



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

June 24, 2011

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

**Electric Reliability Organization Interpretation of Transmission Operations  
Reliability Standard, Docket No. RM10-29-000**


Dear Ms. Bose,

The North American Electric Reliability Corporation (“NERC”) submits this letter in response to the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) Notice of Proposed Rulemaking (“NOPR”)<sup>1</sup> regarding the Electric Reliability Organization Interpretation of Transmission Operations Reliability Standard issued April 21, 2011. In the NOPR, the Commission proposes to approve NERC’s Interpretation of Reliability Standard TOP-001-1 Requirement R8. NERC wishes to express its appreciation and support for the Commission’s proposed approval of the Interpretation. NERC also appreciates FERC’s agreement with NERC’s clarification of the responsibilities of a balancing authority and transmission operator during a system emergency.

Additionally, NERC would like to express its agreement with the Commission’s decision to submit the proposed rule to the Office of Management and Budget for informational purposes only as this proposed Interpretation will not affect entities’ current reporting burden. NERC further agrees with FERC’s analysis in the NOPR that the Regulatory Flexibility Act is not implicated by this proposed rulemaking.

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<sup>1</sup> *Electric Reliability Organization Interpretation of Transmission Operations Reliability Standard*, Notice of Proposed Rulemaking, 135 FERC ¶ 61,042 (2011).



Respectfully submitted,

*/s/ Andrew M. Dressel*

Andrew M. Dressel

Attorney

*North American Electric Reliability Corporation*