

Allegheny Power
Transmission Segment (IOU)

Comments on
October 31, 2002 Draft MOU Between NAESB and NERC
November 4, 2002

Please accept the following comments and suggestions:

- We agree with the need for further clarity in Section 2.8. The right to appeal the assignment of a proposed standard and the appeal process should be documented in detail. The following issues should be specified:
 - The appeal should be limited to the assignment of the proposed standard.
 - Who can appeal? Should appeals be limited to initiator of the proposed standard or extended to JIC representatives, NERC or NAESB as an entity, or any interested party?
 - The appeal period should be limited to 30 days following the determination or resolution reached by the JIC.
 - An appeal of a determination or resolution of the JIC where the vote ranged between 51% and 66-2/3% should be directed to the JIC.
 - Any determination or resolution of the JIC where the vote was greater than 66-2/3% should not be appealed to the JIC. Appeals in this situation should be directed to FERC or the appropriate regulatory body.

- We agree with the four factors listed in the fourth paragraph of Appendix A. The four factors seem to be granted the same weight in the assignment process. We feel that although factor (c), referring to the priority of the proposal and the ability of either organization to take on and complete the standard development, is a factor in the assignment process, this factor should be the last factor to be considered. Assigning a standard development proposal to the party with the greatest interest and subject expertise should be the goal of every assignment.

Sincerely,
Allegheny Power
Transmission Owner