



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

VIA ELECTRONIC FILING

January 12, 2009

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

**RE: Comments of the North American Electric Reliability Corporation on the Notice of Proposed Rulemaking for Western Electricity Coordinating Council Regional Reliability Standard Regarding Automatic Time Error Correction, Docket No. RM08-12-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (“NERC”)<sup>1</sup> is pleased to provide these comments in response to the referenced Notice of Proposed Rulemaking (“NOPR”).<sup>2</sup> NERC commends the Federal Energy Regulatory Commission (“FERC” or the “Commission”) on its determination to approve the proposed Western Electricity Coordinating Council (“WECC”) Regional Reliability Standard BAL-004-WECC-01 – Automatic Time Error Correction (“ATEC”) in accordance with Section 215(d)(2) of the Federal Power Act (“FPA”)<sup>3</sup> and Section 39.5 of the Commission’s regulations.<sup>4</sup> NERC understands that WECC will be filing separate comments, and NERC has read WECC’s comments.

In the NOPR at P 36, the Commission notes that the phrases “large accumulation” and “in such a situation” are undefined in Requirement R1.2 and proposes that WECC modify the standard to address this concern. WECC acknowledges the concern and states it can either define the terms within the standard or modify the standard with specific parameters that would trigger actions required. NERC

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<sup>1</sup> The Federal Energy Regulatory Commission (“FERC” or “Commission”) certified NERC Corporation as the electric reliability organization (“ERO”) in its order issued July 20, 2006 in Docket No. RR06-1-000. 116 FERC ¶ 61,062 (July 20, 2006).

<sup>2</sup> *Western Electricity Coordinating Council Regional Reliability Standard Regarding Automatic Time Error Correction*, (“NOPR”), 125 FERC ¶ 61,200 (2008).

<sup>3</sup> 16 U.S.C. 824o.

<sup>4</sup> 18 C.F.R. § 39.5 (2006). See NOPR at P 1.

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agrees that further clarity in these terms is appropriate and accepts WECC's proposal as responsive to the issue.

Additionally, in P 37 of the NOPR, the Commission proposes that WECC clarify whether the language of Requirement R2 that allows "to have ATEC out of service for a maximum of 24 hours per calendar quarter" refers to a single occurrence or cumulative limit. NERC understands that WECC intended the phrase to permit an accumulated total of up to 24 hours from one or more occurrences. NERC accepts WECC's explanation and believes it addresses the Commission's concern.

Further in P 44 and P 49 of the NOPR, respectively, the Commission proposes to direct modifications to the Violation Risk Factors and Violation Severity Levels assigned to BAL-004-WECC-01. In its comments, WECC supports the Commission's proposed direction. NERC agrees with the Commission and WECC that the proposed modifications will ensure consistency with the current structure and format of Violation Risk Factors and Violation Severity Levels.

NERC respectfully submits these supporting comments and requests the Commission approve the BAL-004-WECC-01 Regional Reliability Standard as proposed in the NOPR.

Sincerely,

/s/ Rebecca J. Michael

Rebecca J. Michael  
Assistant General Counsel

cc: Official Service List in Docket No. RM08-12-000

Document Content(s)

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