**FORMAL COMMENTS**

**Quadrant:** Wholesale Electric Quadrant

**Recommendation:** **Number:** 2012 - WEQ AP Item 1(d)

**Title:** Revised Bulk Electric System Definition

**Submitted By:** ISO-NE**,** MISO, PJM, ERCOT, SPP, IESO, CAISO, NYISO

**Date:** February 6, 2012

These comments support adopting the Revised Bulk Electric System definition and referencing the NERC definition of Bulk Electric System. This is appropriate, in this instance, because Bulk Electric System is used uniquely in NAESB Business Practices that relate specifically to NERC Standards.

As a general matter, we do not favor including outside resources by reference, as they can lead to unintended consequences. That is not the case here, because there is close coordination between these NAESB Business Practices and the relevant NERC standards. The direct reference to the NERC definition is also to satisfy a regulatory expectation that NAESB and NERC’s use of the term Bulk Electric System are the same and not in conflict.