NORTH AMERICAN ELECTRIC RELIABILITY COUNCIL
Princeton Forrestal Village, 116-390 Village Boulevard, Princeton, New Jersey 08540-5731

RESOLUTION ON DEVELOPMENT OF VERSION 0 OF RELIABILITY STANDARDS

RESOLVED, that having participated in discussions of the Stakeholders Committee with respect to the appropriate scope of Version 0 of the reliability standards and appreciating the importance to the entire industry of achieving consensus on Version 0 in a timely manner, it is the sense of the board that:

A. A satisfactory resolution, for the purposes of Version 0, of the reliability coordinator/reliability authority issue would be to include in Version 0 the roles and responsibilities of reliability coordinators and to omit references to reliability authorities.

B. A satisfactory resolution of the issues regarding Phases III and IV of the Planning Standards would be to:

(1) develop reliability standards covering the Phase III and Phase IV issues separate from the Version 0 effort, using the NERC standards development process;
(2) have the Planning Committee expeditiously complete the drafting of the proposed standards needed to address the Phase III and Phase IV issues, and
(3) move those standards through the NERC standards development process as promptly as possible, but not later than the May 2005 board meeting.

Approved by NERC Board of Trustees: October 15, 2004

REGIONAL MANAGERS COMMITTEE

1515 BROADWAY, 43RD FLOOR, NEW YORK, NEW YORK 10036-8901
(212) 840-1070 · FAX (212) 302-2782

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RICHARD BULLEY - MAIN
CHARLES YEUNG - SPP
LOUISE MCCARREN – WECC

October 15, 2004

Mr. Gerry W. Cauley
Director-Standards
North American Electric Reliability Council
Princeton Forrestal Village
116-390 Village Boulevard
Princeton, New Jersey 08540

Dear Gerry,

The Regional Managers Committee believes that the approval of Version 0 reliability standards is of utmost importance to the industry and NERC. As such, we believe that in order to increase the chance of approval, the Version 0 drafting team needs to eliminate as much confusion as possible in preparing the next draft for ballot.

We recommend that until such time as the question of Reliability Authority (RA) and Reliability Coordinator (RC) is resolved, the RA should not be included in the Version 0 standards and the RC should be retained. All operating reliability, control area and operating authority functions should be assigned as applicable to the RC, Balancing Authority and/or Transmission Operator.

We also recommend that NERC move expeditiously in reviewing the Functional Model and making the appropriate changes to alleviate as much confusion as possible between RA and RC responsibilities and authorities. Version 0 registration, currently scheduled for January 28, 2005, should address only those entities identified in Version 0 standards.

We agree with and support the drafting team's recommendation to remove the Phase 3 and 4 planning standards from the Version 0 standards. We also recognize that the Phase 3 and 4 planning standards are very important in protecting the reliability of the North American bulk electric system. Therefore, we recommend these standards not be included in Version 0 and that they be developed as quickly as possible in the next phase of standards development, with the objective that they be completed in the next six months.

If these steps are taken, the Regional Managers Committee would unanimously support approval of Version 0.

Sincerely;

Ed Schwerdt

Edward A Schwerdt
Chair, Regional Managers Committee

CC: Mr. Don Benjamin
NERC BOT Members

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

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DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**John Horakh - 09-27-2004**	
Organization:	**MAAC**	
Telephone:	**609-625-6014**	
Email:	**john.horakh@conectiv.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☒ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☒	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments
There should be a note included, as part of the Version 0 Standards, that states the requirements assigned to current Reliability Coordinators will be reassigned to Reliability Authorities, if/when the NERC Functional Model is implemented.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
Keeping responsibilities separated as much as possible is the way to go.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Version 0 should only reflect current approved policy, not possible future revisions, even if the revisions seem needed/likely.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

The Version 0 Standards should contain only standard material. Guide material, if needed, should be kept in a separate document, but a reference to that guide document should be allowed in the Standard. The phrase Shall Be Considered in a Standard Attachment is not appropriate because there is no way to measure compliance, that is, did the entity consider this item. Attachment 027-1, as written, seems more like Requirements for the Standard, rather than Guides. It uses the words must and shall, which are requirements. The title says Elements for Consideration, but the lead sentence says The Restoration Plan must consider the following requirements. Even some of the numbered items are written as requirements. For example, item 7 says Documentation must be retained. Attachment 031-1, on the other hand, is written as a Guide, using the words suggested and should. This is a very long Guide, 35 pages, which is another reason to put it in a separate document.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Deleting the Planning Standards derived from Phase 3 and Phase 4 is clearly the right way to go. However, it is important to follow the recommended plan to enter the deleted Phase 3 and Phase 4 material into the full development process as SARs, either regular or Urgent Action. Otherwise, some valuable material could be left out of the NERC Reliability Standards. It is also important to process the deleted material that is related to the blackout recommendations using Urgent Action SARs, as recommended. This material needs to be quickly moved into the NERC currently approved standards area.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

Section 054.3, which allows entities to question the methodologies and values calculated for TTC and ATC, seems mostly business related. The actual methodologies used and values calculated in Sections 054.1 and 054.2 seem mostly reliability related.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
Sections 055.3 and 055.4, which deal with how CBM is used, seem mostly business related. Sections 055.1 and 055.2, which deal with CBM calculation methodologies and values, seem mostly reliability related.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Both Sections deal with TRM calculation methodologies and values, and seem mostly reliability related.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☐ No.

Comments
The Distribution Provider was NOT added to the list of entities that must comply with Standard 060.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
We don't need any more complications right now.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
No show stoppers now.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

NORTH AMERICAN ELECTRIC RELIABILITY COUNCIL

Princeton Forrestal Village, 116-390 Village Boulevard, Princeton, New Jersey 08540-5731

September 30, 2004

TO: OPERATING COMMITTEE

Dear Members:

Reliability Coordinators Versus Reliability Authorities in Version 0 Reliability Standards

At their September 14 and September 15–16 meetings, the Reliability Coordinator Working Group (RCWG) and Operating Reliability Subcommittee (ORS) had a detailed discussion of draft 2 of the Version 0 reliability standards. This draft incorporates *both* the Reliability Coordinator and the Reliability Authority. There was concern expressed regarding registration of both the RC and RA functions and the potential confusion between the relationships and responsibilities. This may result in harming reliability in the interim until the RC and RA functions are clearly defined and agreed upon.

After considerable discussion, the ORS and RCWG approved the following motion in separate ballots:

> Moved that 1) where Reliability Coordinators are referenced in today's operating policies, they be translated to Reliability Authorities in Version 0, and 2) for the initial registration only those organizations that are RCs today shall register as RAs.

In addition, the RCWG and ORS members will submit individual comments to the Version 0 Standard Drafting Team by the October 15 deadline.

Sincerely,

Roger C. Harszy

Roger C. Harszy
Chairman, Operating Reliability Subcommittee

James D. Castle

James D. Castle
Chairman, Reliability Coordinator Working Group

/bsb

cc: Reliability Coordinator Working Group
Operating Reliability Subcommittee
Version 0 Drafting Team

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

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A revision to Question 7 is the only change that has been made.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Robert Blohm**	
Organization:	**Applied Statistician**	
Telephone:	**609 585 5451**	
Email:	**rb112@columbia.edu**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☐	1 - Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

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☐ Agree.

☐ Disagree.

Comments
I answer only questions 6, 8, 10, 11, 12, 13

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
I answer only questions 6, 8, 10, 11, 12, 13

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

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DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments
I answer only questions 6, 8, 10, 11, 12, 13

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments
I answer only questions 6, 8, 10, 11, 12, 13

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments
I answer only questions 6, 8, 10, 11, 12, 13

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments
I answer only questions 6, 8, 10, 11, 12, 13

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Reportable Disturbance	☐ Delete ☐ Add ☒ Modify	**Delete this definition & restore the definition that was contained in the "Supporting Notes" that were contained in Draft1 of Standard 2 but deleted from Draft2**
Reportable Disturbance	☐ Delete ☐ Add ☒ Modify	**See answer to question 13 for further justification**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
I answer only questions 6, 8, 10, 11, 12, 13

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments
See answer to Questions 8 & 13

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
See answers to Questions 8 & 13

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

See answer to Questions 8 & 13

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
2.0	☒ R ☐ M Number	**Restore the "Supporting Notes" contained in Draft 1. They define the "scope" of the standard during multiple contingencies. No mandate and no notification was given for the sudden omission of the "Supporting Notes" from Draft 2. Without the "Supporting Notes" to which Policy 1 Section 2.5 was "mapped" into, the Standard is inoperable in the case of multiple contingencies. Policy 1 exempted recovery from multiple contingencies. Accordingly, the current Draft-2 misrepresents Policy 1.**
2.0	☒ R ☐ M Number	**Restore the Policy 1 Section 2.4 definition of "reportable disturbance" that was contained in the "Supporting Notes" contained in Draft-1 but dropped from Draft-2, and that was replaced in Draft-2 by a glossary definition of "reportable disturbance" that misrepresents Policy 1. See comment to this definition in next box below and in answer to question 8.**
2.0	☒ R ☐ M Number 0.0	**Glossary leaves the definition of "reportable disturbance" entirely to the Regional Reliability Organizations provided it's at least 80% of the worst contingency.To the contrary, the definition in Policy 1 & in the "Supporting Notes" (a) excluded "normal" operating characteristics, (b) specified only sudden, unanticipated losses of "supply-side" resources, & (c) allowed RROs to "reduce" the 80% threshold. So glossary definition is both more restrictive ("at least 80%") and broader (loss of load)**
8.0	☒ R ☐ M Number	**The all-important wording "Cannot withstand next contingency" that exempts multiple-contingency recovery during the 30-minute recovery period in the Policy 2 diagram A.1.1 was never translated into the version-0 Standard. Accordingly, the current Draft-2 misrepresents Policy 2, renders IROL Standard 8 inoperable in the case of multiple contingencies, and renders IROL Standard 8 inconsistent with Policy 1 and with faithful rendering of DCS Standard 2 that exempts multiple-contingency recovery.**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **SERC Planning Standards Subcommittee (PSS)**

Lead Contact: Bob Jones (PSS Chair)

Contact Organization: Southern Company Services

Contact Segment: 1

Contact Telephone: (205) 257-6148

Contact Email: rajones@southernco.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Kham Vongkhamchanh	Entergy	SERC	1
Brian Moss	Duke Power Co.	SERC	1
Art Brown	SCPSA (Santee Cooper)	SERC	1
David Weekley	MEAG Power	SERC	1
Pat Huntley	SERC	SERC	2

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments
No response.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
No response.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments
No response.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments
No response.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

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- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

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On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

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- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

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- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
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- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

The ATC portions of Standard 054 address business practices and should be deleted from Version 0. The TTC portions address reliability issues and should be retained in Version 0.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
Standard 055 address business practices and should be deleted from Version 0.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Standard 056 addresses a reliability issue and should remain a part of Version 0.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☒ Yes.

☐ No.

Comments

References to Distribution Provider compliance within Standard 060 are not included in the draft document provided for review. While this Standard is potentially applicable to and associated with specific generation connections, protection schemes, and end-use applications, all references to Distribution Provider compliance within these Standards should be carefully worded to specify Generation/Transmission/ Distribution interface issues so as to avoid attempts to impose or misinterpret bulk electric system reliability standards on distribution system reliability practices. In general, this appears to have already been done (for example, Standard 063.2 Analysis and Reporting of Transmission Protection System, Misoperations, states: The Transmission Owner, Generator Owner, Distribution Provider that owns transmission protection system(s) shall analyze all protection system misoperations and shall take corrective actions to avoid future misoperations. This example attempts to clearly require Distribution Providers that own transmission protection schemes to address misoperations of these transmission schemes and is not intended impose these requirements for other distribution-specific protection schemes.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
"Unaffiliated Third Party"	☐ Delete ☒ Add ☐ Modify	**Not clear if this was intended to be NERC or some other organization(s).**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
If a change is made, it should be done now and not later.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
None.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

1. In some cases NERC was changed to "Unaffiliated Third Party" and in other cases reference to NERC was retained. What is the intent "Unaffiliated Third Party"? Why was "Unaffiliated Third Party" not substitited for NERC in all cases?

2. All the standards need to be reviewed for consistency (e.g., Load Serving Entity versus Load-serving Entity), punctuation, and proper grammar.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.1	☒ R ☐ M Number 1.0	**Need to define valid assessment or state that if the listed items are included then the assessment is valid.** **This also applies to 51.2, R-1; 51.3, R-1; and 51.4, R-1.**
51.1	☐ R ☒ M Number 1.0	**Revise the following "provided assessments and corrective plans" to read "performed assessments and developed corrective plans ." M1-1 refers to the requirements R1-1 and R1-2. These requirements are for performing assessments and developing corrective plans. The providing requirements is R1-3. Therefore, M1-1 should say performed assessments and developed corrective plans, not provided them.** **This also applies to 51.2, M-1; and 51.3, M-1.**
51.1	☐ R ☒ M Number 2.0	**Delete - "None Identified"**
51.2	☒ R ☐ M Number 2.0	**Change the word "their" to "its" in the first sentence in item a).**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.4	☒ R ☐ M Number 1.0	**Remove the last sentence "The controlled interruption of customer demand, the planned removal of generators, or the curtailment of firm (non-recallable reserved) power transfers maybe necessary to meet this standard." This sentence is not correct since this measurement has assestment requirement only, and no corrective actions required.**
51.4	☐ R ☒ M Number 1.0	**Revise the following "shall provide assessments" to read "shall provide evidence that it performed assessments." M4-1 refers to the requirements R4-1. This requirement is for performing assessments. The providing requirement is R4-2. Therefore, M4-1 should say provide evidence that it performed assessments, not provided them.**
51.4	☐ R ☒ M Number 2.0	**In M4-2, change the reference "051.4 R4-1" to "051.4 R4-2."**
52.1	☒ R ☐ M Number 2.0	**Delete the second "shall" in the sentence.**
53.1	☐ R ☒ M Number 2.0	**Delete the phrase "for generation facilities, transmission facilities, and end-user facilities" from the measurement. R1-1 requires that facility connection requirements cover generation facilities, transmission facilities, and end-user facilities. R1-2 requires that the facility connection requirements contain the 16 items given. Since M1-2 refers to the requirements in R1-2, there is no need for the words "generation facilities, transmission facilities, and end-user facilities" in M1-2.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
53.2	☒ R ☐ M Number 1.0	**Revise the following to read "R 2-1. The Generator Owner, Transmission Owner, Distribution Provider, or Load Serving Entity seeking to integrate generation facilities, transmission facilities, and electricity end-user facilities shall coordinate and cooperate with the Transmission owner with which they seek to connect, and other appropriate entities, on their respective assessments." This change is needed to identify who should be coordinated with.**
53.2	☒ R ☐ M Number 1.0	**The phrase "evaluate the reliability impact of the new facilities and their connections on the interconnected transmission systems" is used redundantly in the introductory sentence and under item a).** **Delete the first occurrence.**
53.2	☒ R ☐ M Number 2.0	**Delete the word "council."**
54.0	☐ R ☐ M Number	**Purpose: The last sentence is redundant, delete it.**
54.1	☒ R ☐ M Number 1.0	**d). Reinsert the word "how" such that it reads "A description of how incomplete…"** **f). Change "Indication that treatment" to "An indication of the treatment..."** **g). Insert "A" at the beginning of the sentence.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
55.3	☒ R ☐ M Number 2.0	**Revise "their Capacity Benefit Margin use…" to "their Use of Capacity Benefit Margin…" Change all other occurrences in Levels of Non-Compliance 1 and 4.**
55.4	☒ R ☐ M Number 1.0	**Delete "Capacity Benefit Margin use" at the end of the last sentence.**
56.0	☐ R ☐ M Number	**Purpose: In the first sentence change the term "Transmission System Providers and Transmission Owners…" to "Transmission Service Providers..." changing "System" to "Service" and deleting the reference to Transmission Owners.** **The Functional Model implies that TRM is determined solely by Transmission Service Providers.**
58.1	☐ R ☐ M Number	**Timeframe: Change "058.2-R2-M1" to "058.2-R2-1".**
58.2	☒ R ☐ M Number 1.0	**Add the following after the first sentence: "The procedures shall include the identification of the entities responsible for the reporting of the data (referred to in 058.1 as 'Responsible Entity')".**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.3	☐ R ☐ M Number	**Change all references throughout the standard to "Reliability Standard 058.4-R4" and "Reliability Standard 058-R4" to "Reliability Standard 058.4-R4-1."**
58.4	☒ R ☐ M Number 1.0	**Add the following after the first sentence: "The procedures shall include the identification of the entities responsible for the reporting of the data (referred to in 058.3 as 'Responsible Entity')".**
58.4	☒ R ☐ M Number 1.0	**In item d), change the reference to "Reliability Standard 058.1-R1" to "Reliability Standard 058.1-R1-1."**
58.6	☒ R ☐ M Number 2.0	**To be consistent with 058.5 R5-1, combine 058.6 R6-2 with R6-1.**
60.0	☐ R ☐ M Number	**In both 060.1 and 060.2, to be consistent use either "methodology(ies)" or "methodology(s)." Both are now used at various places throughout the standards.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
60.1	☐ R ☐ M Number	**Levels of Non-compliance: Change references to "elements (1-5)" to "elements (a-e)."**
61.5	☐ R ☒ M Number 1.0	**The measurement does not appear to be addressing the focus of 061.5. Change the term "actual and forecast demand data was" to read "nonmember entity demand data and forecast uncertainties were."**
61.5	☐ R ☐ M Number	**Levels of Non-compliance: in Level 1 change "061.5-R51- items a) or 061.5-R51- b)" to read "061.5-R5-1 item a or b." In Level 2 change "061.5-R51- items a) and 061.5-R51-b)" to read "061.5-R5-1 items a and b."**
61.6	☒ R ☐ M Number 1.0	**Change "Regions" to "Regional Reliability Organizations."**
61.6	☐ R ☐ M Number	**Levels of Non-compliance, Level 4: While it is a direct transulation, the term "controlled demand-side management data" should be changed to "interruptible demands and direct control load management" to be consistent with the rest of the standard.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
61.7	☒ R ☐ M Number 1.0	**Change "system operators and security center coordinators" to "Reliability Authority(ies) and Transmission Operator(s)" to be consistent with 061.7 M7-1.**
61.8	☐ R ☒ M Number 1.0	**M8-1 is basically a repeat of R8-1. To be consistent with similar measurements, revise it to read: "The Load Serving Entity's, Planning Authority's and Resource Planner's forecasts shall each be clearly documented per Reliability Standard 061.8-R8-1."**
61.8	☐ R ☒ M Number 2.0	**M8-2 is basically a repeat of R8-2. To be consistent with similar measurements, revise it to read: "The Load Serving Entity's, Planning Authority's and Resource Planner's forecasts shall each include information per Reliability Standard 061.8-R8-2."**
63.2	☒ R ☐ M Number 1.0	**Add the word "and" between "Generator Owner" and "Distribution Provider."** **This also applies to R2-2.**
63.3	☒ R ☐ M Number 2.0	**Include Distribution Providers that owns transmission protection system(s). Since they are included in 62.2 they should also be included in 63.3.** **This change should also be applied to measures M3-1 and M3-2.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
67.0	☐ R ☐ M Number	**General Comments:** **1. There needs to be consistency in the use of either "Under Frequency" or "Underfrequency." The current compliance templates use "Underfrequency."**
67.1	☒ R ☐ M Number 1.0	**Un-capitalize the word "Program" in the first sentence and in item c.**
67.1	☐ R ☒ M Number 1.0	**Un-capitalize the words "Program" and "Current."**
67.2	☐ R ☐ M Number	**Levels of Non-compliance, Level-1: change the reference to "Reliability Standard 067.1-R1" to read "Reliability Standard 067.1-R1-1."**
67.4	☐ R ☐ M Number	**General Comment: Since load serving entities are not included in Standards 067.2 and 067.3, they should also not appear in 067.4.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
67.4	☒ R ☐ M Number 1.0	**Insert a comma between the words "program" and "shall," such that it reads "…required by the Regional Reliability Organization to have an underfrequency load shedding program, shall analyze…"**
67.4	☐ R ☒ M Number 1.0	**Change M4-1 to read: "The Transmission Owner's, Transmission Operator's, and Distribution Provider's (required by the Regional Reliability Organization to have an underfrequency load shedding program) analysis and documentation of underfrequency load shedding program performance following an underfrequency event shall include all elements identified in Reliability Standard 067.4-R4-1."This change is needed to fix the incorrect use of the apostrophe in the phrase "shedding program's analysis".**
68.0	☐ R ☐ M Number	**Purpose: Revise the end of the first sentence from "…requiring end users of electricity on the bulk electric system to drop loads" to read "requiring the interruption of electrical supply to end users."**
68.0	☐ R ☐ M Number	**General Comments:** **1. There needs to be consistency in the use of either "Under Voltage" or "Undervoltage." The original compliance templates used "Undervoltage."** **2. Since load serving entities are not included in Standard 067, they should also not appear in Standard 068.**
68.3	☐ R ☒ M Number 1.0	**Revise the phrase "shall include" to read "shall have an assessment which includes."**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
68.3	☐ R ☐ M Number	**Levels of Non-compliance, Level 4: revise the reference to "Reliability Standard 068.3-R3" to read "Reliability Standard 068.3-R3-1."**
69.3	☒ R ☐ M Number 2.0	**Change the term "Reliability Authorities" to read "Regional Reliability Organizations."**
69.3	☐ R ☐ M Number	**Levels of Non-compliance: Levels 1 and 2 use the phrase "The summary (or detailed) Regional Reliability Organization Special Protection System assessment," while Levels 3 and 4 use "The Regional Reliability Organization's summary (or detailed) Regional Reliability Organization Special Protection System assessment." This needs to be made consistent.**
70.1	☒ R ☐ M Number 1.0	**The Testing Frequency requirement listed in R1-1c should clarify that generator owners who own less than three blackstart units do not have to retest the same unit consecutively (every year) as long as the generator owner tests its blackstart unit(s) every three years.**
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

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A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **NERC Personnel Subcommittee**

Lead Contact: Earl F. Cass

Contact Organization:

Contact Segment:

Contact Telephone: 605-882-7550

Contact Email: cass@wapa.gov

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

After reviewing the language in the Draft 2 of version 0 standard 032, it was noticed that the wording concerning who should be certified has changed from what was in the Policy 8 version. Specifically the language in the approved Policy 8 is as follows:

Positions requiring NERC-Certified SYSTEM OPERATORS. An OPERATING AUTHORITY that maintains a control center(s) for the real-time operation of the interconnected BULK ELECTRIC SYSTEM, shall staff operating positions that meet both of the following criteria with NERC-Certified SYSTEM OPERATORS in accordance with the schedule in Standard 2:
Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected BULK ELECTRIC SYSTEM, and
Positions that are directly responsible for complying with NERC Operating Policies.

The P8T2 compliance template wording is as follows:

An Operating Authority that maintains a control center(s) for the real-time operation of the interconnected Bulk Electric System shall staff operating positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System, and positions that are directly responsible for complying with NERC Operating Policies, with NERC-Certified System Operators.

The language in draft 1 of version 0 contained the following: shall staff all operating positions that meet either of the following.....

Now the language in the draft 2 of version 0 standards contains the language change of shall staff all operating positions that meet either one or both of the following....

Our concern is that with the proposed language change the intent of the existing Policy 8 has been changed. Now for the sticky part. The PS believes that with the present language in the draft 2 version 0 standards the number of individuals that will need to be certified will significantly change to a larger number. We are not opposed to this language change and in fact we support it, but, it is a departure from what the intent of the present policy 8 was.

It would appear that the language in the draft 2 version 0 standard is following the language in the P8T2 template rather than the language in the approved Policy 8.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
32.0	☒ R ☐ M Number 1	**After reviewing the language in the Draft 2 of version 0 standard 032, see comment above**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

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Draft 2 of Proposed Version 0 Reliability Standards

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Karl Kohlrus**	
Organization:	**City Water, Light & Power**	
Telephone:	**217-321-1391**	
Email:	**kkohlrus@cwlp.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☒ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☒	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☒ Disagree.

Comments
The Reliability Coordinator is included in the NERC Functional Model, the Reliability Authority is in the NERC Functional Model.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☒ Do not agree with dropping these planning standards from Version 0.

Comments

I believe it is critically important that NERC include in its Version 0 standards the appropriate standards correcting deficiencies that led to the August 14, 2003 blackout.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

Distribution facilities are local in nature. Problems on these facilities will not have a major impact on the transmission interconnected network, certainly not enough to cause cascading transmission system outages over a wide area. Also, from a practical standpoint, there are many Distribution Providers including small municipals (over 2000). Adding these to entities which must comply with the Facility Ratings standard would be difficult to enforce and monitor.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

NERC keeps changing courses in midstream concerning standards. It's very confusing to the industry as to what the rules actually are. Let's finish one task before we start another!

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Standard 051 applies to both Planning Authorities and Transmission Planners. You can't have two people responsible for the same function. The standard should be clear in stating exactly what the Planning Authority should do and what the Transmission Planner should do. There should be separate standards for both the Planning Authority and the Transmission Planner even if they are similar.

Other standards suffer from this problem as well. Maybe we should return to the "Applicable to" language. Therefore, if I am a paricular entity as defined in the NERC Function Model, a quick sort could show all the standards that apply to me.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

I could not find the Glossary of Terms. I did a search on the NERC website and came up with an August 1996 document.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
54.1	☒ R ☐ M Number	**How come the Transmission Provider, e.g. RTO, not involved in this standard?**
60.2	☒ R ☐ M Number	**This standard applies to Generator Owners. I suppose this means the transmission-related terminal equipment such as transformers, breakers and substation equipment.** **There should be a separate standard on the rating of generating equipment including both MW and MVAR. Such a standard should also include standards for rating intermittent resources such as wind farms.**
61.7	☒ R ☐ M Number	**In the title who is a Security Center Coordinator? Did you mean Reliability Authority or Transmission Operator?**
72.1	☒ R ☐ M Number	**The Levels of Non-Compliance is not in a consistent format with other standards.**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☒ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:	**WECC Interchange Scheduling and Accounting Subcommittee**
Lead Contact:	Robert Schwermann
Contact Organization:	Sacramento Municipal Utility District (SMUD)
Contact Segment:	3
Contact Telephone:	916-732-5519
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Additional Member Name	Additional Member Organization	Region*	Segment*
Doug Frazier	Chelan PUD	WECC	
Marilyn Franz	SPP	WECC	
Bob Sullivan	CAISO	WECC	2
Bert Gumm	IPC	WECC	1
Jean Goff	SPP	WECC	
Shirley Buckmier	BPA	WECC	1
Al Guletzan	AESO	WECC	
Janella Battles	NEVP	WECC	1
Gary Dawes	NEVP	WECC	1

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SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

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☒ Agree.

☐ Disagree.

Comments

As mentioned, the goal of Version 0 was to establish reliability standards using the Functional Model language but without changing existing criteria. By adding the RC function, the Version 0 standards will reflect the way the western interconnection operates today. We support the inclusion of the RC function.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

We understood that the Version 0 standards are intended to migrate to Functional Model terminology, but retain current criteria. The model allows one entity to perform many functions (such as a TO or RA) or to perform just one function. We feel all functions should be retained to allow for maximum flexiability.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

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R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

The ISAS supports existing policy as presently stated in alternative A, as the alternative B is not equitable in our given paradigm. As we move to different methods of processing dynamic schedules we feel that an alternative method should be produced, although B is not the product we seek at this time. We also feel that R5.1 with 10% is too restrictive.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

We feel that the existing policies benefitted from the guides. As supporting documentation to the policies, they tended to bring clarity and expose intent. We support the standards effort and feel that guides should be included to provide clarity, but not for enforcement.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

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- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

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On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments
ISAS has no comment on this as it is outside our scope

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

These items TRM, etc. are reliability concerns and we feel that the relaiblity issues should not be part of NAESB. Reliability concerns should be addresed and then resultant market issues should be broken out later. "Yes" or "No" check box may not be a correct answer as there may be resultant NAESB items to flow out.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments
Same comment as above

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments
Same Comment

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☐ No.

Comments
Outside the scope of the ISAS comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
All version zero and new documents should have the same format

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

If ISAS was a voting entity in the NERC Standards Development Process, we would recommend voting yes if the concerns expressed in the previous questions were incorparted in the Version 0 standards.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
None, other than prior comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

None

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
6.0	☐ R ☐ M Number	**WECC has an inadvertant time-error payback methodology which we would continue to use. WECC would reserve the right to request a regional difference if the Version 0 standard does not support the WECC methodology.**
10.0	☒ R ☐ M Number R2b	**R2B appears to change current policy which was not in the scope of version zero. If the team were to change the current policy we would ask that the team review the need for instances longer than one hour for some tag situations as there may be some dynamic, or reserve tags that need adjustment outside a one hour time frame.**
11.0	☒ R ☐ M Number R1	**The existing Policy 3 and E-Tag 1.7 Specification provide for all GPEs to receive a copy of the tag and to optional particpate in the approval process. Both NERC's Version 0 standards and NAESB's Companion Business Practices should be reviewed to ensure that this existing capability is retained.**
13.0	☒ R ☐ M Number 5.0	**See prior ISAS comments to Dynamic schedules**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
13.0	☐ R ☒ M Number	**The WECC has its Reliability Management System (RMS) currently in place. Its sanctionable criteria has been shown to be equitable and should be used as a model. The text is the following boxes is the criteria which WECC has adopted. WECC may request a regional difference to preserve the WECC's RMS criteria if NERC criteria is not compatible.**
13.0	☐ R ☒ M Number	**Level 1- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 2% but less than or equal 3% of the total number of tags processed(approved tags plus denied tags) during the calendar month. For tag volumes less than or equal to 500 tags per month the number of noncompliant events was greater than 10 but less than or equal to 15. Level 2- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 3% but les**
13.0	☐ R ☒ M Number	**Level 2- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 3% but less than or equal to 4% of the total number of tags processed during the calendar month. For tag volumes less than or equal to 500 tags per month, the number of noncompliant events was greater than 15 but less than or equal to 20.**
13.0	☐ R ☒ M Number	**Level 3- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 4% but less than or equal to 5% of the total number of tags processed during the calendar month. For tag volumes less than or equal to 500 tags per month, the number of noncompliant events was greater than 20 but less than or equal to 25.**
13.0	☐ R ☒ M Number	**Level 4- For tag volumes of greater than 500 tags per month the number of noncompliant events was greater than 5% of the total number of tags processed during the calendar month. For tag volumes less than or equal to 500 tags per month the number of noncompliant events was greater than 25.**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **NERC Personnel Certification Governance Committee**

Lead Contact: David J. Carlson

Contact Organization:

Contact Segment:

Contact Telephone: 630-691-4480

Contact Email: david.carlson@exeloncorp.com

Additional Member Name	Additional Member Organization	Region*	Segment*
See NERC Roster			

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

The current NERC Operating Manual has a "Training Documents" and a "References" section attached to the manual after the "Appendixes". The PCGC believes that there is important information in these documents and believes that they should be added as attachments to the back of the Reliability Standards as the are now with the Operating Manual. These documents currently are shown a high degree of importance and very easy access by industry personnel since they are attached to the manual. If these documents are not attached to the standards they will no longer have the same degree of importance, commitment or ease of access.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

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Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Michael B. Hunter**	
Organization:	**Puget Sound Energy**	
Telephone:	**425 462-3006**	
Email:	**michael.hunter@pse.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☒	1 - Transmission Owners
☐ ECAR	☐	2 - RTOs, ISOs, Regional Reliability Councils
☐ FRCC	☐	3 - Load-serving Entities
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☐ SERC	☐	8 - Small Electricity End Users
☐ SPP	☐	9 - Federal, State, Provincial Regulatory or other Government Entities
☒ WECC		
☐ NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

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In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

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☒ Agree.

☐ Disagree.

Comments
Reliability Coordinator responsibilities must be spelled out in relation to the other "Authority" categories.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
None

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments
None

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments
Guides provide consistent information and should be included as attachments.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
Let's do it all at once.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments
Some areas should better distinguish between Reliability Authorities and Reliability Coordinators.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
None

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Clarify in Standard 018 that Reliability Coordinators can also issue a directive to a Reliability Authority. This is allowed as stated in Standard 037, R8.

In general, review the whole Version 0 even further to clarify the distinction of Reliability Coordinators and Reliability Authorities.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Eric Grant**	
Organization:	**Progress Energy - Florida**	
Telephone:	**727-384-7814**	
Email:	**eric.grant@pgnmail.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☒	1 - Transmission Owners
☐ ECAR	☐	2 - RTOs, ISOs, Regional Reliability Councils
☐ FRCC	☒	3 - Load-serving Entities
☐ MAAC	☐	4 - Transmission-dependent Utilities
☐ MAIN	☒	5 - Electric Generators
☐ MAPP	☐	6 - Electricity Brokers, Aggregators, and Marketers
☐ NPCC	☐	7 - Large Electricity End Users
☒ SERC	☐	8 - Small Electricity End Users
☐ SPP	☐	9 - Federal, State, Provincial Regulatory or other Government Entities
☐ WECC		
☐ NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☒ Disagree.

Comments

It is critical that neither the standards setting process, nor the functional model, impede the ability of utilities to fulfill their statutory obligations by dictating an RTO like structure or any other structure for the industry. The changes in draft 2 of Version 0 to replace Reliability Authority with Reliability Coordinator, and the portion of the instructional letter sent to the Regional Managers that limits registration of RCs, has such an effect.It must be recognized that the responsibility, authority, control and liability for the operation of the electric system in their service area is granted to utilites by the states in which they operate. Some states have authorized the transfer of these resposnibilites to organizations such as RTOs and ISOs. However, in other parts of the country, the states have taken no such action, and the utility cannot legally assign them to another entity. The utility may contract for certain tasks to be performed by another entity, such as an RC, but it may not delegate final authority, control, responsibility or liability to another entity.

There were no significant problems with incorporating the functional model Reliability Authority in draft 1 that support the change to the term Reliaiblity Coordinator . In addition, the term Reliability Coordinator is not used nor defined in the functional model. Further, the letter to the regional managers concerning functional registration seeks to limit what entities can provide certain relaibilty functions where it states " All organizations that serve as the existing Relaiblity Coordinators, and only those organizations, should register as Reliability Coordinators.....".

The change to Reliaiblity Coordinator in Version 0 draft 2, combined with the instructional letter, would dictate a particular industry structure and for many utilties, compliance would be in

violation of their state regulatory obligations. Such an outcome is unacceptable. Draft 1 of Version 0 recognized the current regulatory reality in the comments section of Standard 33 where it stated " For areas that intend to assign Relaiblity Authority functions to current control areas, those Relaiblity Authorities need to accept responsibility for the relaiblity coordination standards(33 to 44) while recognizing tasks may be assigned to others, including "upwardly" to a Reliability Coordinator". This is the correct and only acceptable appoach. It is clear that the intent in changing the language to RC is to prevent existing control areas from registering as RAs/RCs. However, it is not NERCs function to dictate industry structure and such efforts will be opposed by all available means.

In summary, Progress Energy believes that the term Reliaiblity Coordinator must be deleted from the Version 0 standards, and Reliaiblity Authority must be re-inserted as in draft 1 of Version 0. The comment in Standards 33 Version 0 draft 1 that begins "For areas that intend to assign Reliability Authority functions to current control areas....." must be re-inserted and highlighted. The drafting team must withdraw the portion of the instructional letter that directs only existing RCs to register as RCs. Further NERC should impose no limitations or "direction" with regard to who can register as RA, or any other functional entity.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
See response to Question 1.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Prefer to correct any deficiencies in future versions. For example, R5.2 might be revised to "+/- 25%" (not +/- 25 MWh). However, this change - as well as any other contemplated changes - would be more properly considered and receive the necessary due diligence in future versions.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

Guides "should" be considered. The use of "shall" with respect to the guides unnecessarily creates a burden to demonstrate consideration.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Agree on the basis that the standards are incomplete and have not been validated through field testing.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Total Transfer Capability (TTC) inherently contains Transmission Reliability Margin (TRM) and therefore should not be a NAESB business practice.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
As the name implies, Transmission Reliability Margin is required for solely for reliability purposes and should not be a NAESB business practice.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☒ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

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The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Agreement with the proposed numbering scheme is contingent upon the assumption that the numbering scheme has no relation to the resolution of comments offered in response to Questions 1 and 2.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Yes - Satisfactory resolution of the concerns identified in the responses to Questions 1 and 2 of this comment form is required prior to further consideration of the Draft 2 Version 0 standards.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

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Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
002	☐ R ☐ M Number	**Policy 1B, Section 2.5 regarding the "Treatment of Multiple Contingencies" is described in the Policy mark-up as being moved to "Supporting Notes" in the standard. The "Supporting Notes" were not included for review in the standard.**
008	☒ R ☐ M Number	**Comments from draft 1 indicated that requirement 5 should remain until version 1 is composed. While the drafting team agreed with this comment, requirement 5 is still lined out to indicate deletion.**
018	☐ R ☐ M Number	**The last part of the purpose appears to be missing a word or two (…return the transmission system normal conditions during and emergency).**
023	☒ R ☐ M Number 001	**Requirement 1 does not appear to be updated to include “their” as indicated on draft 1 responses.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
030	☐ R ☒ M Number 001	**Revise as follows to correct grammar: "Evidence that the Reliability Authority, Transmission Operator, and Balancing Authority operating personnel have the responsibility and authority to implement real-time actions that ensure the stable and reliable operation of the Bulk Electric System are documented and understood. Documentation shall include:"**
13.0	☐ R ☐ M Number	**The Levels of Non Compliance are not realistic for tags associated with dynamic schedules. The purpose of the tag is to reflect the power exchange that is currently accruing on the power system, but currently it is possible that the tag can get held or delayed which will result in a non compliance.**
013	☐ R ☐ M Number	**The Levels of Noncompliance and reset period are overly stringent for Balancing Authorities with multiple dynamic schedules. As currently written, failure to update a single tag requires performance over a full calendar year without a subsequent violation to achieve full compliance. Suggest reducing the compliance reset period to 3 months.**
013	☐ R ☐ M Number	**The data retention period and reset period do not appear to be aligned. The data retention period is 3 months and the compliance reset period is 1 year. Suggest revising the data retention period and compliance reset period to be equal (i.e., 3 months).**
	☐ R ☐ M Number	

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Draft 2 of Proposed Version 0 Reliability Standards

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Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Verne Ingersoll**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☒	1 - Transmission Owners
☐ ECAR	☐	2 - RTOs, ISOs, Regional Reliability Councils
☐ FRCC	☒	3 - Load-serving Entities
☐ MAAC	☐	4 - Transmission-dependent Utilities
☐ MAIN	☒	5 - Electric Generators
☐ MAPP	☐	6 - Electricity Brokers, Aggregators, and Marketers
☐ NPCC	☐	7 - Large Electricity End Users
☒ SERC	☐	8 - Small Electricity End Users
☐ SPP	☐	9 - Federal, State, Provincial Regulatory or other Government Entities
☐ WECC		
☐ NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☒ Disagree.

Comments

It is critical that neither the standards setting process, nor the functional model, impede the ability of utilities to fulfill their statutory obligations by dictating an RTO like structure or any other structure for the industry. The changes in draft 2 of Version 0 to replace Reliability Authority with Reliability Coordinator, and the portion of the instructional letter sent to the Regional Managers that limits registration of RCs, has such an effect.It must be recognized that the responsibility, authority, control and liability for the operation of the electric system in their service area is granted to utilites by the states in which they operate. Some states have authorized the transfer of these resposnibilites to organizations such as RTOs and ISOs. However, in other parts of the country, the states have taken no such action, and the utility cannot legally assign them to another entity. The utility may contract for certain tasks to be performed by another entity, such as an RC, but it may not delegate final authority, control, responsibility or liability to another entity.

There were no significant problems with incorporating the functional model Reliability Authority in draft 1 that support the change to the term Reliaiblity Coordinator . In addition, the term Reliability Coordinator is not used nor defined in the functional model. Further, the letter to the regional managers concerning functional registration seeks to limit what entities can provide certain relaibilty functions where it states " All organizations that serve as the existing Relaiblity Coordinators, and only those organizations, should register as Reliability Coordinators.....".

The change to Reliaiblity Coordinator in Version 0 draft 2, combined with the instructional letter, would dictate a particular industry structure and for many utilties, compliance would be in

violation of their state regulatory obligations. Such an outcome is unacceptable. Draft 1 of Version 0 recognized the current regulatory reality in the comments section of Standard 33 where it stated " For areas that intend to assign Relaiblity Authority functions to current control areas, those Relaiblity Authorities need to accept responsibility for the relaiblity coordination standards(33 to 44) while recognizing tasks may be assigned to others, including "upwardly" to a Reliability Coordinator". This is the correct and only acceptable appoach. It is clear that the intent in changing the language to RC is to prevent existing control areas from registering as RAs/RCs. However, it is not NERCs function to dictate industry structure and such efforts will be opposed by all available means.

In summary, Progress Energy believes that the term Reliaiblity Coordinator must be deleted from the Version 0 standards, and Reliaiblity Authority must be re-inserted as in draft 1 of Version 0. The comment in Standards 33 Version 0 draft 1 that begins "For areas that intend to assign Reliability Authority functions to current control areas....." must be re-inserted and highlighted. The drafting team must withdraw the portion of the instructional letter that directs only existing RCs to register as RCs. Further NERC should impose no limitations or "direction" with regard to who can register as RA, or any other functional entity.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
See response to Question 1.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Prefer to correct any deficiencies in future versions. For example, R5.2 might be revised to "+/- 25%" (not +/- 25 MWh). However, this change - as well as any other contemplated changes - would be more properly considered and receive the necessary due diligence in future versions.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

Guides "should" be considered. The use of "shall" with respect to the guides unnecessarily creates a burden to demonstrate consideration.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Agree on the basis that the standards are incomplete and have not been validated through field testing.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Total Transfer Capability (TTC) inherently contains Transmission Reliability Margin (TRM) and therefore should not be a NAESB business practice.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
As the name implies, Transmission Reliability Margin is required for solely for reliability purposes and should not be a NAESB business practice.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☒ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Agreement with the proposed numbering scheme is contingent upon the assumption that the numbering scheme has no relation to the resolution of comments offered in response to Questions 1 and 2.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Yes - Satisfactory resolution of the concerns identified in the responses to Questions 1 and 2 of this comment form is required prior to further consideration of the Draft 2 Version 0 standards.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
002	☐ R ☐ M Number	**Policy 1B, Section 2.5 regarding the "Treatment of Multiple Contingencies" is described in the Policy mark-up as being moved to "Supporting Notes" in the standard. The "Supporting Notes" were not included for review in the standard.**
008	☒ R ☐ M Number	**Comments from draft 1 indicated that requirement 5 should remain until version 1 is composed. While the drafting team agreed with this comment, requirement 5 is still lined out to indicate deletion.**
018	☐ R ☐ M Number	**The last part of the purpose appears to be missing a word or two (…return the transmission system normal conditions during and emergency).**
023	☒ R ☐ M Number 001	**Requirement 1 does not appear to be updated to include “their” as indicated on draft 1 responses.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
030	☐ R ☒ M Number 001	**Revise as follows to correct grammar: "Evidence that the Reliability Authority, Transmission Operator, and Balancing Authority operating personnel have the responsibility and authority to implement real-time actions that ensure the stable and reliable operation of the Bulk Electric System are documented and understood. Documentation shall include:"**
13.0	☐ R ☐ M Number	**The Levels of Non Compliance are not realistic for tags associated with dynamic schedules. The purpose of the tag is to reflect the power exchange that is currently accruing on the power system, but currently it is possible that the tag can get held or delayed which will result in a non compliance.**
013	☐ R ☐ M Number	**The Levels of Noncompliance and reset period are overly stringent for Balancing Authorities with multiple dynamic schedules. As currently written, failure to update a single tag requires performance over a full calendar year without a subsequent violation to achieve full compliance. Suggest reducing the compliance reset period to 3 months.**
013	☐ R ☐ M Number	**The data retention period and reset period do not appear to be aligned. The data retention period is 3 months and the compliance reset period is 1 year. Suggest revising the data retention period and compliance reset period to be equal (i.e., 3 months).**
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
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	☐	8 - Small Electricity End Users
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Group Comments (Complete this page if comments are from a group.)

Group Name: **South Carolina Electric and Gas Company**

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Additional Member Name	Additional Member Organization	Region*	Segment*
Lee Xanthakos	SCE&G	SERC	1
Gene Delk	SCE&G	SERC	1
Charles White	SCE&G	SERC	1
Gene Soult	SCE&G	SERC	5
Sally Wofford	SCE&G	SERC	1
Matt Hammond	SCE&G	SERC	6
Al McMeekin	SCE&G	SERC	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☒ Disagree.

Comments

By introducing RC into Version 0, the drafting team has effectively:

- **Ignored years of development on the functional model**
- **Ignored the guidelines in SAR that enable Version 0**
- **Ignored ANSI standards process rules**
- **Enabled other NERC groups like the ORS and RCWG to make rules that violate antitrust laws.**
- **Ignored state statutes and prescribed requirements that would require organizational restructuring**

Ignored years of development on the functional model:
By including responsibilities for Reliability Coordinators in Version 0, the drafting team has effectively ignored years of Functional Model development. The CACTF, and subsequent other teams, worked diligently over several years in determining that an entity able to perform the function outlined for a Reliability Authority should be the highest level of authority on the power system. Instead of accepting this conclusion which was reached through a collaborative process, the Version 0 drafting team has take it upon itself to effectively change the structure outlined by the Functional Model and has introduced an unnecessary level of authority and responsibility.

Ignored the guidelines in SAR that enable Version 0:
The drafting team has ignored the instructions it was given in the enabling SAR that specifically states that designations in Version 0 should be limited to those defined in the Functional Model. By

including requirements for Reliability Coordinators the drafting team has ignored this requirement and taken it upon itself to include entities that are essentially undefined by the rules set forth.

The drafting team actually realizes its limitations in other sections of Draft 2, but has chosen to ignore them when it come the Reliability Authorities and Reliability Coordinators. In particular, for its response to the comment from TransEnergie on Draft 1 Standard 32 the drafting team commented that the term System Operator could not be used because it is not defined in the Functional Model. The drafting team then ignores its own comment and uses the term Reliability Coordinator which also is not defined in the Functional Model.

Ignored ANSI standards process rules:
ANSI rules define a very clear process for standard development. As stated before, drafting teams are limited to requirements outlined in their enabling SARs. By ignoring these rules, and deviating from the Version 0 SAR, the drafting team sets a precedence that allows other drafting teams to do the same. Taken to the extreme, this precedent would allow drafting teams to ignore any and all part of the ANSI process and write standards in any way they see fit. The whole purpose of the ANSI process is collaboration, and by taking this route, the drafting team has elected to ignore majority comments and has instead included Reliability Coordinators as mean of appeasing a politically minded minority.

Draft 2 enables other NERC groups to make inappropriate statements and requirements:
Since Version 0 Draft 2 was published, a number of NERC groups have made requirements defining how electric industry participants can register. Specifically, the ORS and RCWG made and approved the following motions: "1) where Reliability Coordinators are referenced in today's operating policies, they be translated to Reliability Authorities in Version 0, and 2) for the initial registration only those organizations that are RCs today shall register as RAs." Limiting a modern day Control Area that is able to perform the functions defined in the Functional Model from becoming a Reliability Authority because it was not a Reliability Coordinator in a previous life is absolutely criminal. Along those same lines, mandating that a modern day Reliability Coordinator must register as a future Reliability Authority is also illegal. What if the Reliability Coordinator does not want those responsibilities and associated liabilities– how can NERC force them to become Reliability Authority and assume them? On the other hand, what if a Control Area is not only willing to assume the responsibilities, but also mandated to do so by its state laws and regulators? How can NERC force then to not register as Reliability Authorities if they meet the requirements defined in the Functional Model, and are ready, willing and able to do so? It is clear that by taking the approach defined by the language in Draft 2 NERC is ignoring individual company capabilities and strong arming industry participants into an ill advised framework.

Ignored state statutes and prescribed requirements that would require organizational restructuring:
By including responsibilities for Reliability Coordinators in Draft 2 of Version 0 when the majority of industry comments were in favor of Reliability Authority language in Draft 1, NERC and the drafting team are single handedly attempting to dictate organizational structure of many vertically integrated utilities. In many cases, these utilities are restricted by state statutes that make it illegal for them to transfer controls and authorities as described in Draft 2 of the standards. Furthermore, by requiring that only previously registered Reliability Coordinator are able to register as Reliability Coordinators or Reliability Authorities NERC is making the matter more difficult.

Due to the issued described above, NERC has made it impossible for SCE&G to vote in the affirmative on the current Draft of the Version 0 standards. SCE&G believes that a more

appropriate approach would be for the drafting team to return Reliability Authorities as the highest level of authority in Version 0 and to eliminate all references to requirements that only current Reliability Coordinators can register as Reliability Authorities. NERC should allow both Control Areas and Reliability Coordinators to register based on their company and regional requirements and only after an audit process determine is the entities meets the requirements of performing Reliability Authority functions. Entities not passing their audits would have to either submit and follow mitigation plans or reregister as lover level authorities.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Neither scenario is acceptable under Draft 2. If the drafting team returns to the Reliability Authority language on Draft 1 the above question becomes a non-issue

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Correcting deficiencies (or perceived deficiencies) is outside of the drafting team's scope. The SAR states that the drafting team is to translate rather than improve. Improvements should be made at a later time through the standards process..

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Phase III and IV standards should be dropped. They have many issues. The old NERC PSS, who created these standards, had already made decisions to drop many of the Phase IV standards, however, the opportunity never came because of transition to the SAR process.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

ATC and CBM portions of Standard 054 address business practices and should be deleted from Version 0. TTC and TRM portions address reliability issues and should be retained in Version 0.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
Standard 055 address business practices (CBM) and all sections should be deleted from Version 0.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Standard 056 addresses a reliability issue (TRM) and should remain a part of Version 0.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☒ Yes.

☐ No.

Comments

References to Distribution Provider compliance within Standard 060 are not included in the draft document provided for review. While this Standard is potentially applicable to and associated with specific generation connections, protection schemes, and end-use applications, all references to Distribution Provider compliance within these Standards should be carefully worded to specify Generation/Transmission/ Distribution interface issues so as to avoid attempts to impose or misinterpret bulk electric system reliability standards on distribution system reliability practices. In general, this appears to have already been done (for example, Standard 063.2 Analysis and Reporting of Transmission Protection System, Misoperations, states: The Transmission Owner, Generator Owner, Distribution Provider that owns transmission protection system(s) shall analyze all protection system misoperations and shall take corrective actions to avoid future misoperations. This example attempts to clearly require Distribution Providers that own transmission protection schemes to address misoperations of these transmission schemes and is not intended impose these requirements for other distribution-specific protection schemes.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
"Unaffiliated Third Party"	☐ Delete ☒ Add ☐ Modify	**Not clear if this was intended to be NERC or some other organization(s).**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
If a change is made, it should be done now and not later.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

We would not vote to approve until inconsistencies between the Standards and the SAR are rectified. Specifically, we will not approve until the term Reliability Coordinator is removed from the standards. Also we will not approve until it is clear that any entity capable (to be proven through audit) of performing the responsibilities defined for Reliability Authorities can register as Reliability Authorities regardless of their previous role in NERC.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

As was stated in our response to question 10, we would not vote to approve until the standards recognize the fact that current day Control Areas are able to register as Reliability Authorities as long as they are able to perform the requirements defined for a Reliability Authority in the functional model.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

1. The drafting team must follow the ANSI approved standards process. That means that the drafting team must adhere to the requirements outlined by the SAR and not make changes on its own accord. Doing otherwise not only negates the validity of the ANSI process, but also opens a window for future drafting teams to veer from their SARs.

2. In some cases NERC was changed to "Unaffiliated Third Party" and in other cases reference to NERC was retained. What is the intent "Unaffiliated Third Party"? Why was "Unaffiliated Third Party" not substitited for NERC in all cases?

3. All the standards need to be reviewed for consistency (e.g., Load Serving Entity versus Load-serving Entity), punctuation, and proper grammar.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.1	☒ R ☐ M Number 1.0	**Need to define "valid assessment" or state that if the listed items are included then the assessment is valid.** **This also applies to 51.2, R-1; 51.3, R-1; and 51.4, R-1.**
51.1	☐ R ☒ M Number 1.0	**Revise the following "provided assessments and corrective plans" to read "performed assessments and developed corrective plans ." M1-1 refers to the requirements R1-1 and R1-2. These requirements are for performing assessments and developing corrective plans. The providing requirements is R1-3. Therefore, M1-1 should say performed assessments and developed corrective plans, not provided them.** **This also applies to 51.2, M-1; and 51.3, M-1.**
51.1	☐ R ☒ M Number 2.0	**Delete - "None Identified"**
51.2	☒ R ☐ M Number 2.0	**Change the word "their" to "its" in the first sentence in item a).**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.4	☒ R ☐ M Number 1.0	**Remove the last sentence "The controlled interruption of customer demand, the planned removal of generators, or the curtailment of firm (non-recallable reserved) power transfers maybe necessary to meet this standard." This sentence is not correct since this measurement has assestment requirement only, and no corrective actions required.**
51.4	☐ R ☒ M Number 1.0	**Revise the following "shall provide assessments" to read "shall provide evidence that it performed assessments." M4-1 refers to the requirements R4-1. This requirement is for performing assessments. The providing requirement is R4-2. Therefore, M4-1 should say provide evidence that it performed assessments, not provided them.**
51.4	☐ R ☒ M Number 2.0	**In M4-2, change the reference "051.4 R4-1" to "051.4 R4-2."**
52.1	☒ R ☐ M Number 2.0	**Delete the second "shall" in the sentence.**
53.1	☐ R ☒ M Number 2.0	**Delete the phrase "for generation facilities, transmission facilities, and end-user facilities" from the measurement. R1-1 requires that facility connection requirements cover generation facilities, transmission facilities, and end-user facilities. R1-2 requires that the facility connection requirements contain the 16 items given. Since M1-2 refers to the requirements in R1-2, there is no need for the words "generation facilities, transmission facilities, and end-user facilities" in M1-2.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
53.2	☒ R ☐ M Number 1.0	**Revise the following to read "R 2-1. The Generator Owner, Transmission Owner, Distribution Provider, or Load Serving Entity seeking to integrate generation facilities, transmission facilities, and electricity end-user facilities shall coordinate and cooperate with the Transmission owner with which they seek to connect, and other appropriate entities, on their respective assessments." This change is needed to identify who should be coordinated with.**
53.2	☒ R ☐ M Number 1.0	**The phrase "evaluate the reliability impact of the new facilities and their connections on the interconnected transmission systems" is used redundantly in the introductory sentence and under item a).** **Delete the first occurrence.**
53.2	☒ R ☐ M Number 2.0	**Delete the word "council."**
54.0	☐ R ☐ M Number	**Purpose: The last sentence is redundant, delete it.**
54.1	☒ R ☐ M Number 1.0	**d). Reinsert the word "how" such that it reads "A description of how incomplete…"** **f). Change "Indication that treatment" to "An indication of the treatment..."** **g). Insert "A" at the beginning of the sentence.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
55.3	☒ R ☐ M Number 2.0	**Revise "their Capacity Benefit Margin use…" to "their Use of Capacity Benefit Margin…" Change all other occurrences in Levels of Non-Compliance 1 and 4.**
55.4	☒ R ☐ M Number 1.0	**Delete "Capacity Benefit Margin use" at the end of the last sentence.**
56.0	☐ R ☐ M Number	**Purpose: In the first sentence change the term "Transmission System Providers and Transmission Owners…" to "Transmission Service Providers..." changing "System" to "Service" and deleting the reference to Transmission Owners.** **The Functional Model implies that TRM is determined solely by Transmission Service Providers.**
58.1	☐ R ☐ M Number	**Timeframe: Change "058.2-R2-M1" to "058.2-R2-1".**
58.2	☒ R ☐ M Number 1.0	**Add the following after the first sentence: "The procedures shall include the identification of the entities responsible for the reporting of the data (referred to in 058.1 as 'Responsible Entity')".**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.3	☐ R ☐ M Number	**Change all references throughout the standard to "Reliability Standard 058.4-R4" and "Reliability Standard 058-R4" to "Reliability Standard 058.4-R4-1."**
58.4	☒ R ☐ M Number 1.0	**Add the following after the first sentence: "The procedures shall include the identification of the entities responsible for the reporting of the data (referred to in 058.3 as 'Responsible Entity')".**
58.4	☒ R ☐ M Number 1.0	**In item d), change the reference to "Reliability Standard 058.1-R1" to "Reliability Standard 058.1-R1-1."**
58.6	☒ R ☐ M Number 2.0	**To be consistent with 058.5 R5-1, combine 058.6 R6-2 with R6-1.**
60.0	☐ R ☐ M Number	**In both 060.1 and 060.2, to be consistent use either "methodology(ies)" or "methodology(s)." Both are now used at various places throughout the standards.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
60.1	☐ R ☐ M Number	**Levels of Non-compliance: Change references to "elements (1-5)" to "elements (a-e)."**
61.5	☐ R ☒ M Number 1.0	**The measurement does not appear to be addressing the focus of 061.5. Change the term "actual and forecast demand data was" to read "nonmember entity demand data and forecast uncertainties were."**
61.5	☐ R ☐ M Number	**Levels of Non-compliance: in Level 1 change "061.5-R51- items a) or 061.5-R51- b)" to read "061.5-R5-1 item a or b." In Level 2 change "061.5-R51- items a) and 061.5-R51-b)" to read "061.5-R5-1 items a and b."**
61.6	☒ R ☐ M Number 1.0	**Change "Regions" to "Regional Reliability Organizations."**
61.6	☐ R ☐ M Number	**Levels of Non-compliance, Level 4: While it is a direct transulation, the term "controlled demand-side management data" should be changed to "interruptible demands and direct control load management" to be consistent with the rest of the standard.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
61.7	☒ R ☐ M Number 1.0	**Change "system operators and security center coordinators" to "Reliability Authority(ies) and Transmission Operator(s)" to be consistent with 061.7 M7-1.**
61.8	☐ R ☒ M Number 1.0	**M8-1 is basically a repeat of R8-1. To be consistent with similar measurements, revise it to read: "The Load Serving Entity's, Planning Authority's and Resource Planner's forecasts shall each be clearly documented per Reliability Standard 061.8-R8-1."**
61.8	☐ R ☒ M Number 2.0	**M8-2 is basically a repeat of R8-2. To be consistent with similar measurements, revise it to read: "The Load Serving Entity's, Planning Authority's and Resource Planner's forecasts shall each include information per Reliability Standard 061.8-R8-2."**
63.2	☒ R ☐ M Number 1.0	**Add the word "and" between "Generator Owner" and "Distribution Provider."** **This also applies to R2-2.**
63.3	☒ R ☐ M Number 2.0	**Include Distribution Providers that owns transmission protection system(s). Since they are included in 62.2 they should also be included in 63.3.** **This change should also be applied to measures M3-1 and M3-2.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
67.0	☐ R ☐ M Number	**General Comments:** **1. There needs to be consistency in the use of either "Under Frequency" or "Underfrequency." The current compliance templates use "Underfrequency."**
67.1	☒ R ☐ M Number 1.0	**Un-capitalize the word "Program" in the first sentence and in item c.**
67.1	☐ R ☒ M Number 1.0	**Un-capitalize the words "Program" and "Current."**
67.2	☐ R ☐ M Number	**Levels of Non-compliance, Level-1: change the reference to "Reliability Standard 067.1-R1" to read "Reliability Standard 067.1-R1-1."**
67.4	☐ R ☐ M Number	**General Comment: Since load serving entities are not included in Standards 067.2 and 067.3, they should also not appear in 067.4.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
67.4	☒ R ☐ M Number 1.0	**Insert a comma between the words "program" and "shall," such that it reads "…required by the Regional Reliability Organization to have an underfrequency load shedding program, shall analyze…"**
67.4	☐ R ☒ M Number 1.0	**Change M4-1 to read: "The Transmission Owner's, Transmission Operator's, and Distribution Provider's (required by the Regional Reliability Organization to have an underfrequency load shedding program) analysis and documentation of underfrequency load shedding program performance following an underfrequency event shall include all elements identified in Reliability Standard 067.4-R4-1."This change is needed to fix the incorrect use of the apostrophe in the phrase "shedding program's analysis".**
68.0	☐ R ☐ M Number	**Purpose: Revise the end of the first sentence from "…requiring end users of electricity on the bulk electric system to drop loads" to read "requiring the interruption of electrical supply to end users."**
68.0	☐ R ☐ M Number	**General Comments:** **1. There needs to be consistency in the use of either "Under Voltage" or "Undervoltage." The original compliance templates used "Undervoltage."** **2. Since load serving entities are not included in Standard 067, they should also not appear in Standard 068.**
68.3	☐ R ☒ M Number 1.0	**Revise the phrase "shall include" to read "shall have an assessment which includes."**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
68.3	☐ R ☐ M Number	**Levels of Non-compliance, Level 4: revise the reference to "Reliability Standard 068.3-R3" to read "Reliability Standard 068.3-R3-1."**
69.3	☒ R ☐ M Number 2.0	**Change the term "Reliability Authorities" to read "Regional Reliability Organizations."**
69.3	☐ R ☐ M Number	**Levels of Non-compliance: Levels 1 and 2 use the phrase "The summary (or detailed) Regional Reliability Organization Special Protection System assessment," while Levels 3 and 4 use "The Regional Reliability Organization's summary (or detailed) Regional Reliability Organization Special Protection System assessment." This needs to be made consistent.**
70.1	☒ R ☐ M Number 1.0	**The Testing Frequency requirement listed in R1-1c should clarify that generator owners who own less than three blackstart units do not have to retest the same unit consecutively (every year) as long as the generator owner tests its blackstart unit(s) every three years.**
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**John Blazekovich**	
Organization:	**Exelon Corporation**	
Telephone:	**630-691-4777**	
Email:	**john.blazekovich@exeloncorp.com**	
NERC Region		**Registered Ballot Body Segment**
☒ ERCOT ☐ ECAR ☐ FRCC ☒ MAAC ☒ MAIN ☐ MAPP ☒ NPCC ☒ SERC ☒ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☒	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☒	5 - Electric Generators
	☒	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1-4)

B – Planning Standard (Questions 5 -

C – General Issues Applying to Operating and Planning (Questions

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☒ Disagree.

Comments
An attempt to meet the concerns of a few will result in the continuation of the ambiguity that dictated the need to transform existing policies into enforceable standards.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Emphasis should be on the submittal of SARs addressing NERC blackout recommendations to ensure industry momentum on causal factors.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

The calculation of TTC, ATC or Available Flowgate Capability (AFC) all incorporate the Transmission Owners reliability criteria (i.e their Planning Criteria) in determining what transmission capacity may be available for commercial purposes. These are reliability values that are used for commercial purposes and ultimately contribute to the actual loadings seen on the transmission system. There are no business practices addressed here but rather, the reliability practices of the Transmission Owner. Therefore this standard needs to remain under NERC.

The standard also covers reviews of the calculation methodologies and an open process to input comments or concerns about the calculation methodologies. Since the methodologies deal with reliability practices, the reviews and issues raised do not encompass "business practices".

The business practice associated with TTC, ATC and AFC is the sale of the available transmission capacity that is determined via these calculations. This standard does not address the sale of transmission capacity and therefore does not belong under NAESB. Exelon Corporation is willing to consider the business practices associated with the sale of transmission services in future versions of this standard.

The current wording in the standard exempts entities from this standard that are not required to post ATC. The standard needs to include those entities that are not required to post ATC, but post either a TTC or AFC as these are reliability values that are used to determine ATC.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
Sections 055.3 and 055.4 deal with the use of CBM and therefore are a business practice .

The remaining section of the standard deal with the calculation of CBM and the review of the calculations. Since CBM is a reliability value the sections dealing with its calculation need to remain under the NERC.

To understand why CBM is a reliability value one must clearly understand how it came into existence. Earlier in the development of this industry, there were predominately local vertically integrated electric utilities. Each utility built sufficient generation to serve its own load responsibility. Transmission interconnections with neighboring utilities were typically established as an economic decision to build transmission instead of generation based on the generation reliability criteria the utility planned for (i.e tie to neighbor to meet generation reliability criteria). This reason is the origin of the CBM concept. Transmission interconnections provide each interconnected system with access to their neighbors so that in the event of an extreme generation outage within a utility, that temporarily generation deficient utility could have access to emergency generation resources from their interconnected neighbors. CBM is the quantification of this use of the transmission system. Therefore, CBM is an emergency use transmission quantity and only exists on the importing system for use only during periods of an emergency generation deficiency when firm transmission service is not available. Just as transmission capacity is preserved for the transmission contingencies a utility planned for, transmission capacity is also preserved for the generation contingencies that are planned for. In either case, the utility customers paid for the transmission capacity that was installed to maintain the reliability level that is planned for, via their rates for service.

The standard recognizes CBM as a reliability value by requiring that the method used by each Regional Organization member to determine its generation reliability requirements as the basis for Capacity Benefit Margin shall be consistent with its generation planning criteria.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
TRM is a reliability margin that is used in ATC calculations to account for uncertanities that transmission owners account for in their planning studies. This is echoed in the standard itself, which states A Transmission Reliability Margin value is considered consistent with published planning criteria if the same components that comprise the Transmission Reliability Margin are also addressed in the planning criteria. TRM is a reliability margin not a business practice and therefore belongs under the NERC.

In the requirement section R2-1 item C has the wording, Require review of the consistency of the Transmission Service Provider's Transmission Reliability Margin components with it published planning criteria. This assumes that the Transmission Service Provider has a planning criteria which may not be true. The components of TRM may be based on the Transmission Owner's planning criteria. A suggested wording is Require review of the consistency of the Transmission Service Provider's Transmission Reliability Margin components with the published planning criteria they are based upon.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Blackstart Capability Plan	☐ Delete ☐ Add ☒ Modify	**This appears to target generating units/station that have the ability to re-start with no sources of off site power. It should also cover gen units/stations**
Blackstart Capability Plan pt.2	☐ Delete ☐ Add ☒ Modify	**that are not blackstart capable i.e. safe shutdown/configure the station for orderly re-start after off site power source is restored.**
Disturbance Recovery Criterion	☐ Delete ☐ Add ☒ Modify	**ref. Policy 1.B 2.2.1**
Disturbance Recovery Period	☐ Delete ☐ Add ☒ Modify	**ref. Policy 1.B 2.2.2**
Entities Responsible for the Reliability of the Interconnected Tra	☒ Delete ☐ Add ☐ Modify	**Define specific functions in Standard 58.2, 58.3 58.4 then delete this term from the Standards.**
Network Integration Transmission Service	☐ Delete ☐ Add ☒ Modify	**spelling error**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

The calculation of TTC, TRM, CBM, ATC, or Available Flowgate Capability (AFC) all incorporate the Transmission Owners reliability criteria (i.e their Planning Criteria) in determining what transmission capacity may be available for commercial purposes. These are reliability values that are used for commercial purposes and ultimately contribute to the actual loadings seen on the transmission system.

The business practice associated with TTC, TRM, CBM, ATC and AFC is the sale of the available transmission capacity that is determined via these calculations. As such Exelon Corporation does not feel that is appropriate to move these standards to business practices at this time.

Exelon Corporation is willing to consider the migration of business practices associated with the sale of transmission services in future versions of this standard.

Exelon Corporation would vote against the approval of the Version 0 Standards if Version 0 Standards included the migration of TTC, TRM, CBM, ATC and AFC to business practices

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
The adoption of ATC, TRM and certain portions of CBM as business practices.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Charles P. Matassa, Kenneth W. Braerman**	
Organization:	**Baltimore Gas and Electric Company**	
Telephone:	**410-597-6364**	
Email:	**charles.p.matassa@bge.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☒ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

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R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

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Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

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- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

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- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

BGE agrees with the dropping of the listed standards in order to move the process to closure thereby establishing the Version 0 standards. However, BGE believes that the deleted standards need to be reviewed. The reinstatement of those standards that are deemed to be needed should be implemented on an expedited schedule. This is especially true for those standards related to issues associated with the 8/14/2003 blackout.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

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054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Although the amount of Transmission Capability available for firm reservation on a system does have an effects on markets, the calculation of ATC is designed to preserve the security of the system overall and the adequacy of supply to native load customers. The goal of the calculation is the determination of the maximum amount of transmission capability that can be made available for firm reservation without impacting reliability. As such, the calculation of ATC should not be subject to business practices and all of Standard 054 should remain as a reliability standard.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Capacity Benefit Margin is used to help ensure the adequacy of supply to native load customers in a region. To a large degree the choice of a CBM level represents a trade-off between reliance on generation reserves outside of a region and higher capacity requirements within a region. However, because the level of CBM can have an effect on adequacy, all of Standard 055 should remain a reliability standard.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
BGE views TRM as the operating margin designed to preserve system security and therefore no part of Standard 056 should become a NAESB business practice.

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
CBM	☐ Delete ☒ Add ☐ Modify	**Term used and not defined**
TRM	☐ Delete ☒ Add ☐ Modify	**Term used and not defined**
ATC	☐ Delete ☒ Add ☐ Modify	**Term used and not defined**
TTC	☐ Delete ☒ Add ☐ Modify	**Term used and not defined**
Disturbance Analysis Working Group	☐ Delete ☐ Add ☒ Modify	**Inadequate definition**
Disturbance Control Standard	☐ Delete ☐ Add ☐ Modify	**Inadequate definition**
Control Performance Standard	☐ Delete ☐ Add ☐ Modify	**Inadequate definition**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☒ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
No

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☒ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☒	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **Southern Company Generation & Energy Marketing (SCGEM)**

Lead Contact: Roman Carter

Contact Organization: Southern Company

Contact Segment: 6

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Joel Dison	SCGEM	SERC	6
Tony Reed	SCGEM	SERC	6
Lucius Burris	SCGEM	SERC	6
Lloyd Barnes	SCGEM	SERC	6
Roman Carter	SCGEM	SERC	6
Roger Green	Southern Generation	SERC	5
Clifford Shepard	SCGEM	SERC	6
Tom Higgins	Southern Generation	SERC	5
Terry Crawley	Southern Nuclear	SERC	5

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

SCGEM agrees with this decision and the Version 0 SDT's highest priority is to convert existing NERC Policy into Standards using active statements and holding entities accountable for performing given functions.

Putting the Standards into Functional Model language is important but should not take precedent over Policy's interpretation.

If both RA and RC remain in V0, then we believe that the RA's would be underneath the responsibility of the RC. If possible, put a hold on the RA registration until better definitions exist for their responsibility.

Therefore, SCGEM recommends retaining the RC in the V-0 without the RA.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Introducing both the RC and the RA into the Version 0 Standard will bring confusion to the Industry as to who has utimate authority. The majority of the RA functions are "wide area" responsibilities which are associated with the current RC duties under current Policy. Most, if not all, local RA responsibilities can be performed by the Transmission Operator.

If both RA and RC remain in V0, then we believe that the RA's would be underneath the responsibility of the RC. If possible, put a hold on the RA registration until better definitions exist for their responsibility.

Therefore, SCGEM will vote against the RA being in Version 0. Also, the RC should continue its present responsibilities currently contained within Policy 9.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Provides more flexibility for small transactions and improves reliability for larger (>250mw) transactions.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

Furthurmore, SCGEM highly recommends that the entire NERC Policy be included in the proposed guide. If you "throw away" the supporting documentation of current Policy, then you have nothing to refer back to in understanding how we got to where the Policies have brought us to today.

They are NOT to be used for enforcement and is an attachment for reference only.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

NERC should never Standardize anything that has not been field tested nor that Industry has not agreed to fully.

SCGEM fully supports leaving out the Phase III Planning Standards in Version 0 which have not been field tested or accepted by Industry. Phase IV should not be implemented at all in Version 0.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

The ATC portions of Standard 054 address business practices and should be deleted from Version 0. The TTC portions address reliability issues and should be retained in Version 0

Not sure what SCGEM should consider as business on 054

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments
Standard 055 addresses business practices and should be deleted from Version 0.

What does SCGEM want to do?

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Standard 056 addresses a reliability issue and should remain a part of Version 0.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments
Current Policy does not include Distribution Provider and the V-0 was instructed to not change current Policy. Therefore, SCGEM does not believe it should be added in V-0 Standard.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Transmission Service Provider	☐ Delete ☐ Add ☒ Modify	**The definition says the TSP owns, operates, or controls the transmission facilities. This is not always an accurate statement.**
Market Operator	☐ Delete ☒ Add ☐ Modify	**Did not see this in the Glossary**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

If the Version 0 draft presented to the Ballot Pool for approval represents the viewpoints presented here by SCGEM, we would be supportive.

Additionally, if the Phase IV and Phase III Standards which have been removed thus far somehow get put back into Version 0, SCGEM will vote no on this Standard.

Question 11:

Are there any "show stoppers" in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
If the V-0 team removes the RC and reverts back to the RA only.

Additionally, if the Phase IV and Phase III Standards which have been removed thus far somehow get put back into Version 0, SCGEM will vote no on this Standard.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
13.0	☒ R ☐ M Number 1.0	**Standard 013 does not address TLR's as current Policy does. Therefore an additional requirement should be included to adrress it:** **R1.1.3 [Policy 3D 2.1] When a system condition necessitates using a Transmission Loading Relief (TLR) procedure to curtail Interchange Transactions to ensure reliable operation of the electrical system, the Sink Balancing Authority (Sink BA) shall coordinate the modifications to the appropriate tags.**
13.0	☒ R ☐ M Number 1.0	**Standard 013 does not address Local or Regional system conditions. Therefore an additional requirement should be included to address it:** **R1.1.4 [Policy 3D 2.2] When a local or regional system condition or a transmission line overload condition necessitates curtailing Interchange Transactions, the Transmission Service Provider (TSP) and the affected Balancing Authority (BA) shall implement the curtailment and coordinate the modification to the appropriate tags.**
7.0	☒ R ☐ M Number 3.0	**It is not practical to say the RA and the TOP operate, when practical, to protect against instability, separation, or cascading outages. Recommend removing "when practical" because when is it ever practical to allow cascading outages.**
51.1	☒ R ☐ M Number 1.1	**It should be made clear that the requirement to deliver generator unit output to meet projected customer demand in R1-1 should be for those generator units with firm deliverability, even to native load customers. Without designation of the capacity and granting of firm service, it should not be a requirement to build transmission for speculative sources of native load generation.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
5.0	☒ R ☐ M Number 1.1	**Original Policy stated that all generation, load, and transmission operating in an interconnection must be within a BA. The V-0 Std. states that the Gen. Operator is now responsible for making sure they are inside a BA. The RC or BA should be held responsible for making sure all generation is covered under a BA.**
17.0	☒ R ☐ M Number 1.0	**Before the Generator Operator is held liable for being familiar with the protection schemes in its area, the applicable protection schemes should be well explained to the GO.**
17.0	☒ R ☐ M Number 2.1	**It may not be perfectly clear to the Generator Operator if a protective relay or equipment failure will reduce "system" reliability. The Transmission Operator and Reliability Coordinator need to define the scope of failures to the Generator Operator that will impact "system" reliability.**
17.0	☒ R ☐ M Number 5.1	**This requirement places the burden on the GO to report changes in transmission conditions to the TOP and host BA which could result in changes to their protection systems. The change in transmission conditions should be reported by the TOP.**
22.0	☒ R ☐ M Number 3.1	**Current Policy requires the Operating Authorities to make the reports to either NERC and possibly to DOE. Is this appropriately applied to the Generator Operator or is it more appropriate for the TOP or BA to report? Does this include Nuclear Plants who already have reporting requirements specified by nuclear regulations?**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.2	☒ R ☐ M Number 1.0	**Add the following after the first sentence: " The procedures shall include the identification of the entities responsible for the reporting of the data (referrred to in 058.1 as 'Responsible Entity')"**
0.0	☒ R ☐ M Number	**Does the term System Operator refer to Reliability Authority or does it apply to everyone, i.e., TOP, GO, BA, RA? What was NERC's original intent? There are new requirements on the Generator Operators which were not interpreted to apply to them before Version 0.**
9.0	☒ R ☐ M Number R7.1	**This responsibility should be assigned to the Transmission Operator and Reliability Coordinator. The Generator Operator relies upon the Transmission Operator and Reliability Coordinator to determine appropriate levels of excitation to maintain stability. This is then communicated to the G.O. for appropriate adjustments.**
18.0	☒ R ☐ M Number 7.0	**There are times when a Generator Operator must act quickly and may not have time to notify the Transmission Operator. There needs to be an exception here (like that listed in 7C for the RA and TOP) for emergency situations that allows follow up notification by the GO.**
18.0	☒ R ☐ M Number 7.0	**There are two Requirement 7's in Standard 18. The second Requirement 7 should be re-labled Requirement 8.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
10.0	☐ R ☐ M Number	**In Attachment 010-2, the basic title information is listed. However, under the old Appendix 3A4, the real information required is much more detailed and listed under the titles that are currently included in V-0. It is recommended that the V-0 use the more detailed information to be clear what is required.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**E. Nick Henery**	
Organization:	**SMUD**	
Telephone:	**916-804-0203**	
Email:	**nhenery@smud.org**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☒ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
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	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments
This will allow the reliablity responsibility be layered starting at the Balancing Authority Area with the Reliability Authority and expanding to the wide area reliability oversite with the Reliablilty Coordinator.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

It has been pointed out that in some regions the Transmission Operator is really switching and not preforming the complete reliablity functions. Having both TO and RA will cover all regions reliablility responsibility.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Reliability Authority	☐ Delete ☐ Add ☒ Modify	**The present Definition has overlaping authority with the Reliability Coordinator. Both are the highest level of authority, which cannot be.**
Reliability Authority Information System	☐ Delete ☐ Add ☒ Modify	**There should not be a reference in existing policies to a "Reliability Authority" Information System. This information system will apply to BA, RC, TO, RA**
Transmission Service Provider	☐ Delete ☐ Add ☒ Modify	**Transmission Service Provider does not have to own, operate, or control facilities used for transmission. They must administer the tariffs and so-on.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Because NERC will no longer certify Control Areas, much work is needed to assess the impact on issues like RMS agreements, MORC standards and so on

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

The relationship between the RC and RA is a very important issue. Various Reliability Regions have different contractual arrangements to insure that all of the reliability requirements are covered by the different functions described in the functional mode. However, each region seems to be very unique in the way they spread out these responsibilities. The present Functional Model and Version 0 standards do not allow enough flexibility for each of the Reliablity Regions to customize the different reliabilty requirements through the various model functions. In otherwords the Model and Version 0 can be interrupted as a "ONE SHOE FITS ALL."

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
16.0	☒ R ☐ M Number 1.1	**The Reliablity Coordinator needs to be included in the chain so the Area Wide assessments can be made along with the BA Wide assessments. Could not find any reference to this subject in Standards 33 through 40.**
7.0	☒ R ☐ M Number 5.0	**The Reliablity Coordinator needs to be included in the chain so the Area Wide assessments can be made along with the BA Wide assessments. Could not find any reference to this subject in Standards 33 through 40.**
14.0	☒ R ☐ M Number 1.2	**The Reliablity Coordinator needs to be included in the chain so the Area Wide assessments can be made along with the BA Wide assessments. Could not find any reference to this subject in Standards 33 through 40.**
18.0	☒ R ☐ M Number 1&2	**The Reliablity Coordinator needs to be included in the chain so the Area Wide assessments can be made along with the BA Wide assessments. This may be covered in Standard 33.**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Robert V. Snow, P.E.**	
Organization:	**Robert Snow**	
Telephone:	**973 763 0832**	
Email:	**FamilySnow@aol.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☒ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☒	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

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☒ Agree.

☐ Disagree.

Comments
This is a short term fix until NERC cleans up the Functional Model and makes it clear and applicable. Add a statement in the applicable sections that the intent is to have the Reliability Coordinators perform the functions when the Functional Model is corrected.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
This is another example of the weakness of the present application of the functional model.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

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R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments
The SAR stated that this would be a translation and should remain consistent with the SAR.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

The guides may be incluided in a separate document or included as part of the standard if reach the level of "good utility practice". Compliance with guides would be difficult to measure.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

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- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

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On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☒ Do not agree with dropping these planning standards from Version 0.

Comments

I agree with keeping all of the sections with the exception of section 62 on system modeling and section 71 on Automatic Restoration of Load.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All of Standard 054.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All of Standard 055.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☒ Yes.

☐ No.

Comments

Any entity that ownes equipment that is part of the interconnected network and is generally 100 kV or higher, should be required to provide consistent facility ratings. The standard should state as many in the functional model would own such facilities and include any other entity.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Critical Line	☐ Delete ☒ Add ☐ Modify	**Transmission lines which cause the loss of equal to or greater than 300 MW of native load or firm transactions.**
Transmission System	☐ Delete ☒ Add ☐ Modify	**Equipment and facilities that are interconnected to form an interconnected network and either included in a FERC accepted tariff or are rated 100 kV or higher.**
Actual Demands	☐ Delete ☒ Add ☐ Modify	**The actual hourly demand of the native load within a region and the average weather data over that hour.**
Forecast Demand	☐ Delete ☐ Add ☐ Modify	**The hourly demand that is expected based on normalized weather conditions.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
This would only result in confusion.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

While this was intended to be a translation of the existing policies, it is less crisp and allows more judgement than the original policies.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

The original policies did not use the Functional Model. As such, the requirements were on the owners of the systems. They were required to identify any violations of the criteria and the analysis was verified by work done by the regions. When violations were identified, it was in the owners interest to remedy the violation or to be taken to task by the applicable regulators, their customers, or their stockholders. The present translation requires studies of the systems but not action by the owners.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.1	☒ R ☐ M Number	**Return to the requirement for multiple time frame studies without exception. If the studies are not conducted, one will never really know if ther is a marginal condition.**
51.2	☒ R ☐ M Number	**Require that all contingencies be studied and then determine which are severs. Most of the August 14 outages by themselves would not have been considered severe.**
51.2	☒ R ☐ M Number	**Return to the requirement for multiple time frame studies without exception. If the studies are not conducted, one will never really know if ther is a marginal condition.**
51.2	☒ R ☐ M Number	**Perform and evaluate the performance over a level of system demands with a variety of generation dispatches.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.3	☒ R ☐ M Number	**If a controlled interruption of customer demand or the planned removal of generators, or the curtailment of firm power transfers is necessary, the locations, amounts and expected duration of the outages will be clearly identified in the report so that the results may be duplicated by a third party. (I do not believe this is an expansion because it has always been considered that the work could be duplicated by another professional.)**
51.3	☒ R ☐ M Number	**Return to the requirement for multiple time frame studies without exception. If the studies are not conducted, one will never really know if ther is a marginal condition.**
51.4	☒ R ☐ M Number	**If a controlled interruption of customer demand or the planned removal of generators, or the curtailment of firm power transfers is necessary, the locations, amounts and expected duration of the outages will be clearly identified in the report so that the results may be duplicated by a third party. (I do not believe this is an expansion because it has always been considered that the work could be duplicated by another professional.)**
53.2	☒ R ☐ M Number -21.0	**Add "transmission owner" between individual and system planning criteria.**
55.1	☒ R ☐ M Number	**It is only logical that CBM be coordinated between regions**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
61.0	☒ R ☐ M Number	**All Actual and Forecast Demands must include the respective weather data to be useful. Any entity responsible for reliability has included weather data, such as THI, woth the actual and forecast data.**
61.2	☒ R ☐ M Number	**Include this section in the next version as in version 0.**
61.3	☐ R ☐ M Number	**Include this section in the next version as in version 0.**
67.2	☒ R ☐ M Number	**Include the measures in the original standard.**
68.5	☒ R ☐ M Number	**Return this section to the standard. It proved useful after the August blackout.**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Alan Adamson**	
Organization:	**New York State Reliability Council (NYSRC)**	
Telephone:	**518-355-1937**	
Email:	**aadamson@nycap.rr.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☒	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments
See comments separately filed by NPCC.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
See comments separately filed by NPCC.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments
See comments separately filed by NPCC.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments
See comments separately filed by NPCC.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

The NYSRC agrees that these standards be removed from Version 0. These standards have not gone through the entire field testing-revision process and would be a "show-stopper" if reintroduced. Instead, the Phase III and IV Standards should be developed as Urgent Action Standards as appropriate.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

All references to ATCs should be removed and portions referencing TCCs retained.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
Sections 55.1, 55.2, 55.3, and 55.4 should be removed.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
Remove all of Section 56.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments
Refer to comments separately filed by NPCC.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
No Response	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

The NYSRC would not approve the Version 0 Standards if any of the "show stoppers" listed in Question #11 remain.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

The NYSRC would not approve the Version 0 Standards if any of the following "show stoppers" remain in the next draft:

1. Many of the existing NERC Planning Standards were not fully translated into Draft #2, which would weaken the NERC standards. The NYSRC commented on this concern in our Draft #1 comments. This comment was addressed to a certain extent in Draft #2, but not entirely.

2. The Phase III and IV Planning Standards, removed in Draft #2, must not be reintroduced .

3. The definition of Bulk Electric System in the Glossary is too broad. The definition approved by the NERC BOT in 1995 could be adopted instead. An alternative would be to retain the BES definition as posted and provide a statement saying that the Regions may define what constitutes their BES. Retaining the BES definition as now in the Glossary without such a statement would be a show stopper.

4. ATC/CBM/TRM related Planning Standards contain business issues. They should be forwarded to the NAESB and removed from the Version 0 Standards.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

In our comments on Draft #1 we urged NERC to state that Regions may implement standards that are more stringent than that stated in Version 0. Such a statement was applied in Draft #1 to Table 1 in the transmission planning standards. Not only was our recommendation ignored in Draft #2, but it was completely removed from Table 1. No explanation was made concerning its removal. We continue to strongly urge that our recommendation be implemented in the next draft.

There is a lack of a clear and consistent compliance process in Draft #2. The levels of non-compliance has not be translated correctly in some standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

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Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Joanne K. Borrell**	
Organization:	**FirstEnergy Solutions**	
Telephone:	**330-315-6857**	
Email:	**jkborrell@fes.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☐	1 - Transmission Owners
☒ ECAR	☐	2 - RTOs, ISOs, Regional Reliability Councils
☐ FRCC	☒	3 - Load-serving Entities
☐ MAAC	☐	4 - Transmission-dependent Utilities
☐ MAIN	☐	5 - Electric Generators
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☐ WECC		
☐ NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

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Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1-4)

B – Planning Standard (Questions 5 -

C – General Issues Applying to Operating and Planning (Questions

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☒ Disagree.

Comments

Version '0' should emphasize the NERC functional model in its entirety. There should be no recognition given to the current Reliability Coordinator (RC). Entities that have problems incorporating the Reliability Authority (RA) functions should modify their procedures and protocols in a manner that is conducive to the NERC functional model. This model has been approved by the industry, and as such, should be followed in a consistent manner thoughtout the entire interconnection.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Version 0 should retain Transmission Operator and Reliability Authority as stated in draft 2. Reason for this are the same as given in question 1. Transmission Operator and Reliability Authority need to be incorporated into the current standards for consistancy in the migration to Version 1, which will incorporate the full functionality of the functional model.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Alternative A, translate existing policy and correct any deficiency in the future, should be adopted by FE for the following reasons:

1) The Drafting Team has only addressed half of the problem, dynamic scheduling. There is no mention of pseudo ties. In fact, pseudo tie is not defined in the glossary.

2) Alternative B further complicates the ability of one balancing authority providing regulation (Ancillary 3) to another balancing authority or another balancing authority's market. A number of balancing authorities provide regulation (Ancillary 3) from generation external to the balancing authority's area.

3) There are many cases where the current Policies or Standards are either deficient or ambiguous and the drafting teams have not attempted to correct the problem. All of these types of corrections or enhancements should go through the complete SAR process and not be corrected or enhanced on an ad hoc basis in Version 0.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

Guides should not be included in any part of the standard. The standard should be able to stand on its own merits. There should be no need to include guides or references that would help make the standard more clear. If guides are included with the standard, they have the potential to become part of the 'sprit' in which compliance and measurements may apply. Guides should be only a stand alone document that has no influence on mandatory compliance of standards. Guides should be part of a reference document that is maintained until the full version 1 is implemented.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

As noted in the discussion, the translation process for Version 0 does not allow for modifications, although field testing may have resulted in several comments to the current requirements. Therefore translating a standard with recognized deficiencies, or untested, would be unproductive and development of a tested and potentially modified standard should be postponed to the Version 1 effort.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Although these processes and margins were developed to provide an indication of transmission capacity available for use, they describe calculation considerations and margins intended to protect the reliability of the transmission system.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Although these processes and margins were developed to provide an indication of transmission capacity available for use, they describe calculation considerations and margins intended to protect the reliability of the transmission system.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Although these processes and margins were developed to provide an indication of transmission capacity available for use, they describe calculation considerations and margins intended to protect the reliability of the transmission system.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments

Assuming the wires operated by the Distribution Provider do not respond to transmission network flows in an appreciable manner, it may not be necessary for the Distribution Provider to comply with these standards.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

The numbering scheme developed by the Version 0 drafting team looks appropriate. As long as there is consistency in the 3 letter acronym that is relative to the various functions in the NERC functional model.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☒ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
There are no 'show stoppers' that would prevent us from not voting for version 0

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

The deployment of the functional model as reflected in the Version 0 standards may result in significant uncertainties and ambiguities that will potentially compromise regional reliability. This arises from several perspectives – the registration of entities according to the current Functional Model requires that a unitary designation be ascertained for each function, despite the functions being shared or performed by several entities. For example, the Transmission Operator function in the PJM footprint is shared between the RTO/market operator and the physical asset owning entities. Thus there is no method, other than executing complex interleaved agreements among the real entities on behalf of the shared functions. In addition, the Version 0 standards impose mandatory obligations upon the functional model registered entities, yet do not address the present gaps in the reliability coverage of the standards. These obligations are currently not intended to be addressed until the eventual adoption of the Version 1 and subsequent standards. Thus, recognized limitations and problems present in the current standards are not being remedied in the Version 0 process. This will inevitably render it increasingly ambiguous to align the (uncertain delineation of) functions against the real (and often complex relationships among) operating entities against the (weakly enhanced and vague) standards and requirements embodied in Version 0.

The fact that supporting materials such as guides and references are necessary demonstrates the need for an expeditious transition to the Version 1 Reliability Standards. The Version 0 Reliability Standards should therefore recognize the need for a quick transition to Version 1 where clear and objective standards can be easily and fairly enforced. At a minimum, the Version 1 Reliability Standards should ensure that: all critical terms are defined clearly, the standards are precise, the standards have objective measures for ascertaining compliance, and the standards are internally consistent with one another. Only with these improvements to the existing and Version 0 standards can the Version 1 Reliability Standards form a strong foundation for a fair and expeditious enforcement program in which all stakeholders can have confidence and benefit from.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Scott Kinney**	
Organization:	**Avista Corp**	
Telephone:	**509-495-4494**	
Email:	**skinney@avistacorp.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☒ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

The Version 0 effort is suppose to focus on transitioning existing policy and standards and not changing them. The recent changes to Operating Policies 5,6, 9 reference Reliability Coordinator duties and responsibilities not the Reliability Authority . Further evaluation and disucssion is required before making this change. This transition should occur in later versions of the standards.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

It will be clearer if the use of Reliability Authority is minimized in the Version 0 standards. Use existing functions as possible and transition to the functional model in later standard versions for the responsibilities of the new functions have been completely defined and approved. Need to clarify the Transmission Operator, Reliability Coordinator and Reliability Authority relationship in future Versions.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments
Avoid policy changes in Version 0

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

Avoid changes and confusion. Need to have clearly defined standard requirements. Guides or best practices should be avoided to eliminate confusion.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Keep the standard requirements clear in Version 0. Avoid any confusion and minimize interpretations.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

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	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Minimize changes and confusion in Version 0 standards. Keep the same numbering scheme that has been used since the first drafts of the Version 0 standards.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Need to keep both the Reliability Coordinator and Reliability Authority functions and minimize the use of Reliability Authority at this point. Keep as many Reliability Authority functions with the Transmission Operator as possible in Version 0.

Question 11:

Are there any "show stoppers" in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Elimination of the Reliability Coordinator function is a show stopper for Avista as well as other Northwest control areas. Avista plans to register as an RA. Currently Avista performs some but not all of the RA functions. The remaining functions are performed by the Pacific Northwest Security Coordinator. Avista plans to maintain this functional relationship going forward.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
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Do submit any formatted text or markups in a separate WORD file.

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Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☐	1 - Transmission Owners
☒ ECAR	☐	2 - RTOs, ISOs, Regional Reliability Councils
☐ FRCC	☐	3 - Load-serving Entities
☐ MAAC	☐	4 - Transmission-dependent Utilities
☐ MAIN	☐	5 - Electric Generators
☐ MAPP	☒	6 - Electricity Brokers, Aggregators, and Marketers
☐ NPCC	☐	7 - Large Electricity End Users
☐ SERC	☐	8 - Small Electricity End Users
☐ SPP	☐	9 - Federal, State, Provincial Regulatory or other Government Entities
☐ WECC		
☐ NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1-4)

B – Planning Standard (Questions 5 -

C – General Issues Applying to Operating and Planning (Questions

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☒ Disagree.

Comments

Version '0' should emphasize the NERC functional model in its entirety. There should be no recognition to the current Reliability Coordinator (RC). Entities that have problems incorporating the Reliability Authority ((RC) functions need to modify their procedures and protocol in a manner that is conducive to the NERC functional model. This model has been approved by the industry, and as such, should be followed in a consistent manner thoughtout the entire interconnection.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Version 0 should retain Transmission Operator and Reliability Authority as stated in draft 2. Reason for this are the same as given in question 1. Transmission Operator and Reliability Authority need to be incorporated into the current standards for constancy in the migration to Version 1, which will incorporate the full functionality of the functional model

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Alternative A, translate existing policy and correct any deficiency in the future, should be supported by FE for the following reasons.

1) The Drafting Team has only addressed half of the problem, dynamic scheduling. There is no mention of pseudo ties. In fact, pseudo tie is not defined in the glossary.

2) Alternative B further complicates the ability of one balancing authority providing regulation (Ancillary 3) to another balancing authority or another balancing authority's market. A number of balancing authorities provide regulation (Ancillary 3) from generation external to the balancing authority's area.

3) There are many cases where the current Policies or Standards are either deficient or ambiguous and the drafting teams have not attempted to correct the problem. All of these type corrections or enhancements should go through the complete SAR process and not be corrected or enhanced in Version 0.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

Guides should not be included and any part of the standard. The standard should be able to stand on its own merits. There should be no need to include any guides or references that would help make the standard more clear. Also, if guides are included with the standard, they have the potential to become part of the 'sprit' in which compliance and measurements may apply. All current guides should be part of a reference document that is maintained until the full version 1 is implemented.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

As noted in the discussion, the translation process for Version 0 does not allow for modifications, although field testing may have resulted in several comments to the current requirements. Therefore translating a standard with recognized deficiencies, or untested, would be unproductive and development of a tested and potentially modified standard should be postponed to the Version 1 effort.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Although these process and margins were developed to provide an indication of transmission capacity available for use, they describe calculation considerations and margins intended to protect the reliability of the transmission system.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Although these process and margins were developed to provide an indication of transmission capacity available for use, they describe calculation considerations and margins intended to protect the reliability of the transmission system.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Although these process and margins were developed to provide an indication of transmission capacity available for use, they describe calculation considerations and margins intended to protect the reliability of the transmission system.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments

Assuming the wires operated by the Distribution Provider do not respond to transmission network flows in an appreciable manner. (Depends on the definition of Distribution Provider. If radial facilities then not necessary).

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

The numbering scheme developed by the Version 0 drafting team looks appropriate. As long as there is consistency in the 3 letter acronym that is relative to the various functions in the NERC functional model.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☒ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
There are no 'show stoppers' that would prevent us from not voting for version 0

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

The deployment of the functional model as reflected in the Version 0 standards will result in significant uncertainties and ambiguities that will potentially compromise regional reliability. This arises from several perspectives – the registration of entities according to the current Functional Model requires that a unitary designation be ascertained for each function, despite the functions being shared or performed by several entities. For example, the Transmission Operator function in the PJM footprint is shared between the RTO/market operator and the physical asset owning entities. Thus there is no method, other than executing complex interleaved agreements among the real entities on behalf of the shared functions. In addition, the Version 0 standards impose mandatory obligations upon the functional model registered entities, yet do not address the present gaps in the reliability coverage of the standards. These are currently not intended to be addressed until the eventual adoption of the Version 1 and subsequent standards. Thus, recognized limitations and problems present in the current standards