

Operate Within Limits – Monitor and Assess Short-term Transmission

<i>SAR Commenter Information</i>			
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E-mail	dmcmillan@calpine.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input checked="" type="checkbox"/> The scope of the SAR should be expanded to include:			
Applicable Functions: Interchange Authority should be checked because of the definition of "Interchange Schedule" in NERC Operating Policy 3, since schedule implies the actual implemented energy flow. The term "operating limits" is used in this SAR as in the "Determine Facility Ratings" SAR. Please see our comments concerning OSL/OSLV for that SAR and ensure that terms are consistent and defined appropriately.			
There should be a companion SAR to this that requires LSEs, distribution providers, and generators to respond to requests that will have the effect of operating the system within Operating Limits.			
Applicability should not be limited to the Reliability Authority, Balancing Authority and Transmission Operator, but should include all operational entities (if you are operating, you have to stay within your defined limits).			
Sufficient detail to provide a clear understanding of the specific functions covered by this SAR.			
<input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate:			

SAR Commenter Information

Name Bill Carr

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Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

The scope of the SAR should be expanded to include:

The scope of the SAR should be reduced to eliminate:

Other comments: The purpose/industry need section should start with: The purpose of this standard is to ensure that a consistent, uniformly applied standard is developed for ...

<i>SAR Commenter Information</i>			
Name	John Anderson and John Hughes		
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: The establishment of this SAR is premature. All commercial implications of the SAR should be identified and mitigated prior to the drafting.			

<i>SAR Commenter Information</i>			
Name	Phil Park		
Organization Powerex			
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: The item in the Description which states "Do not allow an over-subscription of transfer capability" addresses a business practice and should be eliminated.			

<i>SAR Commenter Information</i>			
Name	MAAC Region		
Organization	MAAC		
Telephone	610-666-8854	Fax	610-666-2297
E-mail	dicapram@pjm.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments:			
The primary comment here is that there is a need to agree on terms and definitions. A clear distinction must be made between the violation of a limit that has no impact on the operation of the interconnected system, and the violation of a limit that threatens the security of the interconnected system.			

<i>SAR Commenter Information</i>	
Name	Mike Miller
Organization	Southern Company
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E-mail	mbmiller@southernco.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: See comments below</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: Applicable Functions: Interchange Authority should be checked because of the definition of "Interchange Schedule" in NERC Operating Policy 3, since schedule implies the actual implemented energy flow. The "Assess Transmission future needs and develop transmission plans" SAR does not state a requirement to plan the system so that it can be operated within Operating Limits, therefore, we feel that the Planning Authority should be checked as applicable for this SAR.</p> <p>The term "operating limits" is used in this SAR as in the "Determine Facility Ratings" SAR. Please see our comments concerning OSL/OSLV for that SAR and ensure that terms are consistent and defined appropriately.</p> <p>Please note that there should be a companion SAR to this that requires LSEs, distribution providers, and generators to respond to requests that will have the effect of operating the system within Operating Limits.</p>	

SAR Commenter Information

Name Alan Johnson

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Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

April 23, 2002

SRP Comments on NERC 11 SAR sent out on April 2, 2002.

All 11 SAR's (this group of 10 plus the one sent out earlier) don't contain enough information to make the kind of judgments requested on the forms. Therefore the forms are not filled out.

We recommend all the SAR's be advanced to the next step to develop the specific standards and associated measurements for each standard so that we can evaluate and comment on them.

All of these SAR's are needed for reliable planning and operation of the bulk electric transmission system and meet the principle requirements.

Comments on the White paper:

1. The paper fails to state what standards are supposed to be. This seems so basic; one has to assume that those drafting the white paper want to redefine the definition contained in the Organizational Standards Manual. This leads to a lot of confusion and is not the place to do that.
2. The Planning Standards were written in a different time period than the Operating Policies with different objectives. Thus they are different and that should be recognized. For instance the development of a Planning Functional model has absolutely nothing to do with whether control areas exist or not and whether companies have restructured or not. The statement about control areas may be true for the Operating Policies but it is not true for the Planning Standards.

The Planning Standards (Templates) were written to meet the definition of a standard in the Organizational Standards Manual, to meet at least one of the Reliability Principles, to comply with all the Market Interface Principles and to contain the compliance administration elements. This is very different than what is contained in the Operating Policies. The Planning Standards need to go through the new process so that both the Operating elements and Planning elements of the Organizational Standards are consistent, are not duplicative and are needed for reliability.

3. The term "core reliability requirement" is used in the white paper but is never mentioned in the Organizational Standards Manual. Using an undefined term is very misleading and should be avoided.
4. The paper in several places address "what performance must be achieved". As noted above, an Organizational Standard can be broader than that and this write up is misleading.
5. The process has been lengthened because of the multiple posting of the SAR's. NERC has a body of reliability requirements written up into Compliance Templates. With very little effort these could be written up into SAR's that would provide sufficient detail for NERC to evaluate them. It is very hard to comprehend why one does not use this work to expedite the process. Instead SAR's are sent out with insufficient information. The process is long enough. We should be looking for all ways possible to speed it up.

Comments on the SAR write-up:

1. The SAR write-up only contains the purpose and brief description of a standard. Where is the Standard? I thought that is what the SAR is for?
2. The descriptions are in most cases extremely vague. The write-ups contain words like "such as" or "as defined in the standard". These are big enough to cover a MAC truck. Once again there is insufficient information to make a good judgment.



April 29, 2002

Guy V. Zito
Manager, Planning
Northeast Power Coordinating Council
1515 Broadway Floor 43
New York, NY 10036

RE: NEPOOL Compliance Working Group (NCWG) comments pertaining to the 10 Standard Authorization Requests (SARs) posted for open comment

The NCWG has reviewed the 10 SARs posted for open comment and has agreed they are core standards, which serve a purpose in support of reliability.

Standard Title:

Prepare for and Respond to Abnormal or Emergency Conditions
Prepare for and Respond to Blackout or Island Conditions
Coordinate Interchange
Coordinate Operations
Monitor and Analyze Disturbances, Events and Conditions
Operate Within Limits – Monitor and Assess Short-term Transmission
Define (Physical) Connection Requirements
Design, Install, and Coordinate Control Protection Systems
Assess Transmission Future Needs and Develop Transmission Plans
Determine Facility Ratings, Operating Limits, and Transfer Capabilities

We do not agree that the **SAR Type** is a new standard. We suggest that at a minimum the SAR should indicate the existing standard and whether or not it will be withdrawn when the revised standard is adopted. We suggest that NERC stop the open process of reviewing existing policies and standards if these Organizational Standards will replace them. NERC should clearly indicate that one purpose of the Organizational Standards Process is to replace existing standards.

Sincerely,
Daniel L. Stosick

Chairman, NEPOOL Compliance Working Group
C/o ISO New England, Inc.
One Sullivan Road
Holyoke MA 01040-2841

Cc: NEPOOL Compliance Working Group
CP9 Working Group
Paul Shortly
Richard Burke
Richard Kowalski

SAR Commenter Information

Name Robert D. Smith

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Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

<i>SAR Commenter Information</i>	
Name	Mr. Charles Moser (Northborough, MA) and Mr. Ronald Halsey (Syracuse, NY)
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<i>SAR Commenter Information</i>			
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<i>SAR Commenter Information</i>			
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

SAR Commenter Information

Name Paul Rocha

Organization Reliant Energy HL&P

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HL&P is uncertain whether a meaningful standard can be developed in this area. There are likely to be different requirements for different types of transmission systems. For a larger, more complicated system, more extensive short-term assessments are likely to be more justified than for smaller systems.

<i>SAR Commenter Information</i>			
Name	Brant Eldridge		
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<p>ECAR has conducted a survey of its member companies regarding the eleven SARs, which NERC has initiated to-date. We recognize that the comment period for the first SAR issued ("Balance Resources and Demand") has already closed. However, considering that the first SAR was issued earlier than the other ten primarily just to get the process started, and further considering that all 11 SARs are viewed by NERC as a possible complete set of Organization Standards (re: the "White Paper"), ECAR believes that comments on the first SAR should still be considered along with those on the other ten.</p> <p>11 of the 18 ECAR Full Members, along with two Associate Members, submitted responses to the SAR survey. Some of the responses were submitted using the NERC "SAR Comment Form", while others were contained in narrative e-mails, and one was faxed to us. Therefore, a complete set of the ECAR member company responses will be sent to the Standards Process Manager at NERC via Fed Ex to arrive at NERC by May 3rd. The Fed Ex package will include a copy of this e-mail. FYI, NERC may also receive some of the ECAR member company responses directly from the companies. Some of the individual company responses will be identical to what will be in the Fed Ex package and some will contain more detailed comments.</p> <p>The ECAR member company responses contain numerous and wide-ranging comments about the need for each of the 11 proposed Organization Standards, as well as comments regarding the scope and applicability of the SARs. As your review of these responses will show, there is general ECAR consensus – but not unanimity -- that the 11 SARs as a set cover the scope of performance needed to ensure reliability of the interconnected North American bulk power systems. Some ECAR members feel that there are performance areas not covered in the proposed set of Organization Standards, and they have provided what they think is missing. Others believe that some of the proposed Organization Standards are not needed, and they explain why they feel that way. Numerous comments were directed at the scope and applicability of the SARs. Several ECAR companies questioned the inclusion of the "Distribution Provider" function in the applicability section of the SARs, believing that NERC should stick to its traditional focus on the bulk power systems and stay out of the distribution arena.</p> <p>The recent call for nominees to serve on SAR Drafting Teams is the appropriate next step. ECAR believes that all 11 SARs need to be refined to reflect industry comments and then posted again for another round of industry comments. Before proceeding into actual development of Organization Standards based on these 11 SARs, NERC must have clear industry consensus on the need for each of the Organization Standards outlined in the 11 SARs, as well as consensus on the scope and applicability of those SARs.</p> <p>If the wide-ranging comments received from ECAR members are any indication, there is still some serious work to be done to achieve the needed clear industry consensus on how to proceed.</p>			

East Kentucky Power Cooperative

EKPC believes our present standards are adequate and therefore is not in favor of developing a new set of standards. We also believe the new process should be revised to provide for a screening committee to evaluate proposed standards before they are presented to all NERC members for comment. However, given that we are going to develop new standards with this process, EKPC endorses all eleven of the SARs.

LG&E Energy

LG&E agrees there is a need for the eleven proposed organization standards. However, we do see a disconnect with their development and operating procedures/protocols of RTO's. Where will this coordination take place to ensure consistency, eliminate redundancy, and application particularly since there will most likely be more than 1 RTO at the time of issuance?

VECTRON – Southern Indiana Gas & Electric

The NERC Proposed Organization Standards appear to me to cover the scope of performance needed to insure reliability of the interconnected grid. The scope of the SARs as proposed, also, look fine to me.

Dayton Power & Light

We are okay with the 11 proposed Standards.

Consumers Energy

Consumers Energy opposes all 10 of the SARs on their present form. We understand that it is too late to vote on the 11th SAR.

The concern that we have is that there is only limited ability to prevent new requirements from being incorporated with the old, standard reliability requirements. The SAR descriptions sound good because they espouse the old, tried and true reliability concepts that we have known and loved from the past. If there was an effective way to limit the resulting practices to those traditional values, I would be the first to support them. Unfortunately, we are not voting here on codification of the current practices. We, instead, are voting to develop a set of practices that will include the currently unknown and possibly oppressive, unacceptable set of future requirements. This vote has nothing to do with the tried and true practices from the past. Its about accepting an unknown set of requirements on faith and trust ... that none of the practice developers will be out to do us harm.

The standard argument here is that the SARs are only scope setting documents and that we will still have a change to shape and to vote on the actual standards when they go through the final approval stage. If we believe this argument, we are totally ignoring the lessons from the past. There is no guarantee that ECAR will have any personnel involved in the development of the final practices. It is unclear how many people will be involved in the drafting of the practices nor how they will be selected.

The biggest single concern is what the final product will look like and how it will be voted on. I would make a modest wager that it will consist of a handful of standard practices that we all could accept (and in fact would insist upon) along with three practices that are new and totally unacceptable. We will be faced with the proposition that we must vote on the "package" of practices where we must accept the bad ones to get the good ones. I can find no reference to a line item voting procedure.

The solution to this problem is to suggest a provision in all ten SARs that the final package of practices will not include any policies that are not already in the NERC approved set of policies and standards. Consumers Energy could then support all ten SARs.

Duquesne

Operate Within Limits – Monitor & Assess – Inappropriate as a stand alone SAR, but should be incorporated with SAR #8. Coordinated operations are required to ensure limits are not violated.

<i>SAR Commenter Information</i>			
Name	David L. Hart		
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E-mail	dlhart3@aep.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

SAR Commenter Information

Name Lew Gray, Mike Holtsclaw, Steve Clouse

Organization Indianapolis Power & Light

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Fax 317-261-8996

E-mail lew.gray@aes.com

Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

<i>SAR Commenter Information</i>			
Name	David W. Sandefur		
Organization	Hoosier Energy REC, Inc.		
Telephone	812-876-0267	Fax	812-876-3139
E-mail	dsandefur@hepn.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>	
Name	Verne B. Ingersoll, II
Organization	Progress Energy - Carolina Power & Light Company and Florida Power Corp.
Telephone	919-546-7534
Fax	919-546-7558
E-mail	verne.ingersoll@pgnmail.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p>Applicable Functions: Interchange Authority should be checked because of the definition of "Interchange Schedule" in NERC Operating Policy 3, since schedule implies the actual implemented energy flow. The term "operating limits" is used in this SAR as in the "Determine Facility Ratings" SAR. Please see our comments concerning OSL/OSLV for that SAR and ensure that terms are consistent and defined appropriately.</p> <p>There should be a companion SAR to this that requires LSEs, distribution providers, and generators to respond to requests that will have the effect of operating the system within Operating Limits. Applicability should not be limited to the Reliability Authority, Balancing Authority and Transmission Operator, but should include all operational entities (if you are operating, you have to stay within your defined limits).</p> <p>Sufficient detail to provide a clear understanding of the specific functions covered by this SAR.</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p>	

<i>SAR Commenter Information</i>	
Name	Charles Yeung
Organization	Reliant Resources
Telephone	713-207-2935
	Fax
E-mail	cyeung@reliant.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate: procedures on how to curtail transactions and generation schedules to achieve the reliability objectives stated.</p> <p>Other comments: The existing NERC standard Policy 9, includes a procedure known as "TLR" that must be compliant with FERC tariff obligations to curtail transactions. A core reliability standard should only define the limits and conditions required to achieve a reliable and secure transmission system and allow for market-driven procedures to provide tools for the operators to employ to achieve the core reliability requirements. Further, FERC's upcoming Standard Market Design NOPR will entail new congestion management rules for TPs to adhere to. Procedures for transaction curtailment should be developed with the NAESB process and filed at FERC for approval.</p>	

SAR Commenter Information

Name Kirit S. Shah

Organization Ameren Services -Energy Delivery Technical Services

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Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

The scope of the SAR should be expanded to include:

The scope of the SAR should be reduced to eliminate:

Other comments: The scope is too general. Would this standard cover operation beyond first-contingency?

<i>SAR Commenter Information</i>			
Name	Dan Wheeler		
Organization	NorthWestern Energy		
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>			
Name	John K. Loftis, Jr.		
Organization	Dominion Virginia Power		
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Other comments: I do not work in this area, and have no comments on this SAR			

<i>SAR Commenter Information</i>			
Name	Terri Grabiak		
Organization Allegheny Power			
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E-mail	tgrabia@alleghenypower.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>	
Name	George Bartlett
Organization	Entergy Services
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Fax	
E-mail	gbartle@entergy.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: See Other Comments.</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: We agree this SAR should be a "core reliability" Organization Standard but suggest the title be revised to "Operate Within Thermal, Voltage and Stability Limits".</p> <p>The industry should:</p> <p><input type="checkbox"/> Develop the criteria for this core reliability Organization Standard,</p> <p><input type="checkbox"/> Establish measures for measuring conformance to the criteria, and</p> <p><input type="checkbox"/> Monitor for conformance to the criteria.</p> <p>The Organization Standard should include the requirements that appropriate entities:</p> <p><input type="checkbox"/> Establish thermal, voltage and stability limits for all appropriate facilities and operating conditions,</p> <p><input type="checkbox"/> The system be operated to respect those limits,</p> <p><input type="checkbox"/> Measures be developed to assure conformance</p> <p>The Organization Standard should not establish "how" one develops these limits, "how" one operates to meet the limits, "how" one monitors for criteria violations, or "how" one corrects limit violations, or the details of "how" to measure, data warehouse, or "how" to protect against operation outside of the limits.</p>	

