

# National Grid comments on draft NAESB/NERC MOU

National Grid respectfully submits these comments to the 10/15/2002 draft of the MOU. In addition, we support the MOU with the following changes. The bold text, in brackets below, explains our rationale for the proposed changes.

## Preamble

Whereas ~~most-many~~ standards have both commercial and reliability implications and can range from being predominately reliability in nature to predominately commercial in nature;

## 1. Purpose and Principles of Agreement

1.2 The Parties recognize that ~~most-many~~ standards have both reliability and business standards and communication protocols implications. Accordingly, the JIC will evaluate each proposed new standard with this recognition in mind to determine whether NAESB, ~~or~~ NERC, or both Parties should be assigned development of the proposed new standard. While the JIC will evaluate the disposition of standards with the recognition that ~~most-many~~ standards have both reliability and business standards and communication protocols implications, the intent of NERC and NAESB (through the JIC) is that the coordination process should work toward the development of “standards for the industry” and avoid characterizing standards, wherever possible. [ **PARKING LOT ISSUE:** The JIC should recognize ~~that there may be instances where a standard is best developed with the direct input of both organizations and~~ **{stricken thought has been include in the above edits, sp. the phrase "or both Parties"}** that there may be instances in which the FEREC, or some other regulatory body, might specifically direct NERC or NAESB to develop a standard.]

## 2. Joint Standards Development Process

2.5 The JIC shall evaluate all new proposed standards based on a set of objective criteria that will provide guidance to the members of the JIC in determining whether the proposal should be submitted to either NAESB or NERC for further development. The objective criteria will allow the JIC to ~~characterize-categorize~~ **{see 1.2 re: avoid characterizing}** the standard on a continuum ranging from “predominantly reliability” to “predominantly business standards and communication protocols”. The JIC may prioritize submitted proposals if there are urgent reliability implications. The Parties will jointly develop the objective review criteria prior to the start date for the coordination process.

2.9 The decisions of the JIC are appealable per the following provisions:

- a. In the event of a tie vote of the JIC regarding the designation of the proposed standard, the matter will be referred to the Chairmen of the Parties (or their designee(s)) for ~~resolution for an up or down vote of the proposal~~.
- b. There are appellate rights if the JIC vote ranges between 51% and 66-2/3%. The appeal must be brought within a ten-day period. Only a sponsor, co-sponsor, **{Define sponsor and co-sponsor}** or JIC member can file an appeal. The appeal will be referred to the Chairmen of the Parties (or their designee(s)) for ~~resolution an up or down vote on the proposed standard~~.
- c. If the vote is greater than 66-2/3%, then such vote is non-appealable.

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d. No provision of this MOU affects the rights of Parties' stakeholders before any regulatory body. {Assumed intent}

### **4. Information Exchange** [~~may have included too much detail~~] {the following edits are an attempt to streamline the language, not change the context}

4.1 NERC will inform NAESB each year of its projected standards development activity for the coming year. ~~NERC will promptly inform NAESB and~~ of any additional planned activity ~~as it arises~~. NAESB will inform NERC of the Wholesale Electric Quadrant (“WEQ”) annual plan each year. ~~NAESB will promptly inform NERC about~~ and of any amendments to the WEQ annual plan ~~as they arise~~.

4.2 With respect to each particular request for a standard or standard development action, ~~NERC~~ each Party will promptly inform ~~NAESB the other~~ of the action, or the request in sufficient detail to convey the subject matter ~~and timeline for resolution of the such action or request or action and relevant time periods and comment deadlines~~. See Appendix B.

~~4.3 With respect to each particular request for a standard or standard development action, NAESB will promptly inform NERC of the action, or the request in sufficient detail to convey the subject matter of the request or action and the relevant time periods and comment deadlines. See Appendix B.~~

### **Appendix B**

**{General note: This appendix should more clearly describe how the JIC and related MOU activity fit in with existing NERC and NAESB purposes.}**