

to the Electric Reliability Organization's ("ERO") mandatory reliability standards and are active in NERC activities.

NRECA recognizes the importance of assuring reliability and shares the Commission's concern that programs that do so are supported adequately. The RREP was such a program. It served a useful purpose in the three years after the August 14, 2003 blackout in the Midwest portion of the United States.

However, NRECA shares NERC's view that the RREP became redundant with the advent of NERC's Compliance Monitoring and Enforcement Program ("CMEP"). The CMEP addresses many of the same issues as the RREP, which no longer serves an independent purpose since NERC started compliance audit, spot checking and self-certification processes in the second half of 2007. The cost of retaining the RREP would provide no appreciable benefit now that the same issues are being addressed by the more thorough and significant CMEP, and leaving the RREP in place would divert resources of the ERO and Regional Entities needed to support the CMEP.

For these reasons, NRECA supports NERC's proposal to eliminate the RREP.

Respectfully submitted,

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