

## New England States Committee on Electricity

September 23, 2011

Mr. John Q. Anderson  
Chairman of the Board of Trustees  
North American Electric Reliability Corporation  
Suite 600 North Tower  
3353 Peachtree Road NE  
Atlanta, Georgia 30326

Re: New York Public Service Commission Communication dated September 12, 2011 on Definition of the Bulk Electric System Project 2010-17

Dear Mr. Anderson:

The New England States Committee on Electricity (“NESCOE”) writes in support of the New York State Department of Public Service (NY DPS) letter to you dated September 12, 2011 concerning the Definition of Bulk Electric System (BES). NESCOE is New England’s Regional State Committee and is governed by a Board appointed by the six New England Governors. This communication represents the collective view of the six New England States

As the NY DPS stated, the definition of the Bulk Electric System is a foundational construct for the North American Electric Corporation (NERC). The definition determines what facilities on the electric grid will be subject to federally imposed standards that will entail significant costs, whether for compliance or violations. The NY DPS expressed to you its deep concern that NERC’s current proposed definition of the BES is not based on sufficient technical analyses or on a cost impact study.

NESCOE agrees that NERC must, as a threshold matter provide a clear technical basis for its proposals. Consistent with our comments submitted to NERC in May 2011, NESCOE also agrees emphatically with the NY DPS that NERC must assess cost implications of proposals, and weigh them against the potential reliability benefits that would be achieved. Ratepayers should pay only for those upgrades that achieve an appropriate level of reliability and which are based on solid technical analysis with justified cost benefits.

Thank you for your consideration of our views.

Sincerely,

New England States Committee on Electricity

/s/

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cc: Garry A. Brown, Chairman, New York State Public Service Commission  
Joseph H. McClelland, Director, Office of Electric Reliability, Federal Energy  
Regulatory Commission