



Énergie NB Power

Transport Transmission

Tel. (506) 458-6655

Fax. (506) 458-4000

June 10, 2011

BY ELECTRONIC FILING

Ms. Anne-Marie Erickson
Secretary of the Board
National Energy Board
444- 7th Avenue S.W.
Calgary, AB
T2P 0X8

Dear Ms. Erickson,

**Re: File OF-Fac-ElecGen-Rel-IPL 04
Mandatory Electric Reliability Standards
New Brunswick Power Transmission Corporation**

New Brunswick Power Transmission Corporation ("NB Power Transmission") is pleased to provide the National Energy Board ("NEB") with comments on the notice of draft provisions for order for International Power Lines ("IPLs") issued on February 23, 2011.

NB Power Transmission is committed to the safe and reliability operation of the Bulk Power System, including the IPLs. New Brunswick regulates the reliability of the bulk power systems under the *Electricity Act* which gives the New Brunswick System Operator ("NBSO") the authority to set and enforce reliability standards under the Market Rules, subject to oversight by the Energy and Utilities Board.

The NBSO Reliability Compliance Program is coordinated with the North American Electric Reliability Corporation ("NERC") and the Northeast Power Coordinating Council ("NPCC") reliability programs according to the mutual understandings set out in Memorandum of Understandings.

Provision 4 of the draft order requires the submission of a compliance plan for approval by the Board. As part of the NBSO Reliability Compliance Program, NB Power Transmission participates in a number of compliance processes such as self-certification, audits and spot checks. There is no requirement to provide a formal compliance plan describing how the company complies with applicable reliability standards. Rather than submitting a compliance plan, the Board should consider the submission of a confirmation, by an officer of the company, which would identify the standards that have been adopted by the standard authority and that are applicable to the entity. If compliance with any applicable standards cannot be confirmed, the officer of the company should submit details as to why compliance cannot be confirmed.

**Ms. Erickson
Secretary
Page 2 of 2**

The submission of a confirmation letter would also address the reliability standards listed in provision 2 of the draft order. NB Power Transmission is responsible for compliance with requirements that apply to Transmission Owner and Transmission Planner. Reliability standards listed under 2(a), 2(c), 2(d), 2(f), 2(g), 2(i) and 2(l) are solely the responsibility of the NBSO.

Once again, NB Power appreciates the opportunity to provide comments. Should you have any questions or require clarification, please do not hesitate to contact me at (506) 458-6655.

Sincerely,

NEW BRUNSWICK POWER TRANSMISSION CORPORATION



Chantal St-Pierre

Director, Regulatory and Environmental Affairs