

Entergy Comments on

DRAFT MOU BETWEEN NAESB AND NERC 10/15/02

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10/22/02

We appreciate the effort extended by the participants in this process. At this time we have the following two comments on the draft MOU.

First, the Joint Interface Committee (JIC) composition is contained in item 2.2 with recommendation approval based on a simple majority vote, item 2.3. Please clarify how the 50/50 voting process will be supported when each segment is represented in NAESB with 5 segments and NERC with 9 segments. What voting rule will the JIC use to assure that the NAESB 5 segment votes are equivalent to the NERC 9 segment votes?

2.2 The JIC is the central coordinator of the coordination process. The JIC shall be composed of representatives from NERC holding 50 % of the votes and representatives from NAESB WEQ holding 50 % of the votes. Members of the JIC will be determined by each organization, with every effort to have each segment represented.

2.3 The JIC will approve its recommendations by a simple majority vote.

Our second comment concerns the timing of the standard request. The JIC should review and recommend assignment only after a request has received similar development in either organization. For instance, the assignment of a NERC SAR is reviewed by the JIC after the SAR is developed and the SAC approves the SAR development as a standard. However, the MOU does not provide the NAESB request the same opportunity. Per the MOU section 2.4, the JIC would review the NAESB request after it is assigned to the WEQ. The MOU should be revised to allow the NAESB WEQ to also refine the request as is done with a NERC SAR.