



June 30, 2010

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Re: North American Electric Reliability Corporation, Docket Nos. RR06-1-016 and RR06-1-017

Delegation Agreement Between the North American Electric Reliability Corporation and Northeast Power Coordinating Council, Inc., Docket Nos. RR07-3-004 and RR07-3-005

Dear Ms. Bose:

In response to Paragraph 94 of the Federal Energy Regulatory Commission's (FERC or the Commission) December 19, 2008 Order,¹ the North American Electric Reliability Corporation (NERC), on behalf of itself and the Northeast Power Coordinating Council, Inc. (NPCC) hereby submits this compliance filing. The Commission directed NERC and NPCC to submit a filing regarding NPCC's use of technical committee consultations. The Commission directed:

NERC and NPCC to submit non-public reports to the Commission staff on technical committee consultations during that calendar quarter that list: (i) the topic of each consultation initiated or continued during that quarter; (ii) the date on which the consultation began and ended; (iii) the reason why NPCC's staff initiated the consultation; (iv) the persons who participated in the consultation; and (v) the result of the consultation, if any. Finally, we require NERC and NPCC to submit a filing on or before June 30, 2010 that incorporates the results of these quarterly reports and proposes a schedule for the termination of the consultations or a detailed justification for their continuation.

¹ *North American Electric Reliability Corporation*, "Order Accepting Compliance Filings, Subject to Conditions," 125 FERC ¶ 61,330 (2008).

NERC submitted NPCC's quarterly reports regarding technical committee consultations to FERC on May 4, 2009, July 30, 2009, October 27, 2009, January 26, 2010 and May 7, 2010.² All five of the quarterly reports indicated that NPCC did not initiate any technical committee consultations. NPCC also reports that it did not make use of technical committee consultations for compliance purposes during the second quarter 2010.

Additionally, on June 9, 2010, NERC submitted a filing containing Revised Regional Delegation Agreements.³ Among other proposed changes, the provision regarding the use of technical committee consultations in the enforcement process was deleted from Section 3.0 – Other Decision-Making Bodies of Exhibit D – Compliance Monitoring and Enforcement Program to the NPCC Delegation Agreement.⁴ Further, pending approval of the NPCC Revised Regional Delegation Agreement, NPCC states it will not make use of technical committee consultations for compliance purposes.

Upon Commission approval of the June 9, 2010 filing and the revised NPCC Regional Delegation Agreement, the provision regarding technical committee consultation will be eliminated. Under the circumstances, NERC respectfully requests that the Commission terminate the quarterly reporting requirement.

Accordingly, NERC respectfully requests that the Commission accept this filing and terminate the quarterly reporting requirement.

Respectfully submitted,

/s/ Rebecca J. Michael

Rebecca J. Michael

*Attorney for North American Electric
Reliability Corporation*

cc: Official service list in Docket Nos. RR06-1-016, RR06-017, RR07-3-004 and RR07-3-005

² These are the dates the reports were submitted to FERC. The following dates are the dates NPCC submitted the information to NERC: April 29, 2009; July 30, 2009; October 27, 2009; January 26, 2010 and April 30, 2010

³ *North American Electric Reliability Corporation*, "Petition for Approval of Revised Pro Forma Delegation Agreement, Revised Delegation Agreements with the Eight Regional Entities, and Amendments to the NERC Rules of Procedure," Docket No. RR10-11-000 (June 9, 2010).

⁴ *Id.* at pp. 43-44.