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

Complaint of George R. Cotter) **Docket No. EL21-105-000**
)
)
)
)
)

**MOTION TO INTERVENE AND COMMENT OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION**

Lauren Perotti
Senior Counsel
Candice Castaneda
Counsel
Marisa Hecht
Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099 – facsimile
lauren.perotti@nerc.net
candice.castaneda@nerc.net
marisa.hecht@nerc.net

*Counsel for the North American Electric
Reliability Corporation*

October 14, 2021

TABLE OF CONTENTS

I.	NOTICES AND COMMUNICATIONS	2
II.	MOTION TO INTERVENE.....	3
III.	EXECUTIVE SUMMARY	4
IV.	COMMENTS.....	6
A.	The Complaint Mischaracterizes the Proposals in the Cybersecurity Incentives NOPR.	6
B.	The Complaint is Incorrect Regarding its Allegations Regarding the Scope of NERC Reliability Standards and Regional Entity Activities.	9
C.	The Commission Should Deny the Complaint for Failure to Meet Commission Requirements.	10
D.	The Commission Should Deny the Complaint for Failure to Specify Requested Relief Within the Scope of Section 215(d)(5)(1) of the FPA.....	12
V.	CONCLUSION.....	13

activities. The Complaint includes errors describing NERC Critical Infrastructure Protection (“CIP”) and operations and planning Reliability Standards and seems to allege a gap in Reliability Standards based on these misunderstandings. In addition, the Complaint fails to meet the minimum requirements for filing a complaint under Commission rules and fails to present a request for relief within the scope of section 215(d)(5) of the FPA.

In these comments, NERC denies all allegations that can be reasonably ascertained in the Complaint and seeks to clarify the record. In addition, NERC explains why the Commission should deny the Complaint as inconsistent with Commission rules and section 215 of the FPA. As discussed below, NERC therefore moves to intervene and comment in response to the assertions in the Complaint and requests that the Commission deny the Complaint.

I. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the following:⁵

Lauren Perotti*
Senior Counsel
Candice Castaneda*
Counsel
Marisa Hecht*
Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099 – facsimile
lauren.perotti@nerc.net
candice.castaneda@nerc.net
marisa.hecht@nerc.net

⁵ Persons to be included on the Commission’s service list are identified by an asterisk. NERC respectfully requests a waiver of the Commission’s rules 18 C.F.R. § 385.203 (2016) to allow the inclusion of more than two persons on the service list.

II. MOTION TO INTERVENE

NERC has a substantial interest in this proceeding given the Complaint's focus on Reliability Standards. By enacting the Energy Policy Act of 2005,⁶ Congress entrusted the Commission with the duties of approving and enforcing rules to ensure the reliability of the Bulk-Power System ("BPS"), and with the duties of certifying an Electric Reliability Organization ("ERO") that would be charged with developing and enforcing mandatory Reliability Standards, subject to Commission approval. The Commission certified NERC as the ERO in 2006.⁷

As the ERO, NERC's mission is to assure the effective and efficient reduction of risks to the reliability and security of the grid.⁸ Under its FERC-approved Rules of Procedure, NERC develops Reliability Standards in accordance with Section 300 (Reliability Standards Development) of the NERC Rules of Procedure ("ROP") and the NERC Standard Processes Manual ("SPM").⁹ NERC and the Regional Entities are responsible for monitoring, assessing, and enforcing compliance with Reliability Standards in the United States in accordance with Section 400 (Compliance Enforcement) of the ROP and the NERC Compliance Monitoring and Enforcement Program ("CMEP").¹⁰

The Complaint invokes a provision of Section 215 of the FPA that may lead to a directive for NERC to act. In that provision, the Commission, upon its own motion or upon complaint, may

⁶ 16 U.S.C. § 824o.

⁷ *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g and compliance*, 117 FERC ¶ 61,126 (2006), *order on compliance*, 118 FERC ¶ 61,030, *order on compliance*, 118 FERC ¶ 61,190, *order on reh'g*, 119 FERC ¶ 61,046 (2007), *aff'd sub nom. Alcoa Inc. v. FERC*, 564 F.3d 1342 (D.C. Cir. 2009).

