



June 18, 2009

VIA FEDERAL EXPRESS

Mr. David Cook
NERC Vice President and General Counsel
North American Electric Reliability Council
Princeton Forrestal Village, 116-390 Village Boulevard
Princeton, New Jersey 08540-5721

Dear Mr. Cook:

The New York State Reliability Council (NYSRC)¹ submits these comments for consideration by NERC in connection with its three year ERO Performance Assessment.

The NYSRC strongly recommends that NERC continue to support the traditional role of regional reliability entities with respect to the development and conformance monitoring of reliability standards and criteria. While the NYSRC fully supports mandatory national reliability standards, and the role of NERC as the ERO in the coordination and monitoring of those standards, the regional reliability entities and their members possess the unique experience and expertise that render them best qualified to serve as the primary resource for the development and monitoring of both national and regional reliability standards and criteria.

It is the view of the NYSRC that an expansion of NERC's role that would in any way diminish the responsibilities of the regional entities would be a serious error. It could undermine our common goal of ensuring a reliable bulk power system to serve the changing needs of our customers.

Therefore, the NYSRC recommends that NERC focus on ways to enhance its performance with respect to the coordination and oversight of national reliability standards, and continue to support the

¹ The NYSRC was formed and approved by the Federal Energy Regulatory Commission in 1999. It is the successor to some of the functions of the New York Power Pool. The NYSRC's primary responsibilities include the development of reliability rules that must be complied with by the New York Independent System Operator ("NYISO") in its operation of New York State's bulk power system, and by the NYISO's market participants. The NYSRC also is responsible for determining the annual installed reserve requirement ("IRM") necessary to meet resource adequacy criteria for the New York Control Area.

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crucial role of regional entities as NERC's primary resource in developing and assessing conformance with national and regional reliability standards and criteria.

Sincerely,



George C. Loehr

Chairman

New York State Reliability Council

Executive Committee

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