Comment to NERC ATCDT: NAESB BPS and ESS/ITS recommends the following approach to information that NERC feels should be publicly available:

- NERC should direct the development of information and documentation that is suitable for public availability and shall assign a name to such documentation and information.
- References to what will be made publicly available should be addressed only in the NAESB standards.
- NERC should communicate to NAESB in joint meetings there is a need for information to be publicly available.
- NAESB will develop standards for posting requirements and shall reference the document named in the NERC standard.

This will minimize the chance of a Transmission Provider being subject to two citations for violation of a posting requirement that is covered in both the NERC and NAESB standards. This would also reduce NERC's need to develop compliance requirements and measures for posting publicly available information.

Examples:
In the draft of MOD028:
R2: contingencies and assumptions shall be publicly available. This language could be modified to state: A document shall be prepared that is suitable for public distribution. The document shall be titled "x".
R3: list of points of receipt and delivery shall be publicly available. This language could be modified to state: TP shall maintain a list of points of receipt and delivery. NAESB will then draft posting requirements for this information.
R8: TTC shall be publicly available. This language could be modified to state: TP shall maintain a record of their TTCs. NAESB will then draft posting requirements for this information.
R16: ATC for each path shall be made publicly available. This language could be modified to state: TP shall maintain a record of ATC for each path. NAESB will then draft posting requirements for this information.