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March 4, 2011

VIA ELECTRONIC FILING

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

**Re: *North American Electric Reliability Corporation,*
Motion to Intervene and Comments of the ISO/RTO Council on the Petition of the
North American Electric Reliability Corporation for Approval of One Emergency
Preparedness and Operations Reliability Standard EOP-008-1 and Retirement of
one Existing Reliability Standard EOP-008-0;
Docket No. RD11-4-000.**

Dear Secretary Salas:

Transmitted electronically for filing in the referenced docket are the Motion to Intervene and Comments of the ISO/RTO Council on the Petition of the North American Electric Reliability Corporation for Approval of One Emergency Preparedness and Operations Reliability Standard EOP-008-1 and Retirement of one Existing Reliability Standard EOP-008-0.

If there are any questions concerning this filing, please call me at (202) 661-2205.

Respectfully submitted,

/s/ Howard H. Shafferman

Howard H. Shafferman
Counsel for ISO New England Inc.
On behalf of the ISO/RTO Council
Enclosure

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

North American Electric Reliability Corporation

)

Docket No. RD11-4-000

MOTION TO INTERVENE AND COMMENTS OF THE ISO/RTO COUNCIL

I. INTRODUCTION

The ISO/RTO Council (“IRC”) respectfully submits this motion to intervene and comments on the Petition of the North American Electric Reliability Corporation for Approval of One Emergency Preparedness and Operations Reliability Standard EOP-008-1 and Retirement of One Existing Reliability Standard EOP-008-0 submitted in the above-captioned docket on February 11, 2011 (“Petition”).

In the Petition, the North American Electric Reliability Corporation (“NERC”) sought approval by the Federal Energy Regulatory Commission (“Commission” or “FERC”) of revised Reliability Standard EOP-008-1 – Loss of Control Center Functionality (“Standard”) as well as approval to concurrently retire existing Reliability Standard EOP-008-0 – Loss of Control Center Functionality.

The proposed Standard is intended to ensure that a plan is in place for backup functionality and that facilities and personnel are prepared to implement that plan. During the implementation of the backup functionality, the responsible entities focus on maintaining the reliability of the Interconnection. The proposed standard applies to Transmission Operators, Balancing Authorities, and Reliability Coordinators. It is intended to effectuate a significant improvement to the current standard and to address specific FERC Order No. 693 directives.

II. MOTION TO INTERVENE

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”).¹ 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.

IRC members conduct their operations in compliance with the NERC Reliability Standards. IRC members operate the bulk power system, administer the organized wholesale electricity markets, and act as the planning authorities within their respective regions. As such, their interests cannot be adequately represented by any other party.

III. COMMENTS

The IRC supports the adoption of EOP-008-1, and the concurrent retirement of EOP-008-0. As discussed in the Petition, the new version of the Standard is a significant revision and improvement to the current enforceable Standard. Most importantly, the new Standard improves reliability by requiring, among other things: (i) the clear delineation of what must be included in the plan for backup functionality; (ii) management of the risk to the Bulk Power System during

¹ 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 transition from primary to backup functionality; (iii) that Reliability Coordinators have a dedicated facility for its backup functionality; (iv) that the plan for backup functionality is tested; and (v) that all Balancing Authorities and Transmission Operators have backup functionality. EOP-008-1 went through numerous drafts, and improved significantly over the course of its development. At the final round of voting pertaining to the Standard, all ISOs/RTOs (with the exception of AESO, which abstained) voted in the affirmative for the Standard. NERC members were afforded ample opportunity to review and comment on the new version of the Standard, and the IRC appreciates the effort that the standard drafting team (“SDT”) and NERC put into developing the new version.

IV. CONCLUSION

WHEREFORE, for the reasons stated above, the IRC supports the approval of the Petition as filed.

Respectfully submitted,

/s/ Craig Glazer

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Date: March 4, 2011

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 4th day of March, 2011.

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