

The Bonneville Power Administration (BPA) respectfully submits to the North American Energy Standards Board (NAESB) the following comments regarding the working *Glossary of Terms* recently posted for review and comment.

BPA respects the diligent work efforts put forth in this attempt to develop a *Glossary of Terms* and supports development of marketing terms. Clearly, reaching agreement on a set of common marketing terms will be very beneficial and helpful. However, BPA recommends closer coordination in developing these marketing terms between the North American Electric Reliability Council (NERC) and NAESB and suggests possible formation of a joint NERC/NAESB committee that would be responsible in determining which marketing terms need to be defined and work together in the development of a *Glossary of Marketing Terms*.

BPA does not support NAESB developing reliability-related technical terms in its *Glossary of Terms* and believes those terms need to continue to be defined and developed by NERC. It is extremely important that any technical reliability term used in a NAESB Business Practice have the same definition as used in a NERC Reliability Standard, to the extent a NERC Reliability Standard has defined that term. BPA further recognizes NAESB does use technical terms that may not be used by any NERC standard and supports NAESB developing such terms.

When defining and developing reliability-related technical terms, the electric industry needs to have a well thought out process on how those terms will be defined and developed. The work the NERC Standards Drafting Team is currently performing on Version 0 Standards will define many of these technical terms. These standards will undergo review and comment in developing a consensus within the industry, and through these processes, these technical terms will be developed and defined by technical experts. The NERC standards will funnel directly into the business practices developed by NAESB and having a *Glossary of Reliability-related Technical Terms* developed by NERC and used in NAESB's business practices, rather than NAESB developing its own set of such technical terms, maintains the integrity of the terms. Additionally, future revisions to NERC standards allows new or revised terms to also be developed or refined as necessary and permits a transparency to NAESB.

BPA did not comment on specific terms defined in the working *Glossary of Terms* because we believe a lot of the definitions are wrong and, it is also BPA's belief, that a glossary should begin as a compendium of terms and definitions that have already been defined and accepted by the industry and governing bodies, with careful reference to which organization is using the term and definition included in the glossary. BPA does not believe the working *Glossary of Terms* should be the forum for developing NAESB consensus on terms and definitions. Rather, BPA believes the development of NAESB defined terms should be undertaken only when it is clear that a technical term needs to be defined for the purpose of a NAESB Business Practice and the definition should be developed as a part of that business practice development effort. BPA urges consideration in the development of a joint committee to determine which marketing terms need to be defined and developed as a committee to develop a *Glossary of Marketing Terms*, BPA also believes NERC should continue to be the responsible entity in defining and developing a *Glossary of Reliability-related Technical Terms* that defines those terms

Thank you for the opportunity to provide comments.