

Subj: **NAESB-NERC MOU**  
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From: Tom Wies  
To:  
[Naesb@aol.com](mailto:Naesb@aol.com)

To the MOU Team:

On behalf of the electric transmission owners in New England, and as chair of the NEPOOL Transmission Owners Committee, I wish to submit this brief commentary on the NAESB/NERC Memorandum of Understanding regarding coordination of the development of business practice, electronic communications and electric reliability standards. The transmission owners are concerned with the possibility that approval of a standard by the JIC might preclude individual companies from subsequently challenging that standard. We would like to suggest, therefore, that a new subsection "d" be added to Section 2.9, reading as follows:

No provision of this MOU shall affect the right of any person or entity that is not a party hereto to propose or oppose any standard approved by the JIC before any regulatory or adjudicatory body having jurisdiction.

Thank you very kindly for your attention.

Tom Wies