

**REVISIONS TO PROPOSED NEW SECTIONS 1.1.24 & 5.11 OF APPENDIX 4C OF THE NERC RULES OF
PROCEDURE**

**Comments of ACES Power Marketing, Arizona Electric Power Cooperative, Southwest Transmission
Cooperative, Old Dominion Electric Cooperative**

Comments: We appreciate the opportunity to provide comments on the Revisions to Proposed New Sections 1.1.24 and 5.11 of Appendix 4C of the NERC Rules of Procedure (ROP).

Section 1.1.24 Comments

We have no comments to submit.

Section 5.11 Comments

In 5.11.2 bullet 6, if the specified other entity(ies) was not listed on the Public Notification List as of the date of issuance of the Notice of Possible Violation, the ISO/RTO may submit "a statement demonstrating that there are extraordinary circumstances" which would warrant the CEA to make the requested determination about the specified other entity(ies) even though they are not on the list. We assume the use of "extraordinary circumstances" is in reference to the events leading to the possible violation and not circumstances supporting why the specified other entity(ies) is not on the list. In addition, since it's the ISO/RTO's responsibility to ensure the list on file with NERC is accurate, there should be a time limitation placed on them for submitting changes to the list in order for an entity to be considered under this bullet item. Section 5.11.1 bullet 2 says "the ISO/RTO shall provide revisions...to NERC from time to time..." From "time to time" leaves it very open to interpretation as to what a reasonable time frame is and there should be some assurance that the ISO/RTOs are doing their due diligence in this process.