

## CAN Comment Form Compliance Application Notice – 0013

Please complete the CAN Comment Form and email it to [cancomments@nerc.net](mailto:cancomments@nerc.net).

### Commenter Information

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Entity Represented: MRO NSRF **represented by:** Madison Gas and Electric Company, Alliant Energy, Western Area Power Administration, Xcel Energy, Rochester Public Utilities, Basin Electric Power Cooperative, Lincoln Electric System, American transmission Company, Wisconsin Public Service, Omaha Public Power District, Minnkota Power Cooperative, Midwest ISO, Otter Tail Power Company, Muscatine Power and Water, Nebraska Public Power District

Region: MRO

### Primary Interest Groups

Are you suggesting a change to the groups mentioned? **No**

If yes, explain what change and why:

### Issue

Are you suggesting a change to the issue statement of the CAN? **No**

### Background

Are you suggesting a change to the background statement of the CAN? **No**

If yes, explain what change and why:

### Compliance Application

Are you suggesting a change to the compliance application section of the CAN? **No**

### Effective Period for CAN

Are you suggesting a change to the effective period of the CAN? **Yes**

If yes, explain what change and why: NERC continues to ignore industry and EEI comments that CANs cannot and should not use retroactive compliance dates. Because any clarification changes, at a

minimum how NERC standards are applied, entities must be allowed time to review and change their practices if needed. It is wrong to used retroactive dates.

**Evidence of Compliance**

Are you suggesting a change to the evidence of compliance mentioned in the CAN? **No**

If yes, explain what change and why: