Comment Period Opens

Proposed Amendments to NERC Rules of Procedure Section 509, Section 1703 and Appendix 5C

Comment Period Ends October 27, 2011

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The North American Electric Reliability Corporation (NERC) is proposing changes to its Rules of Procedure (ROP) and associated Appendices.

NERC is requesting comments on a proposed revision to the NERC Rules of Procedure to add new sections 509 and 1703, as well as, Appendix 5C: *Procedure For Requesting and Receiving An Exception From The Application Of The NERC Definition of Bulk Electric System.* The comment period begins September 13, 2011 and ends October 27, 2011.

The proposed revisions are in response to FERC Orders 743 and 743A where NERC was directed to revise the definition of the Bulk Electric System (BES) and to develop a proposed exemption process. The proposed amendments would effectuate the exemption process directive by creating a new ERO rule implementing an exceptions process.

Under this process entities would be allowed to pursue either including within the BES an Element or Elements that would otherwise be excluded by application of the BES Definition or excluding from the BES an Element or Elements that would otherwise be included by application of the BES Definition. This exception process was developed with the participation of interested stakeholders who believe it to be practical in application and less burdensome than the NOPR proposal where a Regional Entity would have sought ERO and Commission approval before exempting each facility rated at 100kV or above from compliance with the Reliability Standards.

**Materials Included in this Request for Comments**

* Proposed new Section 509: Exceptions to the Definition of the Bulk Electric System
* Proposed new Section 1703: Challenges to NERC Determinations of BES Exception Requests under ROP Section 509
* Proposed new Appendix 5C: *Procedure for Requesting and Receiving An Exception From the Application of The NERC Definition of Bulk Electric System* (clean and redline showing changes from the May 2011 posting)

**Additional Materials Included for information**

* Consideration of comments from May 2011 posting
* BES Exception Request flowchart and timelines
* Exception Request Form template

**Submission of Comments**

Comments are due **October 27, 2011,** and must be submitted electronically using the form provided.

1. The ROP team believes the proposed amendments represent a process that balances the need for effective and efficient reliability administration with due process and clarity of expectations. Do you agree? **Please comment why or why not…If not please offer your proposed revision.**

*Yes*

No

Comments:

1. The ROP team believes the proposed amendments represent a process that is consistent, repeatable, and verifiable. Do you agree? **Please comment why or why not…If not, please offer your proposed revision.**

*Yes*

No

Comments:

1. The ROP team believes the proposed amendments represent a process that supports consistent treatment of transmission lines that cross international borders. Do you agree? **Please comment Please comment why or why not…If not, please offer your proposed revision.**

*Yes*

No

Comments:

1. The ROP team believes the proposed amendments represent a process that helps alleviate concerns about a “one-size fits all” approach. Do you agree? **Please comment why or why not…If not, please offer your proposed revision.**

*Yes*

No

Comments:

1. The ROP team believes the proposed amendments represent a process that allowed commenters to raise and address a number of their substantive concerns. Do you agree? **Please comment Please comment why or why not…If not, please offer your proposed revision.**

*Yes*

No

Comments:

Do you have any other comments not covered above?

Comments: