

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability
Corporation

Docket No. RR08-6-002 and
RR07-14-003

**TRANSMISSION ACCESS POLICY STUDY
GROUP'S COMMENTS IN SUPPORT**

Pursuant to the Commission's March 17, 2009 Combined Notice of Filings, and Rule 213 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213, the Transmission Access Policy Study Group ("TAPS") expresses its support of the March 16, 2009 response ("Response") of the North American Electric Reliability Corporation ("NERC") to the Commission's February 27, 2009 Data Request in the above-captioned dockets.¹ The NERC Response fully supports NERC's decision to eliminate the Reliability Readiness Evaluation and Improvement Program in light of other programs to develop and enforce reliability standards and to improve reliability.

I. COMMENTS

TAPS filed a motion to intervene in this proceeding and comments in support of NERC's position on January 14, 2009. TAPS submits this filing to express its continued support for NERC's determination to eliminate the Reliability Readiness Evaluation and Improvement Program ("Readiness Program"), as further explained by NERC's March 16, 2009 Response. TAPS recognizes the importance of improving reliability and appreciates the Commission's desire to foster programs that do so. However, TAPS

¹ Letter from Joseph H. McClelland, Dir., FERC Office of Elec. Reliability, to Rebecca Michael, Assistant Gen. Counsel, NERC (Feb. 27, 2009) (*available at* eLibrary Accession No. 20090227-3002).

agrees with NERC's assessment that the Readiness Program has outlived its usefulness and is no longer cost effective, and with NERC's findings that improvement in reliability could better be achieved through directing NERC resources towards improving and enforcing standards coupled with other reliability improvement measures. NERC's decision to eliminate the Readiness Program was fully vetted and supported by NERC stakeholders, including the NERC Operating Committee. NERC's Response explains in more detail how the Readiness Program has been made redundant by, among other programs, the certification program and the Compliance Monitoring and Enforcement Program. NERC's well-justified decision to eliminate the Readiness Program should be upheld; as TAPS explained in its January 14, 2009 comments, resources should not be continue to be expended on programs that have become redundant and that no longer deliver reliability-enhancement value to the consumers that bear their cost.

Respectfully submitted,

/s/ Rebecca J. Baldwin

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April 6, 2009

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 6th day of April, 2009.

/s/ Rebecca J. Baldwin

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