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UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation	Docket No. RR15-4-000

MOTION TO INTERVENE AND COMMENTS OF AMERICAN PUBLIC POWER ASSOCIATION, NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION, AND TRANSMISSION ACCESS POLICY STUDY GROUP

On December 11, 2014, the North American Electric Reliability Corporation ("NERC") filed its Petition for Approval of Risk-Based Registration Initiative Rules of Procedure Revisions ("Petition").[1] Pursuant to the Commission's December 12, 2014 Notice[2] and Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214, the American Public Power Association ("APPA"), National Rural Electric Cooperative Association ("NRECA"), and Transmission Access Policy Study Group ("TAPS") (collectively, "Joint Commenters") request intervention and comment in strong support of NERC's important Risk-Based Registration ("RBR") initiative.

I. MOTION TO INTERVENE

APPA is the national service organization representing the interests of not-for-profit, publicly owned electric utilities throughout the United States. More than 2,000 public power systems provide over 15% of all kilowatt-hour sales to ultimate customers and serve over 47 million people, doing business in every state except Hawaii. Public power systems own approximately 10.3% of the total installed generating capacity in the

[1] eLibrary No. 20141211-5214.

[2] eLibrary No. 20141212-3070.

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United States. Approximately 300 APPA members are subject to compliance with NERC standards applicable to users, owners and operators of the Bulk-Power System ("BPS").

NRECA is the national service organization for more than 900 not-for-profit rural electric cooperatives and public power districts providing retail electric service to more than 42 million customers in 47 states. NRECA's members include consumer-owned local distribution systems and 65 generation and transmission cooperatives that supply wholesale power to their distribution cooperative owner-members.

TAPS is an association of transmission-dependent utilities ("TDUs") in more than 35 states, promoting open and non-discriminatory transmission access.[3] TAPS members have long recognized the importance of grid reliability. As TDUs, TAPS members are users of the BPS, highly reliant on the reliability of facilities owned and operated by others for the transmission service required to meet TAPS members' loads. In addition, many TAPS members participate in the development of and are subject to compliance with NERC Reliability Standards.

Members represented by Joint Commenters are directly affected by NERC's filing, which proposes a fundamental change in NERC's Rules of Procedure ("ROP") governing registration of entities for compliance with Reliability Standards. Joint Commenters have clear and substantial interests in this proceeding that cannot be represented by any other party, and their participation would be in the public interest. APPA, NRECA, and TAPS should each be granted intervention.

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[3] Duncan Kincheloe, Missouri Joint Municipal Electric Utility Commission, chairs the TAPS Board. Jane Cirrincione, Northern California Power Agency, is TAPS Vice Chair. John Twitty is TAPS Executive Director.

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II. THE COMMISSION SHOULD PROMPTLY APPROVE NERC'S RBR PROPOSAL WITHOUT CHANGE

APPA, NRECA, and TAPS strongly support NERC's RBR Petition, which is a key step towards achieving NERC's objective of moving to a more risk-informed

[4] To the extent necessary and in order to expedite communications, we request waiver of 18 C.F.R. § 385.203(b)(3) to allow multiple addresses to be placed on the official service list, because this motion to intervene is filed on behalf of multiple trade associations.

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enterprise. In recent years, NERC has adopted a more risk-informed approach to reliability standards[5] and to compliance and enforcement.[6] NERC now seeks to apply a risk-informed approach to registration to better focus resources where they will yield the maximum benefit to Bulk Electric System ("BES") reliability.

In the seven years of experience with enforceable NERC reliability standards, it has become clear that the current registration scheme has resulted in numerous instances of over-registration. Joint Commenters have argued repeatedly that the excessive number of registered entities results in significant and undue burdens both for small registered entities as well as for NERC and the Regional Entities. Many of the more than 1,600 unique entities on the NERC Compliance Registry (for more than 4,300 reliability functions)[7] pose little to no risk to the BES or must comply with far more requirements than are needed to provide for the reliable operation of the BES. This compliance burden, as well as the correlative monitoring and enforcement burden on NERC and its Regional Entities, is disproportionate to the BES reliability benefit of keeping such small entities registered, and has the added effect of diluting NERC's reliability mission with unnecessary and costly distractions. In addition, our members that have sought

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[5] NERC strives for "results-based" standards, *available at* http://www.nerc.com/pa/Stand/Pages/ResultsBasedStandards.aspx; *see also* Electric Reliability Organization Proposal to Retire Requirements in Reliability Standards, Order No. 788, 78 Fed. Reg. 73,424 (Dec. 6, 2013), 145 FERC ¶ 61,147 (2013) (approving NERC's request to retire 34 reliability standard requirements that provide little protection for Bulk-Power System reliability or are redundant with other requirements); *N. Am. Elec. Reliability Corp.*, 149 FERC ¶ 61,141, P 55 (2014).

[6] NERC's Find, Fix, Track, and Report (FFT) initiative (*see*, most recently, *N. Am. Elec. Reliability Corp.*, 148 FERC ¶ 61,214 (2014)) and Reliability Assurance Initiative (RAI) (*see* NERC's November 3, 2014 filing in Docket No. RR15-2, eLibrary No. 20141103-5199) are aimed at making compliance and enforcement more risk-based. RAI does not affect the requirements with which a registered entity must comply (and document compliance), but it allows audits to be scoped on a more individual basis and affects how instances of noncompliance are handled. RBR, on the other hand, could reduce or eliminate certain compliance obligations that are not warranted when assessed on a risk-informed basis.

[7] NERC Petition at 6.

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deregistration have faced problems due to the lack of clear procedures and deadlines. There have been some improvements in practice since the Commission issued its decision in the South Louisiana Electric Cooperative Association registration appeal,[8] but it is appropriate to formalize the processes and deadlines in the ROP.

Joint Commenters have worked closely with NERC and other sectors of the industry to craft RBR to right size the Compliance Registry on a risk-informed basis.[9] RBR proposes to eliminate registrations for functions that are largely commercial in nature (Purchasing-Selling Entity ("PSE"), Interchange Authority ("IA"), and Load-Serving Entity ("LSE")), and to increase the general Distribution Provider ("DP") threshold from 25 MW to 75 MW, while adding criteria to ensure that those DPs with peak loads below 75 MW that have particular BES reliability responsibilities remain registered, at least with respect to performance of those responsibilities. RBR will reduce and streamline the registrations of very small DPs with insignificant potential impact on BES reliability, for which the associated compliance burden (on all involved—the entity, NERC, and the Regional Entities) far outweighs the reliability benefits. As graphically illustrated in Attachment A, increasing the threshold for registration of DPs to 75 MW could remove more than 100 entities from full DP registration[10] (amounting to some 25% of the registered DPs), while removing only 0.7% of the load served by NERC-registered DPs.

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[8] *S. La. Elec. Coop. Ass'n*, 144 FERC ¶ 61,050 (2013).

