

Wisconsin Electric Power Company respectfully submits these comments:

Proposed RoP 321. Special Rule to Address Certain Regulatory Directives, Section 2.2 "... and negative votes with substantive comments shall be counted for purposes of determining the number of votes cast and whether the proposed standard passes." is not in agreement with the ANSI requirements below.

The counted ballots must include "...all negative votes accompanied by any comments that are related to the proposal under consideration. This includes negative votes accompanied by comments concerning potential conflict or duplication of the draft standard with an existing American National Standard and negative votes accompanied by comments of a procedural or philosophical nature."

"ANSI Essential Requirements: Due process requirements for American National Standards"

2.7 Evidence of consensus and consensus body vote:

2. (ANSI-Accredited Standards Developers) ASDs shall record and consider all negative votes accompanied by any comments that are related to the proposal under consideration. This includes negative votes accompanied by comments concerning potential conflict or duplication of the draft standard with an existing American National Standard and negative votes accompanied by comments of a procedural or philosophical nature. These types of comments shall not be dismissed due to the fact that they do not necessarily provide alternative language or a specific remedy to the negative vote.

Best Regards,

Barb Kedrowski
Project Manager
Federal Regulatory & Policy
We Energies
414-221-3572

Barbara.Kedrowski@we-energies.com

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