

Comments provided by Allegheny Energy Supply

The NERC-NAESB MOU team made a good effort in drafting the proposed MOU. Following are some comments and suggestions:

- Allegheny Energy Supply is in support of one entity that would address all standards. The one entity concept would eliminate the coordination problems and Companies will not need additional resources to cover all the meetings. However, if the industry feels there **must** be two entities one representing the reliability issues and one for commercial issues, then a committee such as the proposed Joint Interface Committee (JIC) will be critical for the coordination process.
- The MOU addresses how the JIC will assign standards based on a set of objective criteria to determine if the standard is on “predominantly reliability” or “predominantly business standards and communication protocols”. The objective criteria should be established and attached to this MOU.
- Details are needed in the MOU for standards that require direct input from both NERC and NAESB.
- A fourth step is needed as stated in Calpine’s comments. The entity that was not assigned the standard should be allowed to review and comment. Such comments should be incorporated into the standard or provided to FERC.
- The MOU also dictated the composition of the JIC. It is unclear at this time whom from the WEQ (board, EC or other voted members) and NERC (MIC, ESC or other voted members) will populate the JIC.