

EEI is the association of the nation's shareholder-owned electric utilities, international affiliates, and industry associates world-wide.

EPSA is the national trade association representing competitive power suppliers, including generators and marketers. These suppliers, who account for 40 percent of the installed generating capacity in the United States, provide reliable and competitively priced electricity from environmentally responsible facilities serving power markets. EPSA seeks to bring the benefits of competition to all power customers.

LPPC represents 24 of the largest state-owned and municipal utilities in the nation, reflecting the views of the larger, asset-owning members of the public power community.

NRECA is the not-for-profit national service organization representing approximately 930 not-for-profit, member-owned rural electric cooperatives. The great majority of these cooperatives are distribution cooperatives that provide retail electric service to over 42 million customer-owners in 47 states. In addition, NRECA members include approximately 66 generation and transmission cooperatives that supply wholesale power to their distribution cooperative owner-members.

TAPS is an informal association of transmission-dependent utilities in more than 30 states, promoting open and non-discriminatory transmission access.

The Trade Associations' respective members are users, owners, and operators of the bulk-power system and are subject to the Reliability Standards established by NERC, acting as the Commission-certified Electric Reliability Organization ("ERO"). The Trade Associations and their respective members have been engaged in and provided comments to NERC supporting the development of NERC's proposed Standards Processes Manual. The Trade Associations' respective members are active participants in NERC's standards

development process. Indeed, the employees and consultants who work for or on behalf of the Trade Associations comprise nearly all of the subject-matter experts that populate NERC standards drafting teams and participate in the development and revision of proposed Reliability Standards. The Trade Associations' employees also constitute the vast majority of the membership of the NERC Registered Ballot Body that votes to approve proposed Reliability Standards. Each of the Trade Associations participates actively in reliability-related industry activities on behalf of their respective members and supports NERC's mission of ensuring a reliable North American bulk-power system. The Trade Associations' individual and collective interests in this docket cannot be represented by any other party. It is therefore appropriate for the Commission to grant the Trade Associations' timely motion to intervene in this proceeding, with all rights appurtenant to that status.

II.

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III.

COMMENTS

As discussed in NERC's June 10 Petition, the new Standard Processes Manual incorporates numerous process improvements sought by the industry (and by the Commission) that will enhance the quality and quicken the pace of Reliability Standards development, while respecting American National Standards Institute requirements for standards accreditation and the statutory framework for standards development established in section 215 of the Federal Power Act ("FPA"). Many of the process improvements accomplished in the Standards Processes Manual are directly responsive to stakeholder comments on the standards process submitted to NERC during the course of NERC's development of the Three-Year Electric Reliability Organization Performance Assessment Report that was submitted to the Commission on July 20, 2009, in Docket No. RR09-7-000.

In summary, the proposed changes will improve standards quality, reduce standards development time, reduce resource burdens on the industry to review and comment on draft standards, and improve the overall quality of NERC Reliability Standards. For these reasons, the Trade Associations support prompt approval of NERC's Petition without condition and request the earliest possible effective date for the proposed manual.

NERC and the industry are committed to continuous improvement of the standards development process. However, at this time it is critically important for proposed changes in NERC's petition to be approved as expeditiously as possible so that these streamlined processes can be implemented by NERC and the industry. For these reasons, the Trade Associations suggest that, should the Commission identify potential additional improvements to the Standards Processes Manual or other related changes to the NERC Rules of Procedure that may be appropriate or necessary under FPA section 215, the Commission should direct NERC to consider such modifications for inclusion in a subsequent version of the Standards Processes Manual.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding

Dated at Washington, D.C., this 12th day of July, 2010.

By _____ /s/

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