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
MOTION TO INTERVENE AND COMMENTS OF THE ISO/RTO COUNCIL

I. INTRODUCTION


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


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

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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  
Craig Glazer  
Vice President – Federal Government Policy  
Robert Eckenrod  
Counsel  
PJM Interconnection, LLC  
1200 G Street, N.W. Suite 600  
Washington, D.C. 20005

/s/ Raymond W. Hepper  
Raymond W. Hepper  
Vice President, General Counsel, and Secretary  
Theodore J. Paradise  
Senior Regulatory Counsel  
ISO New England, Inc.  
One Sullivan Road  
Holyoke, Massachusetts 01040

/s/ Stephen G. Kozey  
Stephen G. Kozey  
Vice President, General Counsel, and Secretary  
Midwest Independent Transmission System Operator, Inc.  
P.O. Box 4202  
Carmel, Indiana 46082-4202

/s/ Brian Rivard  
Brian Rivard  
Manager, Regulatory Affairs  
Ontario’s Independent Electricity System Operator  
655 Bay Street, Suite 410  
Toronto, Ontario  
M5G 2K4

/s/ Anthony Ivancovich  
Anthony Ivancovich  
Assistant General Counsel-Regulatory  
California Independent System Operator Corporation  
151 Blue Ravine Road  
Folsom, California 95630

/s/ Carl F. Patka  
Carl F. Patka  
Assistant General Counsel  
10 Krey Blvd  
Rensselaer, New York 12144
/s/ Heather Starnes  
Heather Starnes  
Manager, Regulatory Policy  
Southwest Power Pool  
415 North McKinley  
#140 Plaza West  
Little Rock, Arkansas 72205  

/s/ Matthew Morais  
Matthew Morais  
Assistant General Counsel  
Electric Reliability Council of Texas  
7620 Metro Center Drive  
Austin, Texas 78744  

/s/ Kevin C. Roherty  
Kevin C. Roherty  
Secretary & General Counsel  
New Brunswick System Operator  
77 Canada Street  
Fredericton, New Brunswick  
E3B 5G4  

/s/ Diana D. Pommen  
Diana D. Pommen  
Director Interjurisdictional Affairs and Compliance  
Alberta Electric System Operator  
2500, 330 – 5 Avenue SW  
Calgary, Alberta  
T2P 0L4  

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.

/s/ Pamela S. Higgins
Pamela S. Higgins
Ballard Spahr LLP
601 13th Street, NW, Suite 1000 South
Washington, DC 20005
202-661-2258