[9] Representatives of Joint Commenters and their members served on NERC's Risk-Based Registration Advisory Group and its Risk-Based Registration Task Force. *See* NERC Petition at 17.

[10] As noted below and explained in NERC's Petition at 40-44, to the extent these entities own and operate under-frequency load shedding equipment for the protection of the BES, they will be retained on the Compliance Registry as "UFLS-Only DPs."

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The proposed changes are technically justified. After vetting a broad array of proposals, NERC, the Regional Entities, and stakeholders performed studies and analyses to determine the level of risk to BES reliability, if any, that would be posed by the changes to the ROP ultimately proposed by NERC. The results are included in NERC's Petition and the accompanying Technical Report.[11]

NERC's RBR Petition deserves prompt Commission approval. RBR's alignment of entity registration with risk to the BES will better focus ERO efforts, and those of the industry, in a manner that preserves and enhances BES reliability. RBR updates and streamlines NERC's Statement of Compliance Registry Criteria ("Registry Criteria") by consistently applying the newly approved and implemented revised BES definition. RBR also improves NERC procedures in a manner that ensures due process and drives consistency within and among NERC regions.

In addition, the Commission should support NERC's active pursuit of "Phase 2" of RBR to evaluate whether there is a definable set of entities registered as Transmission Owner ("TO")/Transmission Operator ("TOP") or Generator Owner ("GO")/Generator Operator ("GOP") whose limited BES assets warrant compliance with only a defined sub-set of otherwise applicable standards.

While NERC's Petition describes RBR in detail, we highlight key components.

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[11] Risk-Based Registration Technical and Risk Considerations—Revised (December 2014), attached as Exhibit C to NERC's Petition ("Technical Report"). Because of their importance to our members, Joint Commenters discuss the technical justification for the proposed DP registration threshold changes in Part II.C below, and in Attachment B include additional context and details regarding the technical support for elimination of LSE registration.

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A. Synchronizing with the BES Definition

NERC's RBR proposal aligns the Registry Criteria with the new BES definition, including the outcome of the exceptions process and any local distribution assessment by the Commission. While NERC's currently-effective Statement of Compliance Registry Criteria[12] includes the new BES definition in Part I, it does not use that term in the remainder of the document, resulting in inconsistencies and disconnects. For example, the Part II definitions of TO and TOP require ownership/operation of transmission "Facilities," which are part of the BES.[13] In contrast, the Current Registry Criteria definitions of GO and GOP use the undefined term "generating units" (rather than Facilities), and are thus disconnected from the BES definition. The Part III limitations on registrations of GO/GOPs and TO/TOPs (Sections III.c and III.d) are similar but not identical to the BES definition. DP registration is determined with respect to connection to the BPS, not BES.

NERC's proposal would align the Registry Criteria with the BES definition by eliminating the Part III criteria for GO/GOPs and TO/TOPs, and using the term "Facilities" in the Part II GO and GOP descriptions. For DPs, connection with the BES (rather than BPS) would be used in the Part III criteria.[14]

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[12] NERC Rules of Procedure, Appendix 5B, Statement of Compliance Registry Criteria, Revision 5.1 (effective July 1, 2014), *available at* http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/Appendix_5B_RegistrationCriteria_20140701_updated_20140602%20(updated).pdf ("Current Registry Criteria").

[13] "Facility" is defined in the NERC Glossary and Rules of Procedure as "a set of electrical equipment that operates as a single *Bulk Electric System* Element" (emphasis added). NERC Rules of Procedure, Appendix 2, Definitions, 10 (July 1, 2014), *available at* http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/Appendix_2_ROP_Definitions_20140701_updated_20140602_redline20140826%20-%207%20terms.pdf.

[14] NERC's proposal also uses the BES terminology in the new materiality criteria.

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Updating the Registry Criteria to integrate and consistently use the new BES definition simplifies the Registry Criteria, facilitates achieving the right registration outcomes, and avoids unnecessary confusion. For example, if an entity's 21 MVA generating unit is found to be non-BES pursuant to one of the BES definition's Exclusions or the BES exceptions process, that entity would not be subject to registration as a GO or GOP based on that unit. Conversely, an entity that owns and operates a generating unit that does not meet the bright-line criteria in the BES definition but that is necessary for the reliable operation of the grid, and therefore has been found to be part of the BES through the exception process, would be subject to registration as a GO/GOP based on that unit pursuant to the Registry Criteria, without the need for an individual material impact determination (as would be required under the Current Registry Criteria). RBR does not otherwise affect the registration of owners and operators of BES assets.

B. Elimination of primarily commercial functions

NERC proposes to eliminate three registration categories from the Registry Criteria—PSE, IA, and LSE. As demonstrated by NERC's Petition, and particularly the thorough Technical Report, the potential risks associated with the RBR proposals are minimal, and those risks are far too insignificant to justify the significant burdens currently imposed on NERC, the Regional Entities, and registered entities. These functions are primarily commercial, rather than reliability-related, and are governed by tariff and other regulations (such as NAESB rules), or are automated (in the case of the IA). Additionally, any BES reliability issues are covered by other functional entities. While tariff obligations under Section 205 of the Federal Power Act, 16 U.S.C. § 824d, (or NAESB rules) are not a complete substitute for reliability compliance obligations

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under Section 215, 16 U.S.C. § 824*o*, the existence of non-Section 215 requirements is nevertheless relevant to assessment of the risk associated with eliminating a Section 215 obligation, and thus to whether the gains from imposing Section 215 obligations are worth the cost and burden on all involved.[15]

Joint Commenters support NERC's approach of eliminating the functional registration for PSE, IA, and LSE, while leaving to the standards development process the necessary "clean up" of standards that currently include these functions in their applicability sections. As discussed in NERC's Technical Report, those clean up efforts are already underway in many cases (e.g., as part of "P 81" efforts[16]). The benefits to the registered entities and the ERO of clear and prompt termination of unnecessary registrations[17] far outweigh the risks to the BES posed by a limited number of orphaned standards determined to be non-material. In Attachment B, we provide additional context and details to support elimination of LSE registration.

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[15] FERC-jurisdictional entities are directly subject to FERC enforcement authority with regard to tariff and NAESB rules, which are incorporated by reference into Commission regulations. *See, e.g.*, Standards for Business Practices and Communication Protocols for Public Utilities, Order No. 676, 71 Fed. Reg. 26,199 (May 4, 2006), FERC Stats. & Regs. ¶ 31,216 (2006) (subsequent history omitted). Entities that are not generally directly subject to Commission jurisdiction must abide by tariff and NAESB rules when they take service from a jurisdictional transmission provider, or these rules come into play through reciprocity. Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities, Order No. 1000, 76 Fed. Reg. 49,842, 49,958, 49,960 (Aug. 11, 2011), FERC Stats. & Regs. ¶ 31,323, PP 799, 815, *reh'g denied*, Order No. 1000-A, 77 Fed. Reg. 32,184, 32,300 (May 31, 2012), 139 FERC ¶ 61,132, PP 771-773 (2012), *order on reh'g*, Order No. 1000-B, 77 Fed. 64,890 (Oct. 24, 2012), 141 FERC ¶ 61,044 (2012), *review denied sub. nom. S.C. Pub. Serv. Auth. v. FERC*, 762 F.3d 41 (D.C. Cir. 2014) (per curiam), *reh'g en banc denied*, No. 12-1232 (D.C. Cir. Oct. 17, 2014).

[16] *See N. Am. Elec. Reliability Corp.*, 138 FERC ¶ 61,193, P 81, *clarifying order on reh'g*, 139 FERC ¶ 61,168 (2012).

[17] *See* Technical Report at 79-80.

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C. Revision of DP function thresholds

Currently, a DP can be registered if it is a "Distribution Provider system serving >25 MW of peak Load that is directly connected to the Bulk Power System."[18] NERC's RBR proposal would raise that threshold to 75 MW (as well as replacing "Bulk Power System" with "BES"). Other criteria for DP registration would be retained: DPs could be registered regardless of size or connection voltage—as those entities can today—based on their control, ownership, or operation of equipment that is part of a required BES-protective Under-Voltage Load Shedding program, a required Special Protection System, or a required transmission Protection System. To further protect reliability, NERC's RBR proposal adds new provisions for registration of a DP, again regardless of size or connection voltage, if it is responsible for providing services related to Nuclear Plant Interface Requirements pursuant to an executed agreement or has field switching personnel identified as performing unique tasks associated with the TOP's restoration plan that are outside of their normal tasks.

The Current Registry Criteria also call for registration of any DP, regardless of size, that participates in a required BES-protective Under-Frequency Load Shedding (UFLS) program.[19] Even DPs with loads less than 25 MW that participate in a required UFLS program must currently comply with *all* applicable DP (and LSE) reliability standards. NERC's RBR proposal keeps DPs that do not meet any of the remaining DP criteria, but participate in a required UFLS program, on the registry as "UFLS-Only

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[18] Current Registry Criteria § III.b.1. The current 25 MW threshold was established in the original Statement of Compliance Registry Criteria based on judgment rather than a technical analysis of potential BES reliability impacts.

[19] Current Registry Criteria § III.b.2.

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DPs."[20] UFLS-Only DPs would be responsible for complying with PRC-006, any applicable regional reliability standards whose purpose is to develop or establish a UFLS program, and any other reliability standards that identify UFLS-Only Distribution Providers in the applicability section.[21]

The proposed revisions to the DP registration thresholds are reasonable and will not result in any material risk to BES reliability. DPs are users of the BES; the DP function does not own or operate BES facilities. Except in very unusual cases (which will be addressed through the material impact process), it is not necessary, from a risk-based perspective, to impose DP requirements on entities with peak loads below 75 MW or not directly connected to the BES, or that do not own or operate protection systems for BES reliability or otherwise perform special BES reliability tasks captured by the additional inclusion criteria. NERC's Technical Report shows that DPs with peak loads under 75 MW serve a very small proportion of U.S. load,[22] and that including these entities on the Compliance Registry is not needed to accomplish the reliability objectives of standards applicable to DPs. Nor is the burden on NERC, the Regional Entities, and registered entities justified by the small reliability benefit, particularly when viewed in the context of reliability standards' purpose of avoiding BES instability, uncontrolled separation, and cascading outages.[23]

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[20] NERC Rules of Procedure, Appendix 5B, Proposed Registry Criteria § III(b) (Oct. 28, 2014), *available at* http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/Attachment_4_ROP_Revisions_October2014.pdf.

[21] As discussed below, UFLS-Only DPs would not be responsible for compliance with existing standards governing maintenance of UFLS protection systems (e.g., PRC-005), or any other standards applicable to DPs.

[22] *See*, *e.g.*, Technical Report at 18.

[23] FPA § 215(a)(4), 16 U.S.C. § 824*o*(a)(4).

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The Technical Report's data is confirmed and illustrated by Attachment A hereto, which includes a graph of the number of DPs with peak loads in various ranges, and the total load served by each range, as well as a chart containing data on load served by small DPs broken down by Regional Entity. These analyses indicate that the proposed threshold increase could significantly reduce the compliance burden for more than 100 small registered entities (some 25% of the registered DPs), as well as the associated burden on NERC and its Regional Entities to monitor and enforce compliance, but would be insignificant from a reliability perspective—amounting to only 0.7% of the peak load served by NERC-registered DPs in the United States. Even in the region with the highest percentage of load served by small DPs, 98% of load will be unaffected by the threshold increase. These additional analyses remove any rational basis for concern that increasing the generic DP threshold from 25 MW to 75 MW will have a material impact on BES reliability. This conclusion is further supported by studies and analyses performed by various entities, as described in NERC's Technical Report.[24]

NERC's proposal to increase the peak load threshold from 25 MW to 75 MW is also consistent with the BES definition's generation threshold of 75 MVA in (among others) Inclusions I2 and I4 and Exclusion E1.[25] Load (i.e., numerous lights, motors, computers, compressors, etc.) is even more dispersed than the dispersed resources at issue in Inclusion I4, and therefore typically has less impact on the BES than an

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[24] For example, PJM notes that it "is required to carry operating reserves at all times . . . ." and that operating reserves are always required to be at minimum equal to the largest generating unit in the RTO, which is significantly larger than the sum of the peak loads of DPs expected to be deactivated. Technical Report at 70. Similarly, VACAR found that the combined peak loads of the DPs expected to be deactivated are statistically insignificant compared to N-1 events that could cause cascading or additional contingencies if such DPs' load data were not provided. Technical Report at 72.

[25] *See* NERC Petition at 36.

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equivalent amount of generation. For example, sudden loss of a generation resource results in the need for other generation to ramp up to replace the lost resource (temporarily reducing operating reserves); sudden loss of load requires generators to ramp down thereby increasing the total resources available to serve BES loads.

NERC's proposed retention of small DPs that participate in BES-protective UFLS programs on the Compliance Registry as UFLS-Only DPs further mitigates any risk that would result from deactivation of DPs with peak load under 75 MW that do not meet the other specific reliability-protective criteria (e.g., UVLS). This conservative proposal strikes the right balance: it ensures that such DPs continue to participate in existing UFLS programs, without imposing on their ratepayers the additional costs of compliance with all other DP standards. NERC's proposal to limit UFLS-Only DPs' compliance obligations to the sorts of requirements included in PRC-006-1,[26] without requiring compliance with protection system maintenance standards such as PRC-005-1.1b and PRC-008-0, is appropriate and consistent with the "risk-based" philosophy of this initiative.

The studies performed by NERC and various entities bear out this conclusion. NERC's study concluded that conservatively assuming a 25% UFLS failure rate for DPs below 75 MW (due to elimination of maintenance compliance obligations), the impact (less than 0.44% reduction in response) on UFLS programs is insignificant; "because UFLS operates on an area basis, … failure of a few relays does not pose a significant

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[26] E.g., "provide data to its Planning Coordinator(s) according to the format and schedule specified by the Planning Coordinator(s) to support maintenance of each Planning Coordinator's UFLS database" and "provide automatic tripping of Load in accordance with the UFLS program design and schedule for application determined by its Planning Coordinator(s) in each Planning Coordinator area in which it owns assets."

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risk." Technical Report at 20. MISO found that the peak load of its DPs under 75 MW with UFLS is insignificant, and cannot affect either MISO's UFLS program performance or neighboring entities. Technical Report at 78. Similarly, Florida Municipal Power Agency ("FMPA") studied three DP members with UFLS that would become UFLS-Only DPs; FMPA found that failure of all three UFLS-Only DPs to provide any UFLS would not affect the efficacy of FRCC's UFLS program. Technical Report at 76-77.[27]

Thus, the proposed changes to the registration criteria ensure that DPs are registered to the extent that they can have a material impact on BES reliability.

D. Procedural changes

NERC's proposed changes to its ROP, particularly Appendix 5A, do not plow new ground. Instead, they fill in gaps in the already authorized registration-related activities (e.g., deregistration, determination of material impact, case-by-case limitation of a registered entity's compliance obligations[28]) where clear procedures and timelines are now lacking. Members of Joint Commenters have been frustrated by the procedural status quo (e.g., the inability to secure any action from a Regional Entity on long-pending deregistration requests;[29] apparent lack of an orderly process, with clear evidentiary burdens, as to registration issues; perceived disparities in procedures and outcomes between regions).

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[27] The Technical Report's description of the FMPA study results could be mis-read as merely saying that its program performance would not be impaired if *one* of the entities failed to provide 25% of its expected load shedding. The description provided here more clearly explains the findings of FMPA, a member of APPA and TAPS.

[28] *See, e.g., Cedar Creek Wind Energy, LLC*, 139 FERC ¶ 61,214 (2012); *New Harquahala Generating Co., LLC*, 123 FERC ¶ 61,173, *clarifying order*, 123 FERC ¶ 61,311 (2008).

[29] We do note that a number of long-languishing deregistration requests have been granted recently.

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NERC's proposed ROP changes significantly improve its registration-related procedures by clarifying and standardizing processes, including imposing deadlines for various actions. The proposal adds transparency and reduces regulatory uncertainty in registration-related processes by establishing a non-exclusive list of materiality factors, and amending its ROP to clarify procedures and evidentiary burdens. NERC's revisions also provide for such materiality determinations, as well as requests for limitation of standards applicability to a subset list of otherwise applicable standards[30] and disputes regarding a Regional Entity's application of the Registry Criteria thresholds, to be submitted to a NERC-led multi-regional panel.

These enhancements should drive consistency in processes and outcomes across the ERO Enterprise. In its order regarding NERC's Five-Year Performance Assessment, the Commission recently highlighted the importance of improving consistency:[31]

> The Commission recognizes and supports NERC's efforts to increase consistency and promote coordination across the ERO Enterprise. A key element of consistency is the transparency of the ERO Enterprise's processes and its outcomes. Improved consistency and coordination helps to clarify the roles and responsibilities of NERC and the Regional Entities and should lead to more efficient and uniform work practices. Specifically, we believe that a focus on achieving consistent compliance and enforcement outcomes (e.g., monetary penalties, *registration decisions*, and consistent understanding of Reliability Standard requirements) while not equating consistency with a "lowest common denominator" approach would provide the greatest benefit to registered entities.

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[30] For UFLS-Only DPs, where the revised Registry Criteria establish the criteria for subset list treatment, the NERC-led panel is involved only in the event of disputes regarding application of those criteria.

[31] *N. Am. Elec. Reliability Corp.*, 149 FERC ¶ 61,141, P 70 (2014) (emphasis added).

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Joint Commenters support the proposed ROP changes, as well as the accompanying common-sense procedural advances that do not require Commission approval, such as "one-time attestations"[32] and standardizing forms.[33]

E. Phase 2

NERC's Petition includes procedures to govern case-by-case requests to limit an entity's compliance obligations to a subset of otherwise-applicable reliability standards. The only defined class of entities for which NERC is now proposing a pre-established subset list is the UFLS-Only DP.

In Phase 2 of the RBR initiative, NERC is considering whether other such classes should be established for GO/GOPs or TO/TOPs that share particular characteristics that make such treatment appropriate. For example, it may be the case that some configurations of BES transmission, while warranting application of some TO/TOP standards, should not be subject to the full suite of 500+ requirements. *If* technically justified, defining such classes, along with an identified subset of otherwise applicable standards, could bring significant relief to registered entities for compliance with

[32] As described in NERC's Petition at 49, "One-Time Attestations" ease a registered entity's burden of attesting at every compliance contact that a requirement is not applicable (e.g., because the entity does not own the relevant equipment) by allowing the entity to make a one-time attestation, subject to revision if the underlying facts change.

[33] *See* NERC Petition at 48-49.

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requirements that they are not well-suited to perform,[34] and whose application to such entities brings little if any BES reliability value, but which are burdensome on the registered entity. In addition, it would release NERC and its Regional Entities from monitoring and enforcing such compliance. Establishing one or more additional defined subset lists, with associated qualification criteria, would also reduce the administrative burden that might otherwise be posed by case-by-case requests for subset list treatment.

Because the technical issues involved in these questions are more complex than those at issue with respect to UFLS-Only DPs, NERC and the industry are continuing to study them. While not prejudging the outcome of the ongoing analyses, Joint Commenters believe that the inquiry has merit and should be pursued expeditiously, with Commission support. Joint Commenters look forward to continuing to work with NERC and Commission Staff in Phase 2 of the RBR initiative.

[34] For example, an entity that owns only a single BES 115 kV line or substation cannot specify realistic voltage schedules for generators in accordance with VAR-001 R4 when the entity is located between two neighbors with disparate voltage schedules on their systems; the voltage schedule will be driven by larger neighboring system(s) with a wide-area view and responsibility for BES operations, not the small entity operating limited transmission facilities.

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CONCLUSION

For the reasons set forth above, the Commission should grant Joint Commenters intervention in this proceeding and promptly approve NERC's Petition as proposed. The Commission should also support NERC's active pursuit of Phase 2 of RBR.