<i>SAR Commenter Information</i>			
Name	Michael Desselle		
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E-mail	mddesselle@aep.com		
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: To the extent that this SAR is transitioning an existing standard from the old world to the new world (Functional Model), then the standard should not go beyond the original scope. Consistent with our general comments, once the clarity is achieved on Standard Market Design and RTO formations, then this standard should be revisited and reevaluated.</p> <p>Additionally, the "Purpose/Industry Need" statement should be rewritten to be more specific as follows: "To establish a standard that requires the bulk electric transmission system be monitored and operated within established thermal, voltage and stability limits".</p>			

<i>SAR Commenter Information</i>			
Name	Ed Kirschner		
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: Should concentrate on performance instead of procedures such as performing day ahead analysis. An entity could perform day ahead analysis but if no action is taken as a result of the analysis then what good is it?			
Other comments: Process and procedures for performing analysis should be part of the certification process and not a standard that has measurement requirements.			

<i>SAR Commenter Information</i>			
Name	Jim Griffith		
Organization Bulk Power Operations Southern Company			
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None			

<i>SAR Commenter Information</i>	
Name	Peter Burke (submitting comments provided by numerous ATC contributors)
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E-mail	PBurke@atcllc.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: Redispatch issues. Redispatch is one of the tools the transmission operator will use to make sure the system is operated within the limits. Therefore, the "generation operator" reliability function should also apply since they will need to take direction from the Transmission Operator and/or Reliability Authority.</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: Would it be appropriate to include comments about operating guides in this standard instead of my comments in the proposed standard to "Determine Facility Ratings, Operating Limits, and Transfer Capabilities?" The transmission operator and Reliability Authority should have some discretion in operating within established limits. I.E. if a line is at it's OSL but the OSL limit was based on summer ratings and it is cool outside, the transmission operator shouldn't be forced into some remedial action.</p>	

SAR Commenter Information

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Organization Duke Power

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Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

<i>SAR Commenter Information</i>	
Name	David Little
Organization	Nova Scotia Power Inc.
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Fax	902 428-7550
E-mail	david.little@nspower.ca
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic? Yes</p> <p>Is the Scope of the SAR fine as it is? No</p> <p>Other Comments The scope is too broad as stated in the description section of the SAR. More detail is required. Specifying "real time monitoring" and "next-day analysis" crosses into the "how to do it" arena. The standard should simply state the desired results.</p>	

<i>SAR Commenter Information</i>			
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Organization	Public Service Electric & Gas		
Telephone	973 430-6374	Fax	973 242-6074
E-mail	arthur.giardino@pseg.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
<input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: It is premature to continue development of this SAR until FERC has specified the organization to be responsible for the development of wholesale electric standards.			

SAR Commenter Information

Name SERC Compliance Subcommittee

Organization SERC (Contact = Nancy Fallon)

Telephone 704-892-6026

Fax

E-mail nfallon@serc1.org

Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

The scope of the SAR should be expanded to include: sufficient detail to provide a clear understanding of the specific functions covered by this SAR.

The scope of the SAR should be reduced to eliminate:

Other comments: Applicability should not be limited to the Reliability Authority, Balancing Authority and Transmission Operator, but should include all operational entities (if you are operating, you have to stay within your defined limits).

<i>SAR Commenter Information</i>	
Name	SERC OPWG
Organization	SERC (Contact = Nancy Fallon)
Telephone	704-892-6026
	Fax
E-mail	nfallon@serc1.org
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: See comments below</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: Applicable Functions: Interchange Authority should be checked because of the definition of "Interchange Schedule" in NERC Operating Policy 3, since schedule implies the actual implemented energy flow. The "Assess Transmission future needs and develop transmission plans" SAR does not state a requirement to plan the system so that it can be operated within Operating Limits, therefore, we feel that the Planning Authority should be checked as applicable for this SAR.</p> <p>The term "operating limits" is used in this SAR as in the "Determine Facility Ratings" SAR. Please see our comments concerning OSL/OSLV for that SAR and ensure that terms are consistent and defined appropriately.</p> <p>Please note that there should be a companion SAR to this that requires LSEs, distribution providers, and generators to respond to requests that will have the effect of operating the system within Operating Limits.</p>	

<i>SAR Commenter Information</i>	
Name	Gary Won and Don Tench Comments submitted on behalf of the Independent Electricity Market Operator (IMO)
Organization	Independent Electricity Market Operator (IMO)
Telephone	905-855-6427
Fax	905-855-6372
E-mail	gary.won@theimo.com and don.tench@theimo.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments:</p> <ol style="list-style-type: none"> 1. The word "Reliability" is missing from the title of the proposed standard. 2. The title and brief description of the proposed standard refer to "Transmission Reliability". This may be misleading and may imply that the new standard would apply to the transmission function only. The standard should address the reliability of the bulk electric system. 3. Various terms for bulk electric system have been used, e.g. "bulk electric transmission system" (Purpose/Industry Need), "bulk transmission system" (Reliability Function) and the "interconnected bulk electric systems" or "bulk electric systems" (Reliability and Market Interface Principles). The terminology should be standardized and consistent. 4. Considering the idea of the NERC White Paper that the description for each proposed standard should identify <u>WHAT</u> performance must be achieved, rather than detailing <u>HOW</u> to achieve that performance, the title of this SAR could be simplified to focus on the "Operating Within Limits". 	

<i>SAR Commenter Information</i>	
Name	David Scarpignato
Organization	Baltimore Gas & Electric
Telephone	410-597-7593
	Fax
E-mail	scarp@bge.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: The promulgation for comment of these SARs is premature. The industry "standard making process" is in a transition phase and it is overly burdensome to devote resources at this time. Once legislation or FERC firmly determines which entity(ies) is responsible for standards it will make sense to move forward with said entity.</p> <p>Even if NERC wants to cover reliability standards, almost all standards have a reliability and commercial impact; thereby, necessitating developing a single process that incorporates both commercial and reliability aspects of standards development. The current NERC process risks being changed soon, discounts commercial aspects, and is not part of a finalized overall industry process.</p> <p>Waiting a short while to move forward on a new standards setting process is acceptable and prudent given that NERC standards are currently in place and the industry can continue to use these standards until the new process and standards setting organization(s) are firmly set.</p>	

SAR Commenter Information

Name R. Scott Henry, Chairman

Organization Interconnected Operations Services Subcommittee, NERC

Telephone (704) 382-6182

Fax

E-mail rshenry@duke-energy.com

Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

SAR Commenter Information

Name Jim Cyrulewski
Manager -Michigan Electric Power Coordination Center

Organization Michigan Electric Coordinated Systems (MECS)

Telephone 734-665-3628

Fax 734-665-3480

E-mail cyrulewskij@dteenergy.com

Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

<i>SAR Commenter Information</i>	
Name	Kent Saathoff
Organization	Kent Saathoff
Telephone	(512)225-7011
Fax	(512)225-7020
E-mail	ksaathoff@ercot.com
Comments	
<p>This SAR and the other posted SARs provide an appropriate framework for transitioning existing NERC Operating Policies and Planning Standards into new, NERC Organization Standards. Multiple compliance measures may be defined and developed for each of the eleven proposed Organization Standards. The Organization Standards and related compliance measures should focus on what functions must be performed for reliability, on who is responsible for each compliance measure for each required function and not, on how the compliance measure is achieved. The compliance measure must be measurable or demonstrable to ensure compliance.</p> <p>Adherence to transmission system operating limits is a core reliability requirement and should be addressed by a Standard. Requirements for monitoring real time loading against operating limits and compliance measures for determining those limits are certainly appropriate.</p> <p>Compliance measures for correcting limit violations must make allowance for the various mechanisms in place and being developed to provide market solutions to remedy transmission congestion. These mechanisms are very different from the old "command and control" procedures that are the basis of existing NERC policies. All standards must be crafted to allow market solutions to work while still maintaining system reliability.</p>	

<i>SAR Commenter Information</i>			
Name	Ronald Gunderson		
Organization	MAPP Reliability Council		
Telephone	(402)845-5252	Fax	(402)845-5205
E-mail	rogunde@nppd.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: The use of the term "etc." in the SAR description leaves the scope of this SAR open-ended. The scope of the SAR should be stated and complete.			

SAR Commenter Information

Name Linda Clarke

Organization Exelon Corporation

Telephone (610) 765-6698

Fax (610) 765-6698

E-mail lclarke@pwrteam.com

Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

The scope of the SAR should be expanded to include:

The scope of the SAR should be reduced to eliminate: The procedures on how to alleviate overloads (i.e., TLRs) and other limit violation.

SAR Commenter Information

Name Carter B. Edge

Organization Southeastern Power Administration

Telephone 706-213-3855

Fax 706-213-3884

E-mail cartere@sepa.doe.gov

Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

The scope of the SAR should be expanded to include:

The scope of the SAR should be reduced to eliminate:

Other comments: Planning Authority should be included.

<i>SAR Commenter Information</i>			
Name	Warren Schaefer		
Organization Dairyland Power Cooperative			
Telephone	608/787-1252	Fax	608/787/1327
E-mail	wjs@dairynet.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: The use of the term "etc." in the SAR description leaves the scope of this SAR open-ended. The scope of the SAR should be stated and complete.			

<i>SAR Commenter Information</i>	
Name	Mike Miller
Organization	Southern Company
Telephone	205 257 7755
Fax	6663
E-mail	mbmiller@southernco.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: See comments below</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: Applicable Functions: Interchange Authority should be checked because of the definition of "Interchange Schedule" in NERC Operating Policy 3, since schedule implies the actual implemented energy flow. The "Assess Transmission future needs and develop transmission plans" SAR does not state a requirement to plan the system so that it can be operated within Operating Limits, therefore, we feel that the Planning Authority should be checked as applicable for this SAR.</p> <p>The term "operating limits" is used in this SAR as in the "Determine Facility Ratings" SAR. Please see our comments concerning OSL/OSLV for that SAR and ensure that terms are consistent and defined appropriately.</p> <p>Please note that there should be a companion SAR to this that requires LSEs, distribution providers, and generators to respond to requests that will have the effect of operating the system within Operating Limits.</p>	

<i>SAR Commenter Information</i>			
Name	D. Piatt		
Organization	Southern Company		
Telephone	(205) 257-4222	Fax	(205) 257-1040
E-mail	DGPIATT@southernco.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			

SAR Commenter Information

Name Jon. Loesch

Organization FirstEnergy Solutions

Telephone 330-315-7313

Fax 330-315-6773

E-mail LoeschJ@FirstEnergyCorp.com

Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

The scope of the SAR should be expanded to include:

The scope of the SAR should be reduced to eliminate: the responsibility of the Balancing Authority, which has no bearing on this standard/objective.

<i>SAR Commenter Information</i>	
Name	Ray Morella
Organization	FirstEnergy Corp
Telephone	330.336.9831
Fax	330.336.9024
E-mail	morellar@firstenergycorp.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: One of the major problems confronting the industry today is in the identification of real-time system limits and operating conditions. Viable communications protocol need to be developed and implemented that will correctly monitor and assess the electric system in a real-time mode. Establishment of a dynamic and valid real-time data system that will accurately depict system conditions will further enable our industry to maximize its potential. We must be able to define short term system requirements and operational limits in such a manner as to promote the efficient and reliable use of the transmission grid. Partial path reservations and also real-time modifications of transmission scheduling need to be addressed in a more accurate manner. The accuracy and timely assessment of current operating limits need to be reviewed, studied, and validated in a sequence that will not inhibit the real-time operations of the system. The development of established limits, and the assessment and comparison of those limits in a real-time environment, will insure that transmission operations will be able to react to the current use that is imposed on the system in a reliable and safe manner.</p>	

<i>SAR Commenter Information</i>			
Name	Scott Helyer		
Organization	Tenaska		
Telephone	817-462-1512	Fax	817-462-1510
E-mail	shelyer@tnsk.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

SAR Commenter Information

Name Kenneth A. Githens

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Fax 412-856-2912

E-mail kgithen@alleghenyenergy.com

The scope of the SAR should be reduced to eliminate: Today short-term transmission reliability issues are addressed by congestion management either thru TLR curtailments, LMP or other methods. FERC's proposed SMD requires congestion management in all markets using LMP. Congestion management is a market issue. Therefore, this standard should be developed in a process which takes into account market and reliability interests.

<i>SAR Commenter Information</i>			
Name	Chifong Thomas		
Organization	Pacific Gas and Electric Company		
Telephone	(415) 973-7646	Fax	(415) 973-8804
E-mail	clt7@pge.com		
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>			
Name	Ed Riley		
Organization California ISO			
Telephone	(916) 351-4463	Fax	(916) 608-5906
E-mail	eriley@caiso.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: Change title to " Monitor Transmission Reliability - Operate within Limits". SAR should be re-written to say "Establish a standard that requires adherence to operating limits. Requirements shall include items such as monitoring of system parameters against operating limits, and correcting limit violations".			

<i>SAR Commenter Information</i>			
Name	Marv Landauer		
Organization BPA			
Telephone	360-619-6602	Fax	360-619-6945
E-mail	mjlandauer@bpa.gov		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: Will the standards used here to determine if the system is operated within limits be the same standards that will be used to plan the system?			

<i>SAR Commenter Information</i>			
Name	Francis J Halpin		
Organization Bonneville Power Administration - Power Business Line			
Telephone	503 230 3000	Fax	503 230 5669
E-mail	fjhalpin@BPA		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: Change to: prevent and correct limit violations. Add Generator and LSE to the list of Functions to which this standard would apply. Load dropping can be used as a tool to prevent and correct violations. Generation is critical in the areas of Reactive, Voltage, Frequency, and Reserves. Generators are used extensively in preventing and correcting limit violations.			

SAR Commenter Information

Name Edward Stoneburg

Organization Illinois Power Company

Telephone (217) 362 6363

Fax

E-mail edward_stoneburg@illinoispower.com

Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

The scope of the SAR should be expanded to include:

The scope of the SAR should be reduced to eliminate: Balancing Authority: In reviewing a Balancing Authorities responsibilities, it does not appear to Illinois Power that the BA has any responsibility to Monitor and Assess Short-term Transmission Reliability, and therefore would not be subject to this Standard. Eliminate all references to HOW this standard would be met such as real time monitoring, data, communications, particular analysis, and timing. These tend to be issues as to HOW to achieve the standard not what the standard should be.

Other comments: The SAR indicates that this standard would apply to Generators and Distribution Providers. Today NERC Policy and Standards do not apply to these Functions. For example, NERC has no authority to require its standards to be applied to determine connection requirements for distribution facilities. And the application of NERC standards to Independent Generators are carried out by transmission owners through interconnection agreements. Is NERC proposing that this will change and they will begin to impose standards directly on distribution providers and generators?

There is inadequate detail in the SAR to determine if the scope of the SAR is appropriate and adequate. The scope should not include and requirements on HOW to deal with the prevention or correction of limit violations.

<i>SAR Commenter Information</i>			
Name	Saif Mogri		
Organization WECC Technical Studies Subcommittee			
Telephone	(213)367-0447	Fax	(213)367-0457
E-mail	smogri@email.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

SAR Commenter Information

Name Gerald N. Rheault

Organization Manitoba Hydro

Telephone (204) 487-5423

Fax (204) 487-5360

E-mail gnrheault@hydro.mb.ca

Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

The scope of the SAR should be expanded to include:

The scope of the SAR should be reduced to eliminate:

Other comments: The Industry Need has not been defined for this SAR.

SAR Commenter Information

Name Donald D. Taylor, PE

Organization Westar Energy

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Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

SAR Commenter Information

Name Frank A. Venhuizen

Organization NIPS (Northern Indiana Public Service Co.)

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Fax (219) 647-5663

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Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is