⁸ <https://www.nerc.com/AboutNERC/Pages/default.aspx>.

⁹ The NERC Rules of Procedure are available at <https://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>. The NERC Standard Processes Manual is available at https://www.nerc.com/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf.

¹⁰ *Id.* The NERC Compliance Monitoring and Enforcement Program is available at https://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/Appendix_4C_CMEP_06082018.pdf.

order NERC to submit a new or proposed Reliability Standard.¹¹ Furthermore, the Complaint makes erroneous, baseless, assertions regarding NERC Reliability Standards and activities. As a result, no other party can adequately represent NERC's interests or adequately respond to Complainant's allegations against NERC. Therefore, NERC requests that the Commission grant this motion to intervene and comment as within the public interest.

III. EXECUTIVE SUMMARY

The Complaint was originally filed in the Commission's Cybersecurity Incentives rulemaking proceeding (Docket No. RM21-3-000) and may, in fact, be intended as an out-of-time supplement to previous comments from the Complainant in that docket. Invoking 16 U.S.C. § 824o(d)(5),¹² the Complaint seeks to prevent the issuance of a final rule in the Cybersecurity Incentives rulemaking proceeding.¹³ Citing a list of unsupported alleged wrongdoings, including prior Commission orders approving Reliability Standards, the Complaint asserts that "the nation is a victim of [FERC's, NERC's, and industry's] combined efforts to defeat the [Energy Policy Act] of 2005 which legislated mandatory cybersecurity standards for Bulk Power Systems Operations and interconnected Distribution Systems involved in Real-Time Power Flows."¹⁴ The

¹¹ Section 215(d)(5) of the FPA provides:

The Commission, upon its own motion or upon complaint, may order the Electric Reliability Organization to submit to the Commission a proposed reliability standard or a modification to a reliability standard that addresses a specific matter if the Commission considers such a new or modified reliability standard appropriate to carry out this section.

¹² 16 U.S.C. §824o(d)(5) (providing "The Commission, upon its own motion or upon complaint, may order the Electric Reliability Organization to submit to the Commission a proposed reliability standard or a modification to a reliability standard that addresses a specific matter if the Commission considers such a new or modified reliability standard appropriate to carry out this section.").

¹³ Complaint at p. 2. The Complaint states that it is being brought under 16 U.S.C. § 824o(d)(5)1, however, there is no sub-section 1 in 16 U.S.C. § 824o(d)(5). In its Comments, NERC will also refer to this provision as Section 215(d)(5) of the FPA.

¹⁴ Complaint at p. 9.

Compliant offers a number of policy “solutions” to the alleged wrongs identified in the Complaint.¹⁵

As the Commission-certified ERO, NERC takes seriously its role in assuring the effective and efficient reduction of risks to the reliability and security of the North American BPS. This includes NERC’s statutory role to establish and enforce a robust suite of Reliability Standards, subject to Commission oversight. In its orders approving NERC’s proposed Reliability Standards, the Commission has found that they are “just, reasonable, not unduly discriminatory, and in the public interest.”¹⁶ NERC disagrees with the Complaint’s collateral attack that the Commission erred in its prior proceedings to approve CIP Reliability Standards proposed by NERC and observes that the time to seek rehearing on such matters is long past.¹⁷ Further, the Complaint appears to rely on a fundamental misunderstanding of NERC’s Reliability Standards framework, including the role of the Regional Entities and regional variances.

As discussed herein, the Complaint fails to meet the minimum requirements for filing a complaint, appears to rely on a fundamental misunderstanding of the NERC Reliability Standards development process, and does not appear to seek a standards-based remedy to support a complaint

¹⁵ Complaint at pp. 11-12 (Complaint Solutions, Petition for Change).

¹⁶ See 16 U.S.C. § 824o(d)(2) (“The Commission may approve, by rule or order, a proposed reliability standard or modification to a reliability standard if it determines that the standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest...”).

¹⁷ 18 C.F.R. § 385.713(b) (stating, “[a] request for rehearing by a party must be filed not later than 30 days after issuance of any final decision or other final order in a proceeding.”). See also, *New England Conference of Pub. Utils. Comm’rs, Inc. v. Bangor Hydro-Elec. Co.*, 124 FERC ¶ 61,291 (2008), *order on reh’g*, 135 FERC ¶ 61,140 P 27 (2011) (stating, “A collateral attack is ‘[a]n attack on a judgment in a proceeding other than a direct appeal’ and is generally prohibited. Disfavor for collateral attacks is embodied in the doctrine of collateral estoppel: once a court or adjudicative body has decided an issue of fact or law necessary to its judgment, that decision may preclude relitigation of the issue in a suit on a different cause of action involving a party to the first case.”) (*Oregon v. Guzek*, 546 U.S. 517, 526-27 (2006) (“The law typically discourages such collateral attacks”) (citing *Allen v. McCurry*, 449 U.S. 90, 94 (1980) (“As this Court and other courts have often recognized, res judicata and collateral estoppel relieve parties of the cost and vexation of multiple lawsuits, conserve judicial resources, and, by preventing inconsistent decisions, encourage reliance on adjudication.”))).

proceeding brought under Section 215(d)(5) of the FPA. For these reasons, NERC moves to intervene and comment in response to the Complainant's assertions and recommendations and requests that the Commission deny the Complaint.

IV. COMMENTS

As discussed more fully below, NERC submits comments to: (i) correct the Complaint's mischaracterizations of the Cybersecurity Incentives NOPR and NERC activities (Sections IV.A. and B.); and (ii) requests that the Commission deny the Complaint for both failure to meet the minimum requirements applicable to complaints under the Commission's Rules of Practice and Procedure,¹⁸ and failure to submit a request within the scope of section 215(d)(5) of the FPA (Sections IV.C. and D).

A. The Complaint Mischaracterizes the Proposals in the Cybersecurity Incentives NOPR.

As the Complaint was originally filed in Docket No. RM21-3-000 regarding the Commission's pending Cybersecurity Incentives NOPR and may be intended as an out-of-time supplement to the Complainant's comments in that proceeding, NERC provides a brief clarification of the NOPR and response to the Complainant's indicated concern regarding the NOPR's impact on NERC Reliability Standards. Clarification is particularly warranted as the Complaint mischaracterizes the Cybersecurity Incentives NOPR and appears to fundamentally misunderstand its potential impact to NERC Reliability Standards.

Under the Cybersecurity Incentives NOPR, the Commission proposes granting incentives for cybersecurity investments.¹⁹ Public utilities must apply by filing for Commission approval

¹⁸ See, 18 C.F.R. § 385.206.

¹⁹ NOPR at PP 38-47 (including, (1) an increase in the return on equity applicable to certain cybersecurity investments; (2) deferred cost recovery for certain cybersecurity investments; and (3) other cybersecurity incentives, on a case-by-case basis, if they are just and reasonable and not unduly discriminatory or preferential).

pursuant to section 205 of the FPA and receive such approval prior to implementing the proposed incentives in its Commission-jurisdictional rates and should make annual informational filings thereafter.²⁰

The Commission proposes two approaches to applications by entities seeking incentives. The first approach involves demonstrating a voluntary investment in measures beyond the applicable requirements of CIP Reliability Standards. The Commission proposes two ways for a public utility to demonstrate that it is eligible for a cybersecurity incentive under the proposed CIP approach: (1) the medium/high incentive; and (2) the hub-spoke incentive.²¹ Under the medium/high incentive, a public utility may receive incentive rate treatment for voluntarily applying requirements for medium or high impact Bulk Electric System (“BES”) Cyber Systems to low impact BES Cyber Systems or by applying the requirements for high impact BES Cyber Systems to medium impact BES Cyber Systems. Under the hub-spoke incentive, a public utility would receive incentive rate treatment for voluntarily ensuring that all routable protocol to and from the low impact BES Cyber System connects to a high or medium impact BES Cyber System. Through this approach, communications to and from the low impact BES Cyber System would inherit the controls applied to the higher impact BES Cyber Systems. These public utilities would receive a rebuttable presumption that the investments materially enhance the public utility’s cybersecurity posture.

The second approach involves demonstrating cybersecurity investments that implement security controls from the National Institute of Standards and Technology (“NIST”) Framework.

²⁰ *Id.* at PP 48-49.

²¹ *Id.* at PP 22-29.

The Commission proposes to limit the types of controls to those that are “most likely to provide a significant benefit to the cybersecurity of Commission-jurisdictional transmission facilities, not just the BES.”²² Entities applying for incentives under the NIST Framework approach must demonstrate that these controls go above and beyond those required by the CIP Reliability Standards.²³

This explanation of the Commission’s Cybersecurity Incentives NOPR demonstrates that the Commission’s proposals do not seek to supersede or eradicate mandatory and enforceable NERC Reliability Standards approved by the Commission in accordance with section 215 of the FPA and the NERC ROP. Those Reliability Standards have been, and will continue to be, developed through the transparent and open process (i) required under NERC’s ROP; (ii) demonstrated by NERC Reliability Standard postings and transparent activities; and (iii) evidenced in each of NERC’s Reliability Standard petitions for approval filed with the Commission.

Compliance with NERC Reliability Standards is monitored and enforced under the NERC CMEP, in accordance with section 215 of the FPA and the NERC ROP. Notices of Penalty are filed with the Commission for its approval and are posted on NERC’s website. Similar to Reliability Standards development, NERC’s Compliance and Enforcement webpages provide transparent and expansive insight into CMEP activities and include a tabulation of enforcement actions by year.²⁴ Nothing in the Cybersecurity Incentives NOPR appears to

²² *Id.* at P 33.

²³ *Id.* at P 36.

²⁴ *See*, 16 U.S.C. §824o; Sections 300 and 400, and Appendices 3A and 4C of the NERC ROP; NERC Website, Reliability Standards webpage; *and* NERC Website, Compliance and Enforcement webpages.

propose changing the regulatory framework applicable to mandatory and enforceable Reliability Standards.

B. The Complaint is Incorrect Regarding its Allegations Regarding the Scope of NERC Reliability Standards and Regional Entity Activities.

The Complaint appears to assert that NERC Reliability Standards do not properly address operations and real-time power flows. Specifically, the Complaint alleges that the CIP Reliability Standards are mutually exclusive of those requirements that govern operations and real-time power flows. Further, the Complaint alleges that this separation permits the Regional Entities to “control” operations and real-time power flows. The Complaint also seems to take issue with present regulatory treatment for synchrophasors.

These assertions reflect complete misunderstanding of NERC Reliability Standards and Regional Entity activities in relation to those standards. Contrary to the Complaint’s assertions, NERC Reliability Standards consist of a single body of standards intended to assure the reliability and security of the BPS. NERC Reliability Standards are developed using a results-based approach that focuses on performance, risk management, and entity capabilities. There are fewer than 20 regional variations in effect across North America, all of which were first approved by NERC before their submission to the applicable governmental authorities for approval.²⁵

Without reproducing the extensive material posted on NERC’s webpage, NERC provides three descriptions of its Reliability Standards for illustrative purposes. These examples quickly

²⁵ NERC’s Reliability Standards, including regional standards and variances, are available on NERC’s webpage at <https://www.nerc.com/pa/Stand/Pages/ReliabilityStandards.aspx>.

illustrate the manner in which NERC Reliability Standards, address operations and real-time power flows. Three examples are as follows:

- i) Reliability Standard EOP-005-3 (System Restoration from Blackstart Resources), designed to ensure plans, Facilities, and personnel are prepared to enable System restoration from Blackstart Resources to ensure reliability is maintained during restoration and priority is placed on restoring the Interconnection. *See, e.g.,* Requirement R6 and Measure M6.
- ii) Reliability Standard MOD-001-1a (Available Transmission System Capability), designed to ensure that calculations are performed by Transmission Service Providers to maintain awareness of available transmission system capability and future flows on their own systems as well as those of their neighbors. *See, e.g.,* Requirements R1 and R2 and Measures M1 and M2.
- iii) Reliability Standard MOD-033-2 (Steady-State and Dynamic System Model Validation), designed to establish consistent validation requirements to facilitate the collection of accurate data and building of planning models to analyze the reliability of the interconnected transmission system. *See, e.g.,* Requirement R1.

**Please see the Complete Set of NERC Reliability Standards available at NERC's Website for further examples.*

With regard to synchrophasors, the Complaint does not allege with specificity the Complainant's concerns regarding synchrophasors. As such, NERC cannot provide specific comments on this issue, apart from denying any indication that synchrophasors would be categorically exempt from the scope of CIP Reliability Standards.

C. The Commission Should Deny the Complaint for Failure to Meet Commission Requirements.

The Commission should deny the Complaint because it fails to meet the minimum requirements applicable to complaints under the Commission's Rules of Practice and

Procedure.²⁶ Under Rule 203 of the Commission’s Rules of Practice and Procedure, pleadings must set forth the basis in fact and law for the positions taken.²⁷ Rule 206 provides eleven elements that a complaint must contain, including the following, among others: (a) clearly identify the alleged action or inaction claimed to violate applicable statutory or regulatory requirements, (b) set forth the business, commercial, economic, or other issues presented by the action or inaction “as such relate to or affect the complainant,” (c) indicate the practical, operational, or other nonfinancial impacts imposed as a result of the action or inaction, including, where applicable, the environmental, safety, or reliability impacts of the action or inaction; and (d) state the specific relief or remedy requested, and the basis for that relief.²⁸ Long-standing Commission precedent provides that “rather than bald allegations, [a complainant] must make an adequate proffer of evidence including pertinent information and analysis to support its claims.”²⁹

The Complaint fails to meet these requirements. In particular, the Commission should deny the Complaint as it fails to set forth the basis in fact and law for the positions taken and fails to demonstrate the existence of any action or inaction that is inconsistent with applicable laws subject to Commission jurisdiction.

²⁶ See 18 C.F.R. § 385.206.

²⁷ 18 C.F.R. § 385.203(a)(7).

²⁸ 18 C.F.R. § 385.206(b) (listing the full list of elements for a complaint) (NERC does not waive objection to the Complaint’s failure to meet other elements of a properly pleaded complaint but is simply highlighting these elements); *Complaint of Michael Mabee Related to Reliability Standards*, Order Denying Complaint, 175 FERC ¶ 61,163, at P 14 (2021).

²⁹ *Ill. Mun. Elec. Agency v. Cent. Ill. Pub. Serv. Co.*, Order Dismissing Complaint Without Prejudice, 76 FERC ¶ 61,084 at 4 (1996); *CALifornians for Renewable Energy, Inc., (CARE) and Barbara Durkin v. Nat’l Grid, Cape Wind, and the Mass. Dep’t of Pub. Util.*, Order Dismissing Complaint, 137 FERC ¶ 61,113, at PP 2, 31-32 (2011); *CALifornians for Renewable Energy, Inc., Michael E. Boyd, and Robert M. Sarvey v. Pac. Gas and Elec. Co.*, Order Dismissing Complaint, 143 FERC ¶ 61,005 at P 2 (2013); and *Citizens Energy Task Force and Save Our Unique Lands v. Midwest Reliability Org., et al.*, Order Dismissing Complaint, 144 FERC ¶ 61,006, at P 38 (2013).

While the Complaint cites to section 215 of the FPA, the Complaint does not provide any proof or analysis to support its allegations and fails to specify how the alleged actions or inactions, even if true, would violate section 215 of the FPA. NERC will not address all of the unsupported allegations in the Complaint but observes that the Complaint appears to rely on several misunderstandings of NERC's Reliability Standards and activities corrected in Sections IV.A. and B. above.

Additionally, the Complaint appears to assert that safeguarding CIP noncompliance information or cyber-attacks from public disclosure where there is potential for bad actors to exploit vulnerabilities and threaten the security of the grid, constitutes evidence that the compliance monitoring and enforcement of the CIP Reliability Standards is deficient.³⁰ NERC denies this baseless allegation in its entirety.³¹

D. The Commission Should Deny the Complaint for Failure to Specify Requested Relief Within the Scope of Section 215(d)(5)(1) of the FPA.