Respectfully submitted,

/s/ *Cynthia S. Bogorad*

Cynthia S. Bogorad
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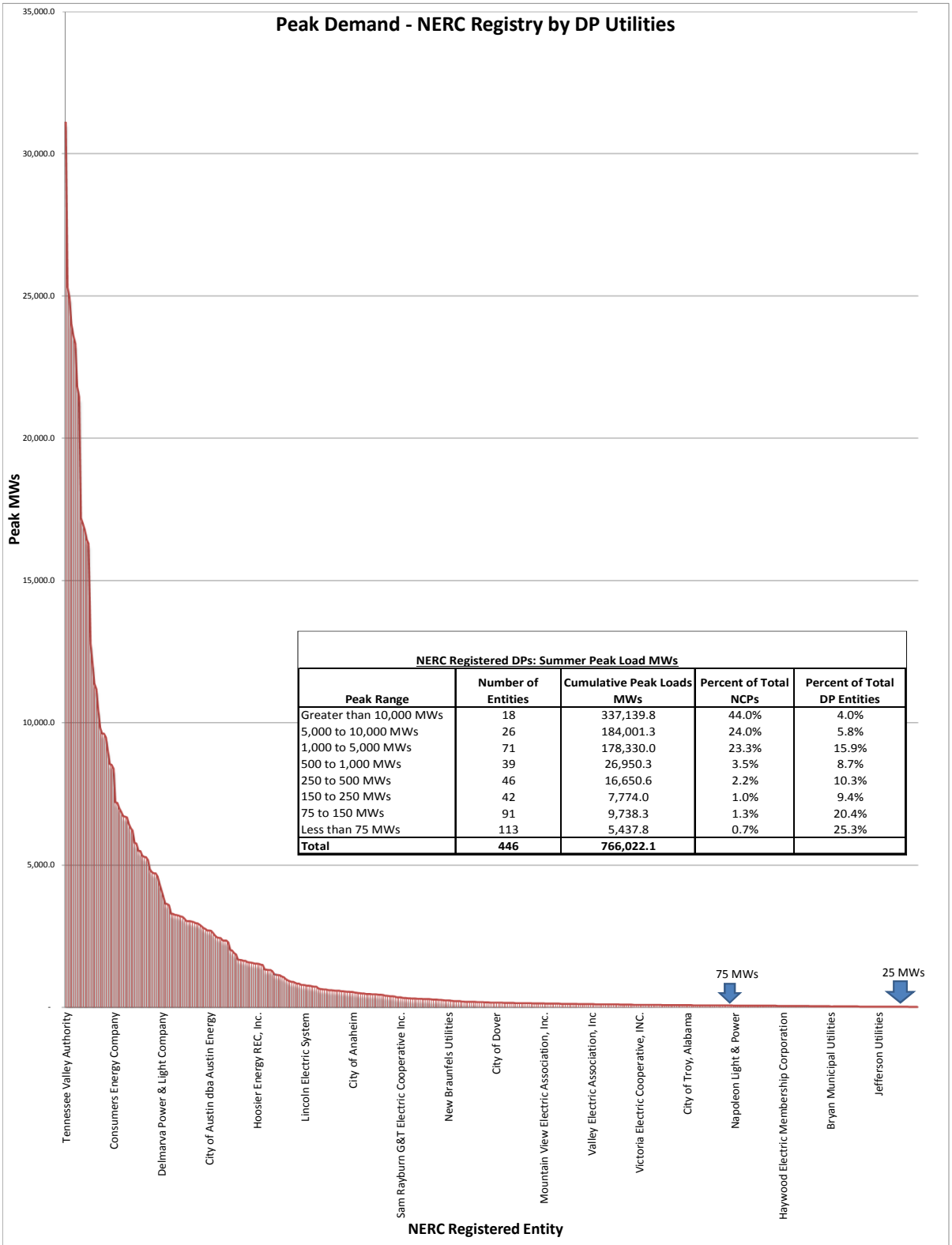
ATTACHMENT A



NERC Registered DPs: Summer Peak Load MWs

Peak Range	Number of Entities	Cumulative Peak Loads MWs	Percent of Total NCPs	Percent of Total DP Entities
Greater than 10,000 MWs	18	337,139.8	44.0%	4.0%
5,000 to 10,000 MWs	26	184,001.3	24.0%	5.8%
1,000 to 5,000 MWs	71	178,330.0	23.3%	15.9%
500 to 1,000 MWs	39	26,950.3	3.5%	8.7%
250 to 500 MWs	46	16,650.6	2.2%	10.3%
150 to 250 MWs	42	7,774.0	1.0%	9.4%
75 to 150 MWs	91	9,738.3	1.3%	20.4%
Less than 75 MWs	113	5,437.8	0.7%	25.3%
Total	**446**	**766,022.1**		

Peak load data are from the Energy Information Administration, Form EIA-861, 2012 summer peak data, for Distribution Provider entities included on the NERC Compliance Registry as of December 31, 2014.

NOTE: There are a total of 446 Distribution Provider entities included in this chart, compared to a total of 475 DP registrations listed on the NERC Registry as of 12/31/2014. The discrepancy between these two totals is accounted for as follows: 5 Canadian entities, 8 entities that are registered in multiple NERC regions but whose total load as reported to EIA was assigned to a single region, and 16 entities that are not required to report peak loads to EIA (e.g., certain federal entities, DPs with loads served by power marketers, and DPs that do not meet applicable reporting thresholds or other requirements.)

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NERC Registered DPs: Summer Peak Load MWs by NERC Region

NERC Region	Number of DPs	Cumulative DP MW	DPs under 75 MW	Small DP cumulative MW	Small DP % of entities in Region	Small DP % share of total Region MW
FRCC	26	45,857.4	3	104.7	11.5%	0.2%
MRO	51	44,500.9	16	710.5	31.4%	1.6%
NPCC	53	53,172.0	23	1,078.5	43.4%	2.0%
RFC	62	201,257.3	15	846.5	24.2%	0.4%
SERC	63	194,617.1	11	547.2	17.5%	0.3%
SPP	44	48,421.3	10	490.4	22.7%	1.0%
TRE	45	48,192.0	13	594.3	28.9%	1.2%
WECC (all)	102	130,004.1	22	1,065.7	21.6%	0.8%
Total	**446**	**766,022.1**	**113**	**5,437.8**	**25.3%**	**0.7%**
WECC (CA)	23	58,114.3	5	178.8	21.7%	0.3%
WECC (non CA)	79	71,889.8	17	886.9	21.5%	1.2%

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ATTACHMENT B

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Attachment B

SUPPLEMENTAL TECHNICAL ANALYSIS OF ELIMINATION OF LSE FUNCTION

NERC's Technical Report (at 10-13, 22-51) demonstrates, with respect to each standard and requirement applicable to LSEs, that no material risk to BES reliability results from the proposed elimination of LSE as a function requiring registration and deactivation of LSEs. Below Joint Commenters highlight and provide additional context with respect to certain reliability standards affected by NERC's proposed elimination of the LSE function.[1]

1. EOP-002-3.1

To meet its purpose of ensuring Reliability Coordinators and Balancing Authorities are prepared for capacity and energy emergencies, EOP-002-3.1 requires BAs and RCs to take various steps to alleviate capacity and energy emergencies.

