

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

Revisions to Electric Reliability Organization Definition of Bulk Electric System And Rules of Procedure)	Docket Nos. RM12-6-000 RM12-7-000
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**COMPLIANCE FILING OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION**

Pursuant to Order No. 773¹ of the Federal Energy Regulatory Commission (“FERC” or the “Commission”), the North American Electric Reliability Corporation (“NERC”) is submitting a schedule outlining how and when it will modify Exclusion E3 of the Bulk-Electric System definition (“BES Definition”) to remove the 100 kV minimum operating voltage in the local network definition.²

I. Proposed Schedule

The proposed schedule, included herein as **Exhibit A**, is predicated upon issuance of a Commission order on rehearing. Order No. 773 is currently subject to pending motions for clarification and/or rehearing, including the Commission directive at P 199 to modify Exclusion E3.³ Without Commission resolution of this issue, it would be premature for NERC to modify

¹ *Revisions to Electric Reliability Organization Definition of Bulk Electric System and Rules of Procedure*, Order No. 773, 141 FERC ¶ 61,236 (2012).

² Order No. 773 at P 199 (“we direct NERC to modify exclusion E3 to remove the 100 kV minimum operating voltage in the local network definition. Within 30 days of the effective date of this Final Rule, we direct NERC to submit a schedule outlining how and when it will make the modification to the definition.”).

³ See e.g., *Request for Rehearing of the American Public Power Association*, Docket Nos. RM12-6-001 and RM12-7-001 at 5 (January 22, 2013) (“The Commission erred by directing NERC to modify Exclusion E3 to remove the 100 kV minimum operating voltage, contrary to Section 215(d)(5) of the FPA.”); *Request for Rehearing and Clarification of Transmission Access Policy Study Group and Electricity Consumers Resource Council*, Docket Nos. RM12-6-001 and RM12-7-001 (January 22, 2013) at 3 (“The Final Rule’s directive to modify Exclusion E3 to remove the 100 kV minimum operating voltage is arbitrary and contrary to the requirements of Section 215 of the Federal Power Act.”); *Motion for Clarification, or in the Alternative, Request for Rehearing of the National Rural Electric Cooperative Association*, Docket Nos. RM12-6-001 and RM12-7-001 at 2 (January 22, 2013) (“the

the language of Exclusion E3. Phase 1 of the BES Definition is effective as of July 1, 2013, therefore, any directed modifications to Exclusion E3 will likely be implemented through the NERC Reliability Standards development process as part of Phase 2 of the BES Definition Project.

II. CONCLUSION

For the reasons stated above, NERC respectfully requests that the Commission accept the proposed schedule as compliant with the Commission's directive.

Respectfully submitted,

/s/ Stacey Tyrewala

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Dated: April 4, 2013

Commission should clarify that its directive to implement exclusion E1 and criterion (a) of exclusion E3 relating to generator tie-lines is a directive that applies to the ongoing Phase 2 BES definition work.”).

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 4th day of April, 2013.

/s/ Stacey Tyrewala
Stacey Tyrewala

*Counsel for North American Electric
Reliability Corporation*

EXHIBIT A**BES Definition Phase 2 Action Plan**

Effort	Task	Description	Lead Organization	Deliverables	Estimated Completion
<i>FERC Order</i>	Respond to request for rehearing and clarification	FERC received a number of requests for rehearing and/or clarification from industry in addition to the clarification request from NERC. FERC issued a tolling order which acknowledges receipt of said requests while giving FERC an indeterminate amount of time to actually respond.	FERC	Response to requests for rehearing. Response to requests for clarification. Issuance of final Order.	TBD TBD TBD
<i>Internal Standards Process Preparation</i>	Develop Supplemental SAR	The Phase 2 SAR wasn't designed to allow the SDT to respond to FERC directives for Phase 1. A Supplemental SAR is needed to provide the SDT with the authority to take such actions.	Standards SDT	Draft Supplemental SAR	Complete
	Approve Supplemental SAR	The Standards Committee must approve a Supplemental SAR.	Standards Committee	Supplemental SAR	Complete
	Post Supplemental SAR	Post the approved Supplemental SAR on the project web page.	Standards	Supplemental SAR	Complete

EXHIBIT A

Effort	Task	Description	Lead Organization	Deliverables	Estimated Completion
<i>Formal Definition Development</i>	Phase 2 clarification items	As per Phase 2 SAR, make necessary clarifications to definition	SDT	Revised definition	Complete
	Phase 2 technical justification study	As per directions from the Standards Committee and the Board of Trustees, the Planning Committee is to provide technical justifications for Phase 1 threshold values	Planning Committee	Final Planning Committee report	Complete
	Phase 2 technical justification items	As per Phase 2 SAR, SDT to make necessary revisions to threshold values based on Planning Committee report	SDT	Revised definition	April 30, 2013 (tentative – based on delivery of final Planning Committee report no later than March 31, 2013)
	Response to FERC directives	Provide necessary changes to Phase 2 definition based on FERC Order and directives	SDT	Revised definition	60 days after FERC action on requests for rehearing and clarification of Order 773
<i>Formal Development Process</i>	Post revised definition	Initial posting for 45 days with parallel ballot	SDT Standards	Definition and supporting documents	75 days after FERC action on requests for rehearing and clarification of Order 773
	Respond to comments Revise definition	Respond to comments from initial posting. Revise definition as necessary.	SDT	Consideration of Comments document Revised definition	120 days after FERC action on requests for rehearing and clarification of Order 773
	Successive post of revised definition	Successive posting for 30 days with parallel ballot	SDT Standards	Definition and supporting documents	150 days after FERC action on requests for rehearing and clarification of Order 773

EXHIBIT A

Effort	Task	Description	Lead Organization	Deliverables	Estimated Completion
	Respond to comments Revise definition	Respond to comments from 30 day successive posting. Revise definition as necessary.	SDT	Consideration of Comments document Revised definition	180 days after FERC action on requests for rehearing and clarification of Order 773
	Recirculation posting of revised definition	Recirculation ballot for 10 days	SDT Standards	Definition and supporting documents	200 days after receipt of final FERC action on requests for rehearing and clarification of Order 773
	Obtain Board of Trustees approval	Obtain approval to file Phase 2 definition	Standards	Agenda package	200 days after receipt of final posting plus delay to meeting date
	File	Submit final filing package	Legal	Final Filing Package	