

*As stated in SPP's response, the Federal Energy Regulatory Commission has recognized "the potential benefits of having the same boundaries for an RTO/ISO and a Regional Entity." (1) The primary goal of FERC and NERC is improving the reliability of the Bulk Electric System. From this statement, the simple business reason for a utility to request and NERC to accept such a transfer is recognizing the potential for such improvement. Even with the MRO/SPP RE Coordination Guideline in place as stated within the MRO report, duplicate work does exist for registered entities in Nebraska. As SPP states, duplicate work includes registered entities to understand and abide by the variations in the regional criteria or standards maintained by SPP RTO, as a Reliability Coordinator, and MRO as a Regional Entity. Any registered entity with reduced regional criteria variations and possible confusion with such variations will only increase the reliability of the Bulk Electric System.*

(1) *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards*, Order No. 672, 2006-2007 FERC Stats. & Regs., Regs. Preambles ¶ 31,204 at P. 671 (2006).