As noted in the Technical Report (at 24), EOP-011-1, which replaces EOP-002-3.1 (among others), would remove the LSE function from the applicability section. EOP-011-1 has been approved by the NERC ballot body and the NERC Board of Trustees;[2] it was filed with the Commission for approval on December 29, 2014.[3] Sub-requirement R9.1, the only EOP-002-3.1 requirement currently applicable to LSEs, states that when a TSP expects to

[1] While the most recent versions of several of the standards discussed below (unlike the other LSE standards addressed in the Technical Report) are not yet final because they are currently going through the Standards Development Process or pending Commission approval, in each instance the proposed elimination of LSE applicability is justified based on risk.

[2] Project 2009-03 Emergency Operations, *available at* http://www.nerc.com/pa/Stand/Pages/Project-2009-03-Emergency-Operations.aspx (last visited Jan. 2, 2015).

[3] Petition of the NERC for Approval of Proposed Reliability Standard EOP-011-1 Emergency Operations, Docket No. RM15-7-000, eLibrary No. 20141229-5107.

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elevate the transmission service priority of an Interchange Transaction from Priority 6 to Priority 7, "[t]he deficient Load-Serving Entity shall request its Reliability Coordinator to initiate an Energy Emergency Alert in accordance with Attachment 1-EOP-002 'Energy Emergency Alerts.'" As stated in the EOP-011-1 standard development project mapping document (at 35),[4] Requirement R9 of EOP-002-3.1 is proposed to be "[r]etired per P81 – this is addressed in NAESB tagging specification."[5] The drafting team adds (emphasis in original):

> **LSEs have no Real-time reliability functionality with respect to [Energy Emergency Alerts].** Requirement R9 was in place to allow for a Transmission Service Provider to change the priority of a service request, informing the Reliability Coordinator so that the service would not be curtailed by a TLR [Transmission Loading Relief]; and since the Tagging Specs did not allow profiles to be changed, this was the only method to accomplish it. Under NAESB WEQ Etag Spec v1811 R3.6.1.3, this has been modified and now the [Transmission Service Provider] has the ability to change the Transmission priority which, in turn, is reflected in the [Interchange Distribution Calculator]. This technology change allows for the deletion of Requirement R9 in its entirety. Requirement R9 meets … Criterion A of Paragraph 81 and should be retired."

[4] Project 2009-03 Emergency Operations, Mapping Document, *available at* http://www.nerc.com/pa/Stand/Project%20200903%20Emergency%20Operations%20DL/Clean%20Draft%20_Mapping%20Document_October_2014.pdf.

[5] The Independent Experts Review Panel Report ("IERP Report"), which the Commission recently cited with approval (*N. Am. Reliability Corp.*, 149 FERC ¶ 61,141, P 60 (2014)) recommends that Requirement R9 be retired based on P 81 considerations, because it addresses "a market (tariff) issue." IERP Report, 27, *available at* http://www.nerc.com/pa/Stand/Standard%20Development%20Plan/Standards_Independent_Experts_Review_Project_Report-SOTC_and_Board.pdf.

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As the Standard Drafting Team's explanation makes clear, there is no reliability benefit to retaining Requirement R9 from EOP-002-3.1, and thus to retaining LSE applicability of this standard.

2. INT-011-1

INT-011-1 requires LSEs using Point-to-Point Transmission Service for intra-BA transfers to "submit a Request for Interchange unless the information about intra-Balancing Authority transfers is included in congestion management procedure(s) via an alternate method."

The Technical Report notes (at 51) that INT-011-1 "will effectively be retired upon approval of the RBR initiative," and notes that "BAs ultimately balance the load." Thus, the Technical Report concludes that the BA is positioned to address reliability issues covered by INT-011-1.

In Order No. 693,[6] issued in 2007, the Commission expressed a concern that if intra-BA transfers are not included in one of the INT reliability standards, they might not be appropriately curtailed in accordance with their priorities under the Order No. 888 OATT; and accordingly directed that NERC include such a requirement. Order No. 693, PP 816-17. Today, the Commission's concern with compliance with tariff curtailment priorities can be addressed through market or NAESB rules. ERCOT—which is a single BA—has visibility of all transactions through its market. There are no physical intra-BA point-to-point transfers within

[6] Mandatory Reliability Standards for the Bulk-Power System, Order No. 693, 72 Fed. Reg. 16,416 (Apr. 4, 2007), FERC Stats. & Regs. ¶ 31,242 (2007), *effective date stayed*, 72 Fed. Reg. 31,452 (June 7, 2007), *aff'd*, Order No. 693-A, 72 Fed. Reg. 40,717 (July 25, 2007), 120 FERC ¶ 61,053 (2007).

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the ERCOT region to which INT-011-1 could be applied.[7] Even if the Order No. 888 OATT, with its curtailment priorities, generally applied in ERCOT, the Commission has found that the INT standard out of which INT-011 grew (INT-001-1) should not apply to financial point-to-point transfers within ERCOT.[8]

A NAESB Wholesale Electric Quadrant Executive Committee task force is working on changes to NAESB standards within the Eastern Interconnection, expanding e-Tagging requirements to include intra-BA transactions.[9] Finally, TSPs in the Eastern Interconnection (as well as the Western Interconnection) already have the ability to require their transmission customers to tag intra-BA transfers where appropriate, under the OATT and transmission service agreements,[10] to the extent not otherwise addressed through RTO market rules.

Thus, a risk-based approach to reliability standards does not support retaining LSE registrations to ensure compliance with INT-011-1. The goal of the requirement—ensuring that intra-BA transactions are curtailed in accordance with their priorities under Order No. 888—is a commercial task, not a reliability-related requirement; accordingly, its retirement would pose no reliability risk. Seven years of experience have shown that the Commission can rely on NAESB

[7] *Id.* P 811.

[8] Order No. 693, PP 811, 818.

[9] *See* Informational Report on the Parallel Flow Visualization Project Status of the North American Energy Standards Board, 1, 4, Docket No. EL14-82-000, July 11, 2014, eLibrary No. 20140714-5046.

[10] *See, e.g., pro forma* Open Access Transmission Tariff, Att. B (Form Of Service Agreement For Non-Firm Point-To-Point Transmission Service) § 4.0 ("The Transmission Customer agrees to supply information the Transmission Provider deems reasonably necessary in accordance with Good Utility Practice in order for it to provide the requested service.").

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to develop standards governing issues that are market-related and therefore not appropriate subjects for NERC reliability standards.

