

National Grid comments on 10/31/02 draft NERC-NAESB MOU:

1. We would like to see specific language (e.g. in the MOU or in NAESB by-laws) that describes how each NAESB sector will be adequately represented on the Joint Interface Committee (JIC).
2. We are concerned that the NERC functional model is being used as the predominant controlling document by which the JIC will perform its functions. We consider the language in the MOU draft as too specific in describing a model that is an evolving document under the auspices of NERC, which is not approved by NAESB, and which may not accurately convey the distinctions between reliability and business implications that the JIC will have to assess with each specific standards proposal. We suggest that reference to the NERC functional model be eliminated, or at a minimum, referred to as a reference document that may be used by the JIC along with other appropriate references.

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