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**To:** NAESB Wholesale Electric Quadrant Executive Committee

**From:** PJM Interconnection, LLC

**Subject:** Request for Formal Comments on WEQ Recommendations “Proposed No Action Taken”

**Date:** October 14, 2008

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PJM appreciates the NAESB staff and industry representatives that have worked diligently and in good faith to produce the current set of NAESB standards, and that have made the current recommendations posted for comment.

In response to the NAESB WEQ Executive Committee’s request for formal comments on the WEQ recommendation of ‘Proposed No Action Taken”, PJM offers the following comment.

Regarding 2008 WEQ Annual Plan Item 1(f): - “Review Market System Back-Up existing language and review of existing back-up language”, although PJM agrees that the NAESB WEQ Executive Committee should accept the "Proposed No Action Taken" recommendation, we urge the Executive Committee to refer this issue to NERC for consideration.

Based on recent OATI interchange system and related data-link outages (e.g. PJM & SPP OATI data-link outages in August of this year), it has been demonstrated that the outage of critical business related systems could potentially pose a threat to the reliability of the Bulk Electric System.

Even though this potential threat may fall outside the scope of NAESB’s current business standard & practice projects, PJM believes this possible threat could best be addressed by the WEQ Executive Committee referring the matter to NERC for consideration of further action under the NERC Standards Development Process.

PJM appreciates the opportunity to offer these recommendations for the benefit of the Committee's ongoing efforts and the wider industry.

Respectfully Submitted,

Patrick A. Brown