3. MOD standards

a) MOD-004-1

MOD-004-1's purpose is to promote "the consistent and reliable calculation, verification, preservation, and use of Capacity Benefit Margin (CBM) to support analysis and system operations."

The Technical Report states (at 28) that MOD-004-1 Requirement R3, which applies to LSEs, "can be retired based on other functions (DP, BA or TSP) that are responsible for acquiring extra capacity." More specifically, Requirement R4 of MOD-004-1 is identical to Requirement R3, except that it applies to the Resource Planner function rather than the LSE. Requirement R3 is thus duplicative and can be retired without risk to BES reliability. Furthermore, NERC has proposed to retire MOD-004-1 in its entirety, replacing it with MOD-001-2, which accomplishes the same goal with respect to all methods of calculating available transmission system capability, and which is *not* applicable to LSEs; the Commission has issued a Notice proposing to approve MOD-001-2 and the retirement of MOD-004-1.[11]

b) MOD-031-1

MOD-031-1 imposes requirements on a various functional entities with an objective of "provid[ing] authority for applicable entities to collect Demand, energy and related data to support reliability studies and assessments and to

[11] Modeling, Data, and Analysis Reliability Standards, 79 Fed. Reg. 36,269 (proposed June 26, 2014), 147 FERC ¶ 61,208 (proposed June 19, 2014), *corrected*, 79 Fed. Reg. 47,603 (Aug. 14, 2014), 148 FERC ¶ 61,106 (2014).

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enumerate the responsibilities and obligations of requestors and respondents of that data."

Requirements R2 and R4 of MOD-031-1 apply to LSEs. As the Technical Report notes (at 34), the necessary data can be provided by the BA and DP; those entities, as well as the RP and TP, are also subject to the data provision requirements of MOD-031-1 and are able to provide the same data as the LSE. There is thus no reliability risk involved in removing the LSE from MOD-031-1 applicability.

c) MOD-032-1

MOD-032-1 imposes requirements on a range of functional entities to achieve its purpose of "establish[ing] consistent modeling data requirements and reporting procedures for development of planning horizon cases necessary to support analysis of the reliability of the interconnected transmission system."

Requirements R2 and R3 of MOD-032-1 require the LSE to provide data to the TP or PC. The BA, RP, TO, and TSP are all subject to MOD-032-1's data requirements. These entities possess and can provide the same data as the LSE. The LSE can therefore be removed from MOD-032-1 applicability without risk to BES reliability.

4. TOP standards

a) TOP-001-1a

TOP-001-1a is intended to "ensure reliability entities have clear decision-making authority and capabilities to take appropriate actions or direct the actions of others to return the transmission system to normal conditions during an emergency."

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TOP-001-2 has been filed with the Commission, but NERC subsequently filed a motion to defer action pending development of TOP-001-3, which was granted.[12] These comments therefore address TOP-001-3,[13] as version 2 is essentially moot.

Proposed TOP-001-3,[14] which was approved by stakeholders on January 7,[15] removes LSEs from the applicability section "following the recent Board of Trustees (Board) action on removing Load-Serving Entity as a functional entity."[16] Because the LSE function does not own or operate equipment, LSEs cannot shed load or perform other corrective actions subject to reliability standards; LSEs, as such, have no control that they could exercise even if they were directed to take action, and their removal from TOP-001 is therefore appropriate. As the NERC Technical Report states (at 10), "the only load-shedding standards currently applicable to LSEs (PRC-010-0 and PRC-022-1, both governing UVLS) are also applicable to DPs; DPs (or other functional entities subject to the standards) typically carry out such load shedding because

[12] *Transmission Operations Reliability Standard*, 146 FERC ¶ 61,023 (2014).

[13] Project 2014-03 Revisions to TOP and IRO Standards, *available at* http://www.nerc.com/pa/Stand/Pages/Project-2014-03-Revisions-to-TOP-and-IRO-Standards.aspx (last visited Jan. 5, 2015).

[14] Standard TOP-001-3 Transmission Operations, *available at* http://www.nerc.com/pa/Stand/Prjct201403RvsnstoTOPandIROStndrds/2014_03_fourth_posting_top_001_3_20141122_clean_qr.pdf (last visited Jan. 5, 2015); purpose is "[t]o prevent instability, uncontrolled separation, or Cascading outages that adversely impact the reliability of the Interconnection by ensuring prompt action to prevent or mitigate such occurrences."

[15] Standards Announcement, Project 2014-03 Revisions to TOP/IRO Reliability Standards TOP-001-3, *available at* http://www.nerc.com/pa/Stand/Prjct201403RvsnstoTOPandIROStndrds/2014-03_TOP-001-3_AB_NBP_Results_Announce_01082015.pdf.

[16] Consideration of Comments on Project 2014-03 Revisions to TOP and IRO Standards, 1, *available at* http://www.nerc.com/pa/Stand/Prjct201403RvsnstoTOPandIROStndrds/2014_03_third_posting_comment_report_20141122_response_qr.pdf. (The Standard Drafting Team had previously included the LSE in the applicability section based on its inclusion in the Functional Model.)

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the LSE function does not own equipment." A revised version of PRC-010 (which also incorporates the reliability goals of, *inter alia*, PRC-022[17]) was approved by the Board of Trustees in November, 2014[18] and is expected to be filed with the Commission for approval in the near future; it does not include the LSE in the applicability section, because LSEs do not own or operate UVLS programs. Technical Report at 46-47; Project 2008-02 Revised Standards Authorization Request Form, 4;[19] Project 2008-02 Revised Standard PRC-010-1 – Undervoltage Load Shedding, Draft 2.[20]

In short, because LSEs cannot take the corrective actions required by reliability standards, there is no reliability risk involved in removing them from TOP-001-3 applicability.

b) TOP-002

TOP-002 includes Requirements governing operations planning. TOP-002-3 has been filed with the Commission, but NERC subsequently filed a motion to defer action pending development of TOP-002-4, which was granted.[21] These

[17] Due to a typographic error, the Mapping Document in Appendix A to the Technical Report links to the project page for PRC-*002*-2. The correct project page is available at http://www.nerc.com/pa/Stand/Pages/Project-2008-02-Undervoltage-Load-Shedding.aspx; the Mapping Document is *available at* http://www.nerc.com/pa/Stand/Project%20200802%20Undervoltage%20Load%20Shedding%20DL/PRC-010-1_Mapping_Document_062414.pdf. PRC-022-1 is proposed to be folded into PRC-010-1.

[18] Project 2008-02 UVLS & UFLS, *available at* http://www.nerc.com/pa/Stand/Pages/Project-2008-02-Undervoltage-Load-Shedding.aspx (last visited Jan. 5, 2015).

[19] *Available at* http://www.nerc.com/pa/Stand/Project%20200802%20Undervoltage%20Load%20Shedding%20DL/UVLS%20SAR%20Revised_090513.pdf.

