

Draft 1 2018 BP&B Comments Sent via Email by Barry Lawson on Behalf of NRECA

Please see the following bullets for NRECA's comments:

- Page 11 – section on Ongoing Focus on Cost Control and Efficiency – NRECA appreciates the efforts by NERC and the Regional Entities in this area; however, we encourage NERC and the REs to not only reallocate existing resources, but to also consider not refilling positions that become vacant if they are not needed.
- Page 12 – section on Overview of 2018 Budget and Funding Requirements – NRECA understands the importance of maintaining an adequate Assessment Stabilization Reserve; however, we also believe it's important for NERC and the REs to achieve a stable budget and industry assessment for the first time in consecutive years. We encourage NERC and the REs to reconsider using the reserve to at least partially offset the increased assessments for 2018. Additionally, we recommend that NERC and the REs develop more detailed criteria and increased transparency on how it is determined when the reserve is used to offset budget and assessment increases.
- Page 88 – Table B-4 – Personnel – NRECA requests that NERC and the REs provide a basis/demonstration of whether the cost per FTE (salaries and total) is reasonable and how it measures against similar level positions in Atlanta and Washington, DC. As presented in the budget documents, it is quite challenging to make an independent judgment on these issues.

NRECA appreciates the opportunity to provide these comments. Additionally, we want to acknowledge the NERC Enterprise's continued efforts in providing increased transparency and detailed budget documents for stakeholder review.

Please contact me if you have any questions.