



Comment Form: Project 2009-22: Interpretation COM-002-2



IMPORTANT NOTE: *Please make sure to hit the FINISH button at the bottom of this screen to submit your comments to NERC. A verification code will be provided on the next screen.

Survey Response: Comment Form: Project 2009-22: Interpretation COM-002-2
 Comment Request - Project 2009-22 Interpretation COM-002-2 Communications and
 Coordination R2 for the ISO/RTO Council
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1) **Individual or group.**
 Group

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2) **Group Name**
 MRO NSRF

3) **Lead Contact**
 William Smith

4) **Contact Organization**
 Midwest Reliability Organization

5) **Registered Ballot body segment (check all applicable industry segments)**

- 1 - Transmission Owners
- 2 - RTOs and ISOs
- 3 - Load-serving Entities
- 4 - Transmission-dependent Utilities
- 5 - Electric Generators
- 6 - Electricity Brokers, Aggregators
- 7 - Large Electricity End Users
- 8 - Small End Users
- 10 - Regional Reliability Organizations/Regional Entities

6) **Contact Telephone**
 ###-###-####
 917-526-2371

7) **Contact E-mail**
 ws.smith@midwestreliability.org

8) **Please complete the following information.**

	Additional Member	Additional Organization	Region	Segment Selection
1.	Mahmood Safi	OPPD	MRO	1, 3, 5, 6
2.	Chuck Lawrence	ATC	MRO	1

3.	Tom Webb	WPS	MRO	3, 4, 5, 6
4.	Jodi Jenson	WAPA	MRO	1, 6
5.	Ken Goldsmith	ALTW	MRO	4
6.	Alice Ireland	XCEL/NSP	MRO	1, 3, 5, 6
7.	David Rudolph	BEPC	MRO	1, 3, 5, 6
8.	Erick Ruskamp	LES	MRO	1, 3, 5, 6
9.	Joe DePoorter	MGE	MRO	3, 4, 5, 6
10.	Scott Nickels	RPU	MRO	4
11.	Terry Harbour	MEC	MRO	1, 3, 5, 6
12.	Marie Knox	MISO	MRO	2
13.	Lee Kittelson	OTP	MRO	1, 3, 4, 5
14.	Scott Bos	MPW	MRO	1, 3, 5, 6
15.	Tony Eddleman	NPPD	MRO	1, 3, 5
16.	Mike Brytowski	GRE	MRO	1, 3, 5, 6
17.	Richard Burt	MPC	MRO	1, 3, 5, 6
18.				
19.				
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22.				
23.				
24.				
25.				

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9) **Question 1**

1. The NERC Board of Trustees indicated that the interpretation process should not be used to address requests for a decision on "how" a reliability standard applies to a registered entity's particular facts and circumstances. Do you believe this request for an interpretation is asking for clarity on the meaning of a requirement or clarity on the application of a requirement?

The request is asking for clarity on the meaning of a requirement.

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10) **Question 2**

2. The NERC Board of Trustees indicated that in deciding whether or not to approve a proposed interpretation, it will use a standard of strict construction and not seek to expand the reach of the standard to correct a perceived gap or deficiency in the standard. Do you believe this interpretation expands the reach of the standard?

The interpretation does not expand the reach of the standard.

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11) **Question 3**

3. Do you agree with this interpretation? If not, why not.

Yes

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12) **Question 4 Comments:**

The MRO NSRF wishes to thank the team that devised this clarification

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