[20] *Available at* http://www.nerc.com/pa/Stand/Project%20200802%20Undervoltage%20Load%20Shedding%20DL/PRC-010-1_09_09_14_clean.pdf .

[21] *Transmission Operations Reliability Standard*, 146 FERC ¶ 61,023.

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comments therefore address the currently effective version 2.1b and the soon-to-be-proposed version 4. Requirements R3 and R18 of TOP-002-2.1b apply to the LSE function. As stated in the Technical Report (at 50), proposed TOP-002-4 removes the LSE function from applicability. TOP-002-4[22] has been approved by stakeholders[23] and the NERC Board of Trustees, and is expected to be filed with the Commission in the near future. The proposed revised standard applies only to the BA and TOP functions.

(1) Requirement R3

Requirement R3 of TOP-002-2.1b requires that:

> Each Load Serving Entity and Generator Operator shall coordinate (where confidentiality agreements allow) its current-day, next-day, and seasonal operations with its Host Balancing Authority and Transmission Service Provider. Each Balancing Authority and Transmission Service Provider shall coordinate its current-day, next-day, and seasonal operations with its Transmission Operator.

According to the Standard Drafting Team's mapping document for the development of proposed TOP-002-4 discussing how the reliability goals of Requirement R3 of TOP-002-2.1b will be met in proposed version 4 and other standards,[24]

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[22] Standards TOP-002-4 Operations Planning, *available at* http://www.nerc.com/pa/Stand/Prjct201403RvsnstoTOPandIROStndrds/2014_03_third_posting_top_002_4_20141001_clean.pdf.

[23] Project 2014-03 TOP-002-4 Ballot Results, *available at* http://www.nerc.com/pa/Stand/Prjct201403RvsnstoTOPandIROStndrds/Project_2014-03_TOP-002-4_Final_Ballot_Results_10292014.PDF.

[24] Project 2014-03 Revisions to TOP and IRO Reliability Standards, Mapping Document, 35, updated Aug. 2014, *available at* http://www.nerc.com/pa/Stand/Prjct201403RvsnstoTOPandIROStndrds/2014_03_third_posting_mapping_document_20141010_clean.pdf.

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> The Transmission Operator and Balancing Authority will receive the necessary data in proposed TOP-003-3, Requirement R5. The Transmission Service Provider provisions are covered in approved MOD-001-1a, Requirement R1; approved MOD-030-2, Requirement R3; and approved MOD-001-1a, Requirement R2. The coordination of plans is in proposed IRO-017-1, Requirement R2.

None of the four standards referred to in the TOP-002-4 mapping document as destinations for portions of current Requirement R3 warrant continued LSE registration. Specifically, neither approved MOD-001-1a nor approved MOD-030-2 applies to LSEs. Proposed IRO-017-1 deals with coordination of planned outages among the BA, PC, RC, TOP, and TP, and thus is also not applicable to LSEs. Finally, although LSEs are included in the applicability of proposed TOP-003-3, they can be removed without risk to reliability, as discussed in Section I.A.4.c) below. Therefore, the proposed removal of LSEs from TOP-002-4 applicability does not pose a BES reliability risk.

(2) Requirement R18

Requirement R18 of TOP-002-2.1b provides:

> Neighboring Balancing Authorities, Transmission Operators, Generator Operators, Transmission Service Providers and Load Serving Entities shall use uniform line identifiers when referring to transmission facilities of an interconnected network.

As the mapping document for proposed TOP-002-4 explains,[25] Requirement R18

[25] Project 2014-03 Revisions to TOP and IRO Reliability Standards, Mapping Document, 44, updated Aug. 2014, *available at*

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> is proposed for retirement as it adds no reliability benefit. Entities have existing processes that handle this issue. There has never been a documented case of the lack of uniform line identifiers contributing to a system reliability issue. This is an administrative item as seen in the measure which simply requires a list of line identifiers. The true reliability issue is not the name of a line but what is happening to it, pointing out the difficulty in assigning compliance responsibility for such a requirement, as well as the near impossibility of coming up with truly unique identifiers on a nation-wide basis. The bottom line is that this situation is handled by the operators as part of their normal responsibilities and no one is aware of a switching error caused by confusion over line identifiers.

Because the requirement has been found to have no reliability benefit, there is no reliability risk associated with no longer requiring LSEs to comply with it.

c) TOP-003

TOP-003-1 requires coordination of scheduled outages. The purpose of proposed TOP-003-3 is "[t]o ensure that the Transmission Operator and Balancing Authority have data needed to fulfill their operational and planning responsibilities."

The currently-effective version of TOP-003, version 1, does not apply to the LSE function; the proposed deactivation of LSEs will therefore not affect the current applicability of TOP-003.

TOP-003-2 (which proposed to include LSEs in the applicability section) was filed with the Commission, but NERC subsequently filed a motion to defer action pending development of TOP-003-3, which was granted;[26] accordingly,

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http://www.nerc.com/pa/Stand/Prjct201403RvsnstoTOPandIROStndrds/2014_03_third_posting_mapping_document_20141010_clean.pdf.

[26] *Transmission Operations Reliability Standard*, 146 FERC ¶ 61,023.

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these comments do not address TOP-003-2, which is essentially moot. TOP-003-3[27] has been approved by the NERC ballot body[28] and Board of Trustees, and is expected to be filed with the Commission in the near future.

Requirement R5 of TOP-003-3 requires that "[e]ach Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, *Load-Serving Entity*, Transmission Owner, and Distribution Provider receiving a data specification in Requirement R3 or R4 … satisfy the obligations of the documented specifications …." (emphasis added). As is the case with respect to MOD-031-1 and MOD-032-1, above, any data required for "the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessment" (Requirement R3) or "the Balancing Authority's analysis functions and Real-time monitoring" (Requirement R4) available from an LSE will also be independently available from the TOP, BA, TO, and/or DP. Removing LSEs from TOP-003-3 applicability therefore poses no reliability risk.

CONCLUSION

For the reasons set forth in NERC's Technical Report and above, the proposed elimination of the LSE function is technically justified and will not materially impact BES reliability.

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[27] Standard TOP-003-2 Operational Reliability Data, *available at* http://www.nerc.com/_layouts/PrintStandard.aspx?standardnumber=TOP-003-3&title=Operational_Reliability Data&jurisdiction=United%20States (requires provision of reliability data for planning purposes).

[28] Project 2014-03 TOP-003-3 Ballot Results, *available at* http://www.nerc.com/pa/Stand/Prjct201403RvsnstoTOPandIROStndrds/Project_2014-03_TOP-003-3_Final_Ballot_Results_10292014.PDF.

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CERTIFICATE OF SERVICE

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CERTIFICATE OF SERVICE

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

Dated on this 12th day of January, 2015.

/s/ *Cynthia S. Bogorad*
Cynthia S. Bogorad

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