



## NORTH AMERICAN ENERGY STANDARDS BOARD

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March 2, 2011  
Filed Electronically

The Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street N.E., Room 1A  
Washington, D.C. 20585

RE: Integration of Variable Energy Resources (Docket No. RM10-11-000)

Dear Ms. Bose:

The North American Energy Standards Board ("NAESB") herewith submits these comments in response to the Notice of Proposed Rulemaking on "Integration of Variable Energy Resources" (Docket No. RM10-11-000), issued by the Federal Energy Regulatory Commission ("FERC" or "Commission") on November 18, 2010.

The report is being filed electronically in Microsoft® Word® 2003 and in Adobe Acrobat® Portable Document Format (.pdf). The report is also available on the NAESB web site ([www.naesb.org](http://www.naesb.org)). Please feel free to call me at (713) 356-0060 or refer to the NAESB website ([www.naesb.org](http://www.naesb.org)) should you have any questions or need additional information regarding NAESB work products.

Respectfully submitted,

*Jonathan Booe*

Mr. Jonathan Booe

Deputy Director, North American Energy Standards Board



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cc:

Chairman Jon Wellinghoff, Federal Energy Regulatory Commission  
Commissioner Philip D. Moeller, Federal Energy Regulatory Commission  
Commissioner John R. Norris, Federal Energy Regulatory Commission  
Commissioner Marc Spitzer, Federal Energy Regulatory Commission  
Commissioner Cheryl LaFleur, Federal Energy Regulatory Commission

Mr. Thomas R. Sheets, General Counsel of the Commission, Federal Energy Regulatory Commission

Mr. Joseph McClelland, Director, Office of Electric Reliability, Federal Energy Regulatory Commission

Ms. Jamie L. Simler, Director, Office of Energy Policy and Innovation, Federal Energy Regulatory Commission

Mr. Mason Emmett, Associate Director, Office of Energy Policy and Innovation, Federal Energy Regulatory Commission

Mr. Michael Goldenberg, Senior Attorney, Office of General Counsel, Federal Energy Regulatory Commission

Mr. William E. Murrell, Deputy Director, Division of Economic and Technical Analysis, Office of Energy Policy and Innovation, Federal Energy Regulatory Commission

Ms. Rae McQuade, President and COO, North American Energy Standards Board

Ms. Valerie Crockett, Chair and CEO, North American Energy Standards Board

Mr. William P. Boswell, General Counsel, North American Energy Standards Board

Mr. Michael D. Desselle, Vice Chairman – WEQ, North American Energy Standards Board

Mr. David Cook, General Counsel, North American Electric Reliability Corporation

Mr. Andrew Rodriguez, North American Electric Reliability Corporation



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**UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION**

**Integration of Variable Energy Resources )**

**Docket No. RM10-11-000**

**COMMENTS OF THE NORTH AMERICAN ENERGY STANDARDS BOARD**

The North American Energy Standards Board (“NAESB”) is pleased to provide these comments in response to the Notice of Proposed Rulemaking on “Integration of Variable Energy Resources” (Docket No. RM10-11-000), issued by the Federal Energy Regulatory Commission (“FERC” or “Commission”) on November 18, 2010.

NAESB currently maintains several sets of both wholesale gas and wholesale electric standards that have been adopted by the Commission<sup>1</sup> for gas-electric market coordination.<sup>2</sup> In the event the Commission determines additional harmonization of industry standards for the natural gas and electric markets may be needed to support the integration of variable energy resources (“VERs”), NAESB is prepared to support the Commission in any way necessary to expedite the Commission’s directives and maintain the successful public-private relationship the

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<sup>1</sup> Standards for Business Practices for Interstate Natural Gas Pipelines; Standards for Business Practices for Public Utilities, Order No. 698, FERC Stats. & Regs. ¶ 31,251 (2007).

<sup>2</sup> ICF Resources developed an analysis of the “NAESB Report on the Efforts of the Gas-Electric Interdependency Committee” at the request of the U.S. Department of Energy on June 22, 2006 and can be found through the following hyperlink: [http://www.naesb.org/member\\_login\\_check.asp?doc=icf\\_geic\\_primer062206.pdf](http://www.naesb.org/member_login_check.asp?doc=icf_geic_primer062206.pdf)



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March 2, 2011

organizations have shared for nearly twenty years. As such, we appreciate the opportunity to submit these comments and to support the Commission's activities.

Respectfully submitted,

*Jonathan Booe*

Jonathan Booe  
Deputy Director, North American Energy Standard Board