

CAN Comment Form

Compliance Application Notice – 0015

Please complete the CAN Comment Form and email it to cancomments@nerc.net.

Commenter Information

Name: Joseph DePoorter

Phone Number: 608-252-1581

Email Address: jdepoorter@mge.com

Entity Represented: MRO NSRF consisting of: 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**

If yes, explain what change and why:

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? **Yes**

If yes, explain what change and why:

In situation number 2, it states: *a CEA is to verify evidence that the registered entity took necessary actions to act in the best interest of the interconnection* (emphasis added). The MRO NSRF believes the use of “best interest” is a non bench marked statement as does not give proper guidance in this situation.

Recommend situation 2 be rewritten to read (parallel with situation 1):

In this situation, a CEA is not to verify whether a registered entity has an alternate method or back-up tool. However, a CEA is to verify evidence that the registered entity took necessary actions ~~to act in the best interest~~ to fulfill their obligations in supporting the ~~of the~~ interconnection at all times, and accomplished the requirements of the standard at issue.

Please note foot note 6 that refers to IRO-005-2, R16 was retired on 1 Oct 2011. The NERC Compliance department should ensure that examples given are valid and still enforceable. This lack of attention to detail only heightens the industry's frustration when dealing with CANs.

Effective Period for CAN

Are you suggesting a change to the effective period of the CAN? **No**

If yes, explain what change and why:

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: