

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

Remedial Action Schemes Reliability Standard	) ) )	Docket No. RM16-20-000
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**COMMENTS OF THE  
NEW ENGLAND STATES COMMITTEE ON ELECTRICITY**

Pursuant to the Federal Energy Regulatory Commission’s (“Commission”) Notice of Proposed Rulemaking issued on January 19, 2017 (the “NOPR”),<sup>1</sup> the New England States Committee on Electricity (“NESCOE”)<sup>2</sup> hereby submits these limited comments on the Commission’s proposal to approve Reliability Standard PRC-012-2 – Remedial Action Schemes (“RAS”).

The NOPR seeks comment, *inter alia*, on the Commission’s proposal to clarify, in a final rule, “that Reliability Standard PRC-012-2 will not modify or supersede any system performance obligations under Reliability Standard TPL-001-4.”<sup>3</sup> NESCOE understands that ISO-NE, together with other system operators, is filing comments in this proceeding in response to the Commission’s request for comment on this proposed clarification. These comments, as NESCOE understands, will request that any clarification in the final rule that Reliability Standard PRC-012-2 does not modify or supersede any system performance obligations under

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<sup>1</sup> See *Remedial Action Schemes Reliability Standard*, 158 FERC ¶ 61,042 (2017), 82 Fed. Reg. 9702 (Feb. 8, 2017).

<sup>2</sup> NESCOE is the Regional State Committee for New England. It is governed by a board of managers appointed by the Governors of Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont and is funded through a regional tariff that ISO New England Inc. (“ISO-NE”) administers. NESCOE’s mission is to represent the interests of the citizens of the New England region by advancing policies that will provide electricity at the lowest reasonable cost over the long-term, consistent with maintaining reliable service and environmental quality. These comments represent the collective view of the six New England states.

<sup>3</sup> NOPR at P 16 (footnote omitted).

Reliability Standard TPL-001-4 also confirm that TPL-001-4 allows responsible entities to assume that all RAS are operating properly.

NESCOE recognizes the importance of, and shares the Commission's interest in, implementing reliability standards that address risks to the bulk electric system. However, as NESCOE has stated with respect to the development of mandatory standards, incremental reliability gains must be measured against the magnitude of risk and the cost associated with any such standard. NESCOE is concerned that, absent confirmation that TPL-001-4 allows responsible entities to assume that all RAS operate properly, a clarification in any final rule that Reliability Standard PRC-012-2 does not modify or supersede any system performance obligations under Reliability Standard TPL-001-4 could be misinterpreted by responsible entities to require actions with respect to limited impact RAS that would add material costs to consumers without meaningful reliability benefits. NESCOE respectfully urges the Commission to strongly consider ISO-NE's comments on this issue.

Respectfully submitted,

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