

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

<i>North American Electric Reliability Corporation</i>	)	<b>Docket Nos. RR08-4-000, RR08-4-001, RR08-4-002</b>
	)	
	)	

**MOTION FOR AN EXTENSION OF TIME  
OF THE  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION**

Pursuant to Rules 212 and 2008 of the Federal Energy Regulatory Commission’s (“FERC”) Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.2008 (2008), the North American Electric Reliability Corporation (“NERC”) hereby submits a Motion for an Extension of Time from September 18, 2009 to March 1, 2010 to allow it to submit a compliance filing in response to FERC’s June 19, 2008 Order<sup>1</sup> and November 20, 2008 Order<sup>2</sup> in the above-captioned proceedings. FERC’s Orders directed NERC to submit a compliance filing containing NERC’s evaluation of assigned Violation Severity Levels (“VSLs”) using four specific guidelines that FERC developed. Absent an extension, the filing will be due on September 18, 2009.

NERC and industry stakeholders have expended considerable efforts on the VSL compliance filing, and a revised set of VSLs have been approved by stakeholder ballot using the *Reliability Standards Development Procedure*. However, post-ballot issues relating to the analysis of the VSLs using FERC’s guidelines and to consistency of results have been identified. NERC believes that additional review and revisions may be necessary prior to approval by the NERC Board of Trustees and submission to FERC and applicable governmental authorities to

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<sup>1</sup> *North American Electric Reliability Corp.*, 123 FERC ¶ 61,284 (2008) (June VSL Order).

<sup>2</sup> *North American Electric Reliability Corp.*, 125 FERC ¶ 61,212 (2008) (November VSL Order).

ensure conformance with FERC's guidelines. While recognizing that the VSLs are not part of a Reliability Standard and therefore may be submitted without balloting, NERC believes the extraordinary commitment of stakeholders to the completion of this project merits affording those stakeholders the opportunity to review and consider the post-ballot changes. Additional time is required for NERC to do so and to submit the compliance filing to the NERC Board of Trustees for approval at its February 2010 meeting.

NERC intends to review the changes resulting from the additional review with stakeholders and to seek their approval through ballot, consistent with the *Reliability Standards Development Procedure*. The extension of time will enable NERC to carry out the following activities:

- 1) Post changes for industry comment;
- 2) Initiate and complete balloting process;
- 3) Prepare and receive NERC Board of Trustees approval; and
- 4) Develop and finalize regulatory filings.

Accordingly, NERC respectfully requests an extension of time to and including March 1, 2010 for the filing of the VSL guideline analysis compliance filing.

WHEREFORE, in consideration of the foregoing, NERC respectfully requests that FERC grant an extension of time to and including March 1, 2010, for the submittal of a compliance filing responding to FERC's June 19, 2008 and November 20, 2008 Orders.

Respectfully submitted,

Rick Sergel  
President and Chief Executive Officer  
David N. Cook  
Vice President and General Counsel  
North American Electric Reliability Corporation  
116-390 Village Boulevard  
Princeton, NJ 08540-5721  
(609) 452-8060  
(609) 452-9550 – facsimile  
david.cook@nerc.net

/s/ Rebecca J. Michael  
Rebecca J. Michael  
Assistant General Counsel  
Holly A. Hawkins  
Attorney  
North American Electric Reliability  
Corporation  
1120 G Street, N.W.  
Suite 990  
Washington, D.C. 20005-3801  
(202) 393-3998  
(202) 393-3955 – facsimile  
rebecca.michael@nerc.net  
holly.hawkins@nerc.net

**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 14th day of September, 2009.

*/s/ Rebecca J. Michael*  
Rebecca J. Michael

*Attorney for North American Electric  
Reliability Corporation*