

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

**Standards for Business Practices and
Communication Protocols for Public
Utilities**)
)
)

Docket No. RM05-5-026

**COMMENTS OF THE NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION IN SUPPORT OF NOTICE OF PROPOSED RULEMAKING**

The North American Electric Reliability Corporation (“NERC”) hereby provides comments in support of the Federal Energy Regulatory Commission (“Commission”) Notice of Proposed Rulemaking (“NOPR”) to revise the Commission’s regulations at 18 CFR § 38.1(b) to remove the incorporation by reference of Wholesale Electric Quadrant WEQ-006 Time Error Correction Business Practice Standards (“WEQ-006”) as adopted by the North American Energy Standards Board (“NAESB”) in its WEQ Version 003.0 Businesses Practice Standards.¹

Notices and communications with respect to these comments may be addressed to:

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I. COMMENTS

NERC supports the NOPR and NAESB’s reservation, or retirement, of WEQ-006.

NAESB reserved WEQ-006 in coordination with NERC’s retirement of Reliability Standard

¹ *Standards for Business Practices and Communication Protocols for Public Utilities*, 165 FERC ¶ 61,007 (2018) (“NOPR”) (proposing to also incorporate by reference NAESB Standard WEQ-000 (Version 0003.2), eliminating the definitions of “Time Error” and “Time Error Correction” and making other minor edits.).

BAL-004-0 (*Time Error Correction*), as approved by the Commission in 2017.² As referenced in the NOPR³ and detailed in NERC's petition for retirement of Reliability Standard BAL-004-0, coordinated retirement of WEQ-006 and Reliability Standard BAL-004-0 ensures clarity and avoids inadvertent, uncoordinated, manual time error correction.⁴

On March 27, 2017, NAESB filed a status report with the Commission regarding the reservation of WEQ-006.⁵ Consistent with NERC's filed and Commission approved Implementation Plan, NERC then retired Reliability Standard BAL-004-0 effective April 1, 2017. Removing the reference to WEQ-006 in 18 CFR § 38.1(b)) will support reliability by ensuring clarity and avoiding uncoordinated manual time error correction.

II. CONCLUSION

NERC respectfully requests that the Commission accept these comments in support of the Notice of Proposed Rulemaking.

² *North American Electric Reliability Corporation*, Docket No. RD17-1-000 (Letter Order Jan. 18, 2017).

³ *See*, NOPR, at P 7.

⁴ *Petition of the North American Electric Reliability Corporation for Retirement of Reliability Standard BAL-004-0*, Docket No. RD17-1-000 (filed Nov. 10, 2016).

⁵ *Status Report of the North American Energy Standards Board on the reservation of WEQ-006 Manual Time Error Correction Business Practice Standards under RM05-5, et al.*, Docket Nos. RD17-1-000 and RM05-5-000 (filed Mar. 27, 2017).

Respectfully submitted,

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Date: October 24, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service lists compiled by the Secretary in Docket No. RM05-5-026.

Dated at Washington, DC this 24th day of October 2018.

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