

**To:** Paul Bailey[pbailey@americaspower.org]  
**Cc:** Michelle Bloodworth[mbloodworth@americaspower.org]  
**From:** Paul Bailey  
**Sent:** Tue 4/3/2018 1:11:50 PM  
**Subject:** Responses to FERC Resilience Questions  
[Grid Operator Responses April 2 Final.pdf](#)

When FERC terminated the DOE fuel-security NOPR in early January, the commission initiated a new proceeding about grid resilience. The first step in the new FERC proceeding was to ask the RTOs/ISOs (grid operators) to respond to 25 questions. We thought you might be interested in what these grid operators had to say. This is our takeaway from their comments:

- **ISO-NE** has a fuel-security problem because of the region's dependence on natural gas and the retirement of coal and nuclear generating capacity.
- **PJM** supports further steps by FERC to address grid resilience.
- **MISO, SPP** and **ERCOT** basically said their grids are resilient. (Note: They said this even though there is no universally agreed-on definition of resilience, nor criteria or metrics for determining whether a grid is resilient. This is part of the reason why FERC initiated the new proceeding.)

The attached blog provides a few excerpts from the 295 pages of comments filed by the five grid operators.

**Paul Bailey**  
President & CEO  
American Coalition for Clean Coal Electricity  
T:  | M:   
[pbailey@americaspower.org](mailto:pbailey@americaspower.org)