The Complaint states that is brought under Section 215(d)(5) of the FPA. This provision states:

The Commission, upon its own motion or upon complaint, may order the Electric Reliability Organization to submit to the Commission a proposed reliability standard or a modification to a reliability standard that addresses a specific matter if the Commission considers such a new or modified reliability standard appropriate to carry out this section.³²

³⁰ Complaint, at p. 10.

³¹ NERC also highlights materials, such as the Industry Advisory Modular Malware Targeting Electric Industry Assets in Ukraine, Initial Distribution June 13, 2017, *available at*, https://www.nerc.com/pa/rrm/bpsa/Alerts%20DL/NERCAalert_A-2017-06-13-01_Modular-Electric-Industry-Malware.pdf (reflecting that NERC does not inappropriately suppress information and strives for responsible transparency).

³² 16 U.S.C. § 824o(d)(5).

Despite stating that it is being brought under this provision, however, the relief requested by the Complainant does not appear to seek development of revised Reliability Standards to address a specific matter under section 215 of the FPA. The Complaint offers broad, abstract, policy “Complaint Solutions, Petition for Change”³³ and indicates the Commission should not adopt its Cybersecurity Incentive proposals, which the Commission proposes to adopt pursuant to its authority under section 205 and 206, rather than section 215, of the FPA.

Further, to the extent the Complaint seeks to re-litigate matters decided in prior Commission orders approving CIP or operations and planning Reliability Standards, NERC notes that the time for seeking rehearing is long past. The Commission’s rules provide that requests for rehearing are due within 30 days after a final decision. As the Commission has stated “A collateral attack is ‘[a]n attack on a judgment in a proceeding other than a direct appeal’ and is generally prohibited....”³⁴ The Commission should therefore deny the Complaint as outside the scope of section 215(d)(5) of the FPA, for failure to identify a specific reliability issue with proposed modifications to NERC Reliability Standards.

V. CONCLUSION

WHEREFORE, for the reasons stated above, NERC respectfully requests that the Commission grant this motion to intervene, accept the comments herein, and deny the Complaint.

³³ Complaint, at pp. 11-12.

³⁴ See, 18 C.F.R. § 385.713(b)(stating, “[a] request for rehearing by a party must be filed not later than 30 days after issuance of any final decision or other final order in a proceeding.”). See also, *New England Conference of Pub. Utils. Comm’rs, Inc. v. Bangor Hydro-Elec. Co.*, 124 FERC ¶ 61,291 (2008), *order on reh’g*, 135 FERC ¶ 61,140, P 27 (2011) (adding, “[d]isfavor for collateral attacks is embodied in the doctrine of collateral estoppel: once a court or adjudicative body has decided an issue of fact or law necessary to its judgment, that decision may preclude relitigation of the issue in a suit on a different cause of action involving a party to the first case.”) (*citing Oregon v. Guzek*, 546 U.S. 517, 526-27 (2006) (“The law typically discourages such collateral attacks”) (*citing Allen v. McCurry*, 449 U.S. 90, 94 (1980) (“As this Court and other courts have often recognized, res judicata and collateral estoppel relieve parties of the cost and vexation of multiple lawsuits, conserve judicial resources, and, by preventing inconsistent decisions, encourage reliance on adjudication.”))).

Respectfully submitted,

/s/ Candice Castaneda

Lauren Perotti
Senior Counsel
Candice Castaneda
Counsel
Marisa Hecht
Counsel
North American Electric Reliability
Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099 – facsimile
lauren.perotti@nerc.net
candice.castaneda@nerc.net
marisa.hecht@nerc.net

*Counsel for the North American Electric
Reliability Corporation*

Date: October 14, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of this document upon all parties listed on the official service list compiled by the Secretary in the above-captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Washington, D.C., this 14th day of October, 2021.

/s/ Candice Castaneda

Candice Castaneda
*Counsel for the North American Electric
Reliability Corporation*