

National Rural Electric Cooperative Association (NRECA)
Comments on
October 15, 2002 Draft Memorandum of Understanding
Between NAESB and NERC
October 23, 2002

Please see the following for NRECA's comments on the draft MOU between NAESB and NERC:

- Page 1, line 9 – delete “electronic”; and insert “protocol” after “communication”
- Page 2, Section 1.1 and Page 3, Section 2.2 – The members of NERC and NAESB that make up the JIC must represent a broad cross-section of the electric utility industry. NAESB must ensure that as many subsegments as possible are represented on the JIC. NERC must also ensure that all segments are represented on the JIC. Specifically, both NERC and NAESB must ensure that the representation of the JIC includes representatives from the cooperative and municipal segments of the industry.
- Page 3, Section 2.3 – In order to show there is more than a marginal consensus on whether NERC or NAESB should develop a particular standard, the JIC recommendation approval level should be increased to 66-2/3% vote.
- Page 3, line 69 – The draft MOU states that the JIC will “recommend” which organization should develop a standard. Assuming a vote is not appealable, is the JIC vote simply a recommendation to NERC and NAESB or what exactly is it? Is compliance required of NERC and NAESB?
- Page 5, Section 2.9a. – Delete part “a.” as it is no longer needed when the required vote for passage is 66-2/3%. If the JIC cannot achieve a vote of 66-2/3% vote on deciding whether NERC or NAESB should develop a particular standard, then further negotiation and discussion among the JIC members must take place. These discussions/negotiations must continue until a vote achieving a level of at least 66-2/3% is reached directing either NERC or NAESB to develop a particular standard.
- Page 5, Section 2.9b. – Change “between 51% and 66-2/3%” to “between 66-2/3% and 75%.” Because the terms of “sponsor” and “co-sponsor” are not defined in the MOU, please define.
- Page 5, Section 2.9c. – Change “66-2/3%” to “75%.”

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