

# United States Senate

WASHINGTON, DC 20510

August 6, 2010

Chairman Jon Wellinghoff  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

RE: Docket No. RM09-18-000

Dear Chairman Wellinghoff:

We share your commitment to ensuring the reliability of the nation's high voltage transmission grid. As Senators representing a region dependent on long-distance delivery of electricity from remote generation to dispersed population centers, we appreciate the critical importance of grid reliability to our society and economy.

We are concerned, however, to hear from numerous utilities in our region regarding the Commission's Notice of Proposed Rulemaking (NOPR) addressing the definition of the "bulk electric system" (BES). Northwest utilities are concerned that the Commission's proposed bright-line, 100 kV test could impose significant and unnecessary compliance costs and burdens.

The Commission's NOPR explains that Regional Reliability Organizations (RROs) currently use varying definitions of the BES and that the differences may create gaps in how mandatory reliability standards are applied. We understand that the Commission seeks more uniform applicability of reliability standards. However, it is important to Northwest utilities that regional differences continue to be recognized in the BES definition. We ask that the Commission carefully consider comments from Northwest entities such as the Western Electricity Coordinating Council (WECC), which asked the Commission to adopt region-specific BES exemption criteria and allow RROs to apply those criteria region-wide, instead of facilities seeking Commission exemption on a case-by-case basis.

We appreciate your consideration of our concerns and your continued efforts to efficiently and appropriately advance the reliability of our nation's transmission grid.

Sincerely,



Maria Cantwell  
United States Senator



James Risch  
United States Senator

Mike Crapo

Mike Crapo  
United States Senator

Jeffrey A. Merkley

Jeff Merkley  
United States Senator

Patty Murray

Patty Murray  
United States Senator

Ron Wyden

Ron Wyden  
United States Senator