

June 20, 2019

VIA OVERNIGHT MAIL

Sheri Young, Secretary of the Board
National Energy Board
517 – 10th Avenue SW
Calgary, Alberta
T2R 0A8

Re: *North American Electric Reliability Corporation*

Dear Ms. Young:

The North American Electric Reliability Corporation (“NERC”) hereby submits Notice of Withdrawal of the North American Electric Reliability Corporation for Proposed Reliability Standard MOD-001-2. NERC requests, to the extent necessary, a waiver of any applicable filing requirements with respect to this filing.

Please contact the undersigned if you have any questions concerning this filing.

Respectfully submitted,

/s/ Lauren Perotti

Lauren Perotti
*Senior Counsel for the North American Electric
Reliability Corporation*

Enclosure

3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

**BEFORE THE
NATIONAL ENERGY BOARD**

**NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION)**

**NOTICE OF WITHDRAWAL OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
FOR PROPOSED RELIABILITY STANDARD MOD-001-2**

The North American Electric Reliability Corporation (“NERC”) hereby submits this notice of withdrawal for its filing of proposed Reliability Standard MOD-001-2.

I. Background

On February 18, 2014, NERC submitted a Notice of Filing of proposed Reliability Standard MOD-001-1.¹ In NERC’s filing, NERC also sought the retirement of Reliability Standards MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-1a, and MOD-030-2 (“MOD A” Standards). On June 19, 2014, the Federal Energy Regulatory Commission (“FERC”) issued a Notice of Proposed Rulemaking (“NOPR”) proposing to approve MOD-001-2 and the retirement of the MOD A Standards.²

¹ *Notice of Filing of NERC of Proposed Reliability Standard MOD-001-2 and Retirement of Reliability Standards MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-1a, and MOD-030-2.*

² *Modeling, Data, and Analysis Reliability Standards* (2014), 147 FERC ¶ 61,208.

II. Notices and Communications

Notices and communications with respect to this filing may be addressed to the following:

Shamai Elstein
Assistant General Counsel, Legal and Regulatory
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099 – facsimile
shamai.elstein@nerc.net

Howard Gugel
Vice President and Director of Engineering and Standards
North American Electric Reliability Corporation
3353 Peachtree Road, N.E.
Suite 600, North Tower
Atlanta, GA 30326
(404) 446-2560
(404) 446-2595 – facsimile
howard.gugel@nerc.net

III. Support for Withdrawal

Since the issuance of the NOPR, NERC has completed a comprehensive review of its Reliability Standards under its Standards Efficiency Review initiative. As a result of work under this initiative, and as discussed more fully in NERC’s filing filed concurrently with this notice,³ NERC has determined that it remains appropriate to retire the currently effective versions of the MOD A Reliability Standards, but without proposed Reliability Standard MOD-001-2 serving as a replacement standard. NERC has determined that the Requirements of proposed Reliability Standard MOD-001-2 are administrative in nature or relate expressly to commercial or business practices and would not advance reliability as originally contemplated.

Following approval by the NERC ballot body, the NERC Board of Trustees approved the retirement of the currently effective MOD A Reliability Standards and the withdrawal of proposed Reliability Standard MOD-001-2 on May 9, 2019. Additional information on the standards development process for these actions is available as **Exhibit F** to NERC’s filing filed this date.

³ See *Notice of Filing of the North American Electric Reliability Corporation of Revised and Retired Reliability Standards under the NERC Standards Efficiency Review*, filed this date. Further information about the NERC Standards Efficiency Review initiative is available here: <https://www.nerc.com/pa/Stand/Pages/Standards-Efficiency-Review.aspx>.

Respectfully submitted,

/s/ Shamai Elstein

Shamai Elstein
Assistant General Counsel, Legal and Regulatory
Lauren A. Perotti
Senior Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099 – facsimile
shamai.elstein@nerc.net
lauren.perotti@nerc.net

*Counsel for the North American Electric Reliability
Corporation*

June 20, 2019