

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

Enforcement of Statutes, Orders Rules, and Regulations))))	Docket No.	RM06-16-000
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COMMENTS OF THE ISO/RTO COUNSEL ON COMPLIANCE FILING

I. INTRODUCTION

The ISO/RTO Council (“IRC”)¹ respectfully submits these joint comments in response to the NERC’s June 21, 2010 compliance filing in the captioned proceeding. In its filing, NERC seeks to discontinue quarterly data collection associated with nuclear restoration times, as required in Order No. 693. The IRC supports NERC’s request that the Commission re-consider the value of continuing this data collection exercise. Recent adoption of Reliability Standard NUC-001-2 — Nuclear Plant Interface Coordination Reliability Standard and modified Reliability Standard EOP-005-2 — System Restoration from Blackstart Resources Reliability Standard, have increased attention to the issues surrounding the nuclear plant interface with the transmission system, including restoration of nuclear power facilities, and has prescribed accountability for those issues. Compliance monitoring by registered entities and Regional Entities will more effectively take the

¹ The IRC is comprised of the Alberta Electric System Operator (“AESO”), the California Independent System Operator (“CAISO”), Electric Reliability Council of Texas (“ERCOT”), the Independent Electricity System Operator of Ontario, Inc., (“IESO”), ISO New England, Inc. (“ISONE”), Midwest Independent Transmission System Operator, Inc., (“Midwest ISO”), New York Independent System Operator, Inc. (“NYISO”), PJM Interconnection, L.L.C. (“PJM”), Southwest Power Pool, Inc. (“SPP”), and New Brunswick System Operator (“NBSO”). The IESO, AESO and NBSO are not subject to the Commission’s jurisdiction and these comments do not constitute agreement or acknowledgement that they can be subject to the Commission’s jurisdiction. The IRC’s mission is to work collaboratively to develop effective processes, tools and standard methods for improving the competitive electricity markets across North America. In fulfilling this mission, it is the IRC’s goal to provide a perspective that balances reliability standards with market practices so that each complements the other, thereby resulting in efficient, robust markets that provide competitive and reliable service to customers.

place of the data collection effort as the means for addressing these issues. Finally, the IRC submits that the data submissions to-date support the conclusion that priority is being given to restoration of off-site power to nuclear stations. Under these circumstances, the continued need for the collection of data that is the subject of NERC's compliance filing is not apparent.

II. CONCLUSION

WHEREFORE, for the reasons stated above, the IRC requests that the Commission consider these comments and re-consider the value of continuing this data collection exercise.

Respectfully submitted,

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Date: July 21, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service list for the captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 21st day of July, 2010.

Anna Pascuzzo
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