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

Monitoring System Conditions -)	Docket Nos. RM13-12-000
Transmission Operations Reliability)	RM13-14-000
Standard)	RM13-15-000
Transmission Operations Reliability)	
Standards)	
Interconnection Reliability Operations and)	
Coordination Reliability Standards)	

NOTICE OF WITHDRAWAL OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Pursuant to Rule 216¹ of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("FERC" or the "Commission"), the North American Electric Reliability Corporation ("NERC") hereby submits this notice of withdrawal of its changes to the Transmission Operations ("TOP") Reliability Standards and Interconnection Reliability Operations and Coordination ("IRO") Reliability Standards filed in Docket Nos. RM13-12-000,² RM13-14-000,³ and RM13-15-000.⁴

I. **Background**

On November 21, 2013, the Commission issued a Notice of Proposed Rulemaking ("TOP/IRO NOPR")⁵ proposing to approve TOP-006-3 and remand the revised TOP and IRO

18 C.F.R. § 385.216 (2014).

On April 4, 2013, in Docket No. RM13-12-000, NERC proposed revisions to Reliability Standard TOP-006-3 to divide the reporting responsibilities of Balancing Authorities and Transmission Operators into separate requirements.

On April 16, 2013, in Docket No. RM13-14-000, NERC submitted for Commission approval three revised TOP Reliability Standards: TOP-001-2 (Transmission Operations), TOP-002-3 (Operations Planning), TOP-003-2 (Operational Reliability Data), and one Protection and Control ("PRC") Reliability Standard, PRC-001-2 (System Protection Coordination) to replace the eight currently-effective TOP standards.

On April 16, 2013, in Docket No. RM13-15-000, NERC submitted for Commission approval four revised IRO Reliability Standards: IRO-001-3 (Responsibilities and Authorities), IRO-002-3 (Analysis Tools), IRO-005-4 (Current Day Operations), and IRO-014-2 (Coordination Among Reliability Coordinators).

Monitoring System Conditions- Transmission Operations Reliability Standard Transmission Operations Reliability Standards Interconnection Reliability Operations and Coordination Reliability Standards, 145 FERC ¶ 61,158 (2013) ("TOP/IRO NOPR").

Reliability Standards. In the TOP/IRO NOPR, the Commission raised, among its concerns, that NERC "has removed critical reliability aspects that are included in the currently-effective standards without adequately addressing these aspects in the proposed standards."⁶

On December 20, 2013, NERC filed a motion requesting that the Commission defer action, until January 31, 2015, to allow NERC time to consider the reliability concerns raised by the Commission in the TOP/IRO NOPR and revise the proposed Reliability Standards as necessary. On January 14, 2014, the Commission granted NERC's motion to defer action.⁷

II. Notices and Communications

Notices and communications with respect to this filing may be addressed to the following:⁸

Holly A. Hawkins*
Associate General Counsel
Shamai Elstein*
Senior Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099 – facsimile
charlie.berardesco@nerc.net
holly.hawkins@nerc.net
shamai.elstein@nerc.net

Valerie Agnew
Senior Director of Standards
North American Electric Reliability Corporation
3353 Peachtree Road, N.E.
Suite 600, North Tower
Atlanta, GA 30326
(404) 446-2560
(404) 446-2595 – facsimile
valerie.agnew@nerc.net

III. Support for Withdrawal

Since the issuance of the TOP/IRO NOPR, NERC developed revisions to the TOP and IRO Reliability Standards in Project 2014-03, which were approved by the NERC Board of Trustees on November 13, 2014 and February 11, 2015. Concurrent with this Motion to

⁶ TOP/IRO NOPR at P 4.

Monitoring System Conditions - Transmission Operations Reliability Standard, Transmission Operations Reliability Standards, Interconnection Reliability Operations and Coordination Reliability Standards, 146 FERC ¶ 61,023 (2014).

Persons to be included on the Commission's service list are indicated with an asterisk. NERC requests waiver of 18 C.F.R. § 385.203(b) to permit the inclusion of more than two people on the service list.

Withdraw, these revised TOP and IRO Reliability Standards have been filed with the Commission.

IV. Conclusion

NERC requests that the Commission permit withdrawal of NERC's petitions, either by order or expiration of the fifteen (15) day period in Rule 16.

Respectfully submitted,

/s/ Shamai Elstein
Shamai Elstein
Senior Counsel
North American Electric Reliability Corporation
1325 G St., NW
Washington, DC 20005
202-400-3000
shamai.elstein@nerc.net

Counsel for the North American Electric Reliability Corporation

Dated: March 18, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this submittal upon all parties listed on the official service lists compiled by the Secretary in this proceeding in Docket Nos. RM13-12-000, RM13-14-000, and RM13-15-000.

Dated at Washington, D.C. this 18th day of March, 2015.

/s/ Shamai Elstein

Shamai Elstein

Counsel for North American Electric Reliability Corporation