

## CAN Comment Form

### CAN Number 0039

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

#### Commenter Information

**Name:** Michael Brytowski

**Phone Number:** 763-445-5961

**Email Address:** mbrytowski@greenergy.com

**Entity (ies) Represented:** MRO NSRF consisting of: Madison Gas and Electric Company, Alliant Energy, Western Area Power Administration, Great River Energy, 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(s):** MRO

#### Primary Interest Groups

Do you disagree with the groups mentioned? **No**

If yes, explain why:

#### Issue

Do you disagree with the issue statement of the CAN? **No**

If yes, explain why:

The MRO NSRF is recommending that this CAN be deleted.

#### Background

Do you disagree with the background statement of the CAN? **No**

If yes, explain why:

#### Compliance Application

Do you disagree with the compliance application section of the CAN? **Yes**

If yes, explain why:

The NSRF thanks NERC for the opportunity to address this CAN and the issue of DOE / NERC disturbance reporting. The NSRF recommends that this CAN be dismissed The requirement for disturbance reporting is very clear:

R3. A Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load Serving Entity experiencing a reportable incident shall provide a preliminary written report to its Regional Reliability Organization and NERC.

R3.1. The affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load Serving Entity shall submit within 24 hours of the disturbance or unusual occurrence either a copy of the report submitted to DOE, or, if no DOE report is required, a copy of the NERC Interconnection Reliability Operating Limit and Preliminary Disturbance Report form. ...

The DOE reporting procedure is not part of the requirement. The DOE is not required to and their process does not imply that a report is sent to NERC. The NSRF believes that this does not rise to the level of a CAN.

NERC may issue a notice stating that the new DOE reporting process does forward to NERC. The NSRF recommends that NERC work with the DOE to include a process to forward the DOE report to NERC and the Regional Entities. This would help reduce duplication and provide consistency in the reports.

The MRO NSRF is recommending that this CAN be deleted.

**Effective Period for CAN**

Do you disagree with the effective period of the CAN?      **No**  
 If yes, explain why:

**Evidence of Compliance**

Do you disagree with the evidence of compliance mentioned in the CAN?      **No**  
 If yes, explain why: