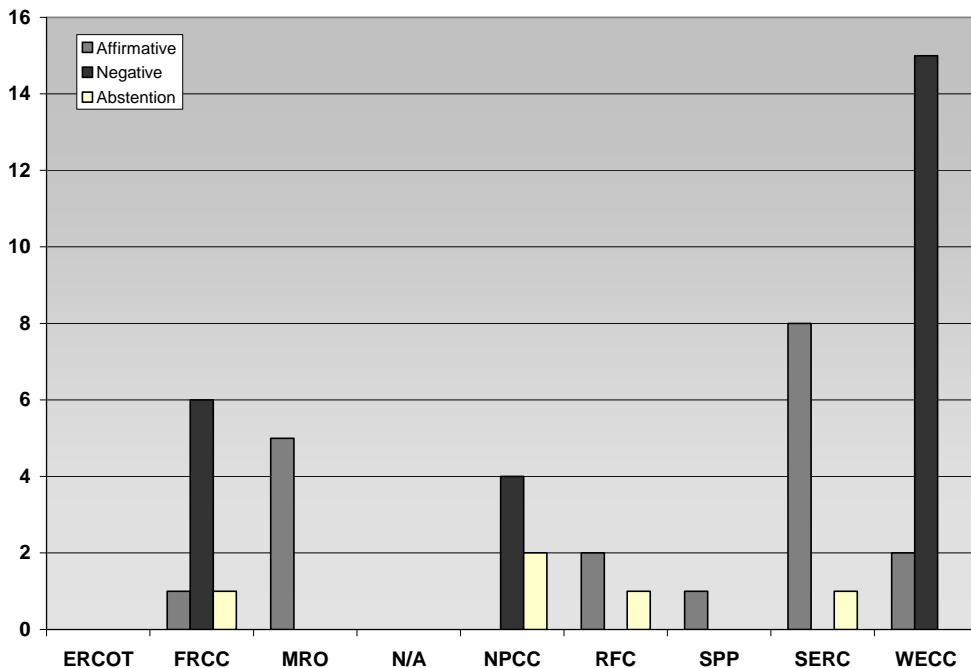
- Four negative ballots were changed to affirmative ballots
- One negative ballot was changed to an abstention
- One abstention was changed to an affirmative ballot
- Four affirmative ballots were changed to abstentions
- Eleven affirmative ballots were changed to negative ballots
- Two abstentions were changed to negative ballots

The changes in ballots did follow a pattern, in that the new negative ballots were primarily from three regions: FRCC, NPCC and WECC. Of the eleven balloters who changed their affirmative ballot to a negative ballot, three balloters provided a comment with their ballot and all three referenced concerns that the proposed standards may have an adverse impact on reliability under some conditions that may not have been studied by the drafting team.

The chart below shows that of the new or modified ballots, all of the new negative ballots came from balloters within FRCC, NPCC and WECC.

New or Modified Recirculation Ballots by Region

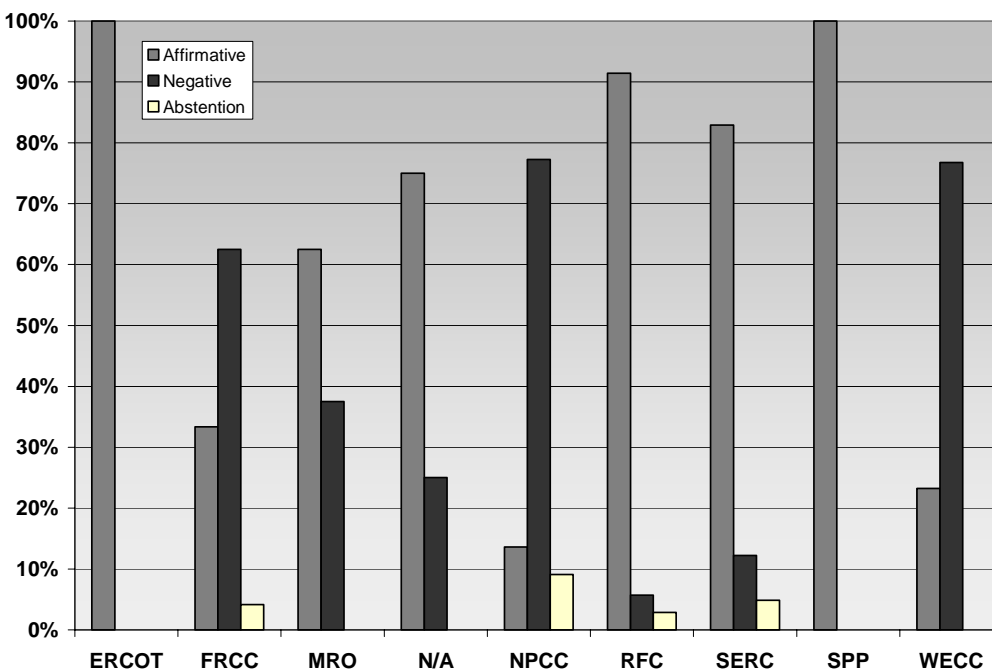
of Ballots



The chart below breaks down the total number of ballots cast within each region during both the initial and recirculation ballot, to show the percentage of ballots cast from each region by ballot type (affirmative, negative or abstention).

% of Ballots Cast

Analysis of Each Region's Total Ballots Cast



Within a few days of the end of the recirculation ballot, members of the Balance Resources and Demand drafting team developed a new SAR that expands the scope of topics addressed by the proposed BAL-007 through BAL-009 standards to address the concerns expressed in the negative comments submitted with the initial ballot. The expanded scope within the new SAR includes retention of the proposed BAL-007 through BAL-009 but also addresses the two primary reasons stated for voting against the proposed standards and addresses two performance areas identified during the field test. The new SAR includes provision for the following:

- Provides additional opportunities for entities who did not participate in the field test to field test the proposed requirements (this was the primary reason stated by WECC ballot pool members for not voting in favor of BAL-007 through BAL-009).
- May include requirements to limit area control error (this was the primary reason stated by NPCC ballot pool members for not voting in favor of BAL-007 through BAL-009)
- May include requirements to control frequency excursions of short duration attributed to the ramping of on and off-peak Interchange Transactions
- May include requirements to require corrective load/generation management within a defined timeframe when area control error is impacted by the curtailment of interchange transactions under transmission loading relief procedures.

The fifth ballot event in the second quarter of 2007 was an initial ballot for an Interpretation of VAR-002 – Generator Operation for Maintaining Network Voltage Schedules Requirements 1 and 2.

The Interpretation clarified that the term “automatic voltage control and controlling voltage” can only be accomplished by using the automatic voltage control mode. Using the Power Factor or constant MVAR control is not an acceptable method of controlling voltage even though these methods may have some effect on voltage.

The initial ballot was conducted from April 17 – 26, 2007 and achieved a quorum and sufficient affirmative ballots for passage, but there were four negative ballots cast with comments, necessitating a recirculation ballot.

- Three balloters suggested that the Interpretation was not acceptable because they have equipment that could not meet the requirement to have generators in automatic voltage control mode and controlling voltage. The drafting team did not modify the Interpretation in response to these comments because the standard does allow the transmission operator to exempt generators from compliance with the requirement.
- One balloter indicated that the Interpretation could be misleading. The drafting team did not modify the Interpretation in response to this comment because the Interpretation was not intended to be read in isolation from the rest of the standard; rather, the Interpretation will be appended to the standard and is intended to be read in context with the other requirements in the standard.

The recirculation ballot was not conducted during the second quarter of 2007.

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 Chicago, Illinois this 31st day of July, 2007.

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