Please **DO NOT** use this form. Please use the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=c61341c02f23454b9afc0f766aeaa9f9) to submit comments on the first draft of the Project 2010-17: Definition of the Bulk Electric System (BES) Technical Principles for Demonstrating BES Exceptions. **Only** submit comments on the first draft Technical Principles for Demonstrating BES Exceptions. The comments must be submitted by **June 10, 2011.**

If you have questions please contact Ed Dobrowolski at [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net) or by telephone at 609-947-3673.

### **Background Information**

### **Definition of the BES (Project 2010-17)**

In parallel with the definition project, another stakeholder team outside the standards development process has been set up to develop a change to the NERC Rules of Procedure (ROP) to allow for entities to apply for excluding Elements from the BES that might otherwise be included according to the proposed definition and designations. This same process would be used by Registered Entities to justify including Elements in the BES that might otherwise be excluded according to the proposed definition and designations. This process would also be utilized for those situations where the core definition and designations do not clearly identify whether an Element is BES or not. The ROP team will develop the process for seeking an exception from the definition and designations, but the Definition of the BES Standards Drafting Team (DBESSDT), through the standards development process, has developed the criteria necessary for applying for an exception.

The exclusion exception process has been set up as a choice between two alternative forms of evidence. The first choice is seen as less onerous in nature as it does not require extensive technical analysis. An entity must choose which path it wants to pursue.

The inclusion exception process requires more detailed analysis and only one choice is provided.

The first draft of the criteria that has been posted contains the evidence that must be presented by an entity seeking an exception as well as specific criteria for how that evidence will be evaluated. The SDT is seeking industry feedback not just on the approach being presented but also on the specific numeric thresholds that will be used. Comments received from this posting will help to determine the final criteria that the industry will be required to adhere to. Therefore, industry feedback is vital to the development process.

It should be noted that the actual application process is described in the Rules of Procedure document that has been posted concurrent with the criteria document.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.*

1. Exclusions - The SDT has set up one path for evidence that does not include extensive technical analysis. It consists of 4 items, all of which must be addressed in order to submit a completed request for exclusion. The first item involves proximity to Load and requests industry feedback on how to measure this variable. Do you agree with this requirement? If you do not support this requirement or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. In addition, in the comment field, please provide your thoughts on the appropriate impedance value to replace ‘TBD,’ including technical rationale for your argument.

Yes:

No:

Comments:

1. Exclusions - The SDT has set up one path for evidence that does not include extensive technical analysis. It consists of 4 items, all of which must be addressed in order to submit a completed request for exclusion. The second item involves Element(s) treated as radial. Do you agree with this requirement? If you do not support this requirement or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

Yes:

No:

Comments:

1. Exclusions - The SDT has set up one path for evidence that does not include extensive technical analysis. It consists of 4 items, all of which must be addressed in order to submit a completed request for exclusion. The third item involves power flow. Do you agree with this requirement? If you do not support this requirement or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. In addition, in the comment field, please provide your thoughts on the appropriate MWh value to replace ‘TBD,’ including technical rationale for your argument.

Yes:

No:

Comments:

1. Exclusions - The SDT has set up one path for evidence that does not include extensive technical analysis. It consists of 4 items, all of which must be addressed in order to submit a completed request for exclusion. The fourth item involves power transport. Do you agree with this requirement? If you do not support this requirement or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

Yes:

No:

Comments:

1. Exclusions - The SDT has set up one path for evidence that includes technical analysis. Do you agree with this requirement? If you do not support this requirement or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. In addition, in the comment field, please provide your thoughts on the proposed metrics for analysis and the appropriate values to replace ‘TBD,’ including technical rationale for your argument.

Yes:

No:

5a. Comments on approach:

5b.Comments on distribution factor measurement:

5c. Comments on allowable transient voltage dip measurement:

5d. Comments on allowable transient frequency response:

5e. Comments on voltage deviation measurement:

1. Exclusions – Do you have other methods that may be appropriate for proving an exclusion claim? Or, other variables/measurements that may be added to the requirements already shown in the posted *Technical Principles for Demonstrating BES Exceptions*? If so, please provide your comments here with technical rationale for why they should be considered.

Yes:

No:

Comments:

1. Inclusions - The SDT has set up only one path for evidence that includes technical analysis. Do you agree with this requirement? If you do not support this requirement or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. In addition, in the comment field, please provide your thoughts on the proposed metrics for analysis and the appropriate values to replace ‘TBD,’ including technical rationale for your argument.

Yes:

No:

7a. Comments on approach:

7b. Comments on distribution factor measurement:

7c. Comments on allowable transient voltage dip measurement:

7d. Comments on allowable transient frequency response:

7e. Comments on voltage deviation measurement:

1. Do you have concerns about an entity’s ability to obtain the data they would need to do the indicated technical analyses? If so, please be specific with your concerns so that the SDT can fully understand the problem and address it in future drafts.

Yes:

No:

Comments:

1. Are you aware of any conflicts between the proposed approach and any regulatory function, rule order, tariff, rate schedule, legislative requirement or agreement, or jurisdictional issue? If so, please identify them here and provide suggested language changes that may clarify the issue.

Yes:

No:

Comments:

1. Are there any other concerns with this approach that haven’t been covered in previous questions and comments? Please be as specific as possible with your comments.

Yes:

No:

Comments: