

October 23, 2002

Ms. Rae McQuade
North American Energy Standards Board
1100 Louisiana, Suite 3625
Houston, TX 77002

RE: Draft NERC-NAESB MOU

Dear Ms. McQuade,

Below are my comments regarding the draft NERC-NAESB MOU:

- The draft is an excellent start. I concur with the joint standards development process outlined in section 2 of the draft. Obviously the determination of objective criteria (Appendix A) will be vital as will the makeup of the JIC.
- If the NERC SAC and the NAESB WEQ EC standard development process is working properly, the JIC will only need to focus on standard requests that are not predominantly related to either reliability standards or business standards and communication protocols.
- By submitting the standard request to the JIC after the SAC has authorized a standard to be drafted (for NERC standard requests) or the WEQ EC has assigned a request to a subcommittee (for NAESB standard requests) for standard development, duplication of effort should be minimized.
- It is unclear whether Appendix B is intended to represent each organization's existing notification process or a proposal for such. Assuming it's the latter, I propose the following changes on the NERC side of the chart:
 - Modify item b. to read: " SAC reviews standard request
 - Add to item c. the following: Notify NAESB of SAR posting
 - Between item d. and e. add the following: " e. Standard request forwarded to the JIC for review and organization assignment."

On the NAESB side of the chart:

- Between item a. and b. add the following: "b. Notify NERC of standard request."
- After the proposed b. add the following: "c. Standard request forwarded to the JIC for review and organization assignment."

Thank you for the opportunity to comment.

Sincerely,

Alan Johnson
Sr. Policy Analyst
Mirant Corporation

Cc: Tim Gallagher - NERC