
**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**North American Electric Reliability
Corporation**

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Docket No. RR20-2-000

**JOINT REPLY OF THE NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION AND SERC RELIABILITY CORPORATION TO COMMENTS OF
PUBLIC CITIZEN, INC.**

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limits on board composition, representation of industry segments or otherwise ensure adequate representation beyond the requirements already provided in Order No. 672 and section 215 of the FPA.”⁴

SERC’s proposed amended Bylaws are consistent with these requirements. SERC’s proposed Board would include sector representatives from entities that directly impact the reliability and security of the bulk power system, balanced with truly Independent Directors. SERC’s membership body, tasked with advising the Board on certain matters, includes a broader group than the sector representatives. It is comprised of representatives from each member company to ensure ample diverse perspectives and expertise in SERC’s activities. A consumer advocate could participate in SERC’s governance through the membership body which advises the Board. Participation in SERC’s governance is further enhanced through proposed Bylaws amendments, described in the December 20, 2019 Joint Petition, seeking to increase the transparency of its governance by posting dates and times of Board and Members meetings, meeting minutes, and meeting materials to its public website.

Consumer advocates have numerous opportunities for involvement at SERC outside of the membership body. Consumer advocates may participate in the Reliability Standards Development process through drafting teams. This requires registering as a potential ballot participant for voting on standards, and submitting requests to develop, modify, or withdraw a SERC Regional Reliability Standard.⁵ Consumer advocates could also engage in SERC’s various training and outreach efforts. Consumer advocates may also participate in technical committees so long as they can demonstrate the appropriate technical knowledge and experience required for the committee.

For the foregoing reasons, NERC and SERC respectfully request that the Commission

⁴ ERO Certification Order, at para. 544-45.

⁵ SERC Regional Reliability Standards Development Procedure, October 25, 2017.

approve the proposed amendments to the SERC Bylaws, as described in the December 20, 2019
Joint Petition.

Respectfully Submitted,

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