

**COMMENTS OF THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION ON  
PROPOSED CHANGES TO NERC RULES OF PROCEDURE AND ASSOCIATED APPENDICES  
(Posted by NERC on September 2, 2011)**

The National Rural Electric Cooperative Association (NRECA) appreciates the opportunity to provide comments on NERC's proposal to modify the NERC Rules of Procedure (ROP) and associated Appendices regarding the proposed new Appendix 2, Definition of Terms Used in the Rules of Procedure.

- **Multiple Definition Sources** – While NERC has taken steps to minimize overlap among the various definition sources in its governance documents, there remains concern that there will be conflicts and confusion regarding defined terms and their intended uses in various NERC documents. We urge NERC to take every step possible to prevent these conflicts from arising in NERC governance documents. Every effort needs to be made to have only one definition for a particular term regardless of the NERC governance document where it is included. This also includes eliminating those situations where a single defined term has multiple definitions within the same document.
- **Bulk Power System** – The last sentence of this definition is confusing and should be clarified. As written the definition appears to state that “Bulk Electric System or BES” is only applicable to Appendix 4E. BES should be applicable to the full ROP and the CMEP. NERC should clarify this in a revised BPS definition.
- **CCC** – While “CCC” is defined as “the NERC Compliance and Certification Committee,” there should also be a definition of the “NERC Compliance and Certification Committee.”
- **Critical Infrastructure Protection Standard** – These standards are likely to change and CIP-002 through CIP-009 will no longer be accurate at some point in the future. Also, it is unclear why CIP-001 was not included in the definition. As an alternative definition to replace the proposed definition, we suggest “all NERC reliability standards with the prefix “CIP.”
- **Final Penalty Amount** – Suggest that this definition also include language stating this is “the amount included in the NOP.”
- **Functional Entity** – Suggest that this definition also include language stating that these “are listed in the NERC Functional Model.”
- **Regional Criteria** – This definition is confusing as it references “reliability requirements,” but states these requirements “are not reliability standards.” In addition, there is reference to enforcement “through other available mechanisms.” NERC needs to provide significant clarity on what these “reliability requirements” are and how they “are not reliability standards.” NERC needs to also further explain what the “other mechanisms” are as referenced in this definition.
- **Reliability Standards Development Plan** – This definition should include a specific reference to the stakeholder review aspect of the development of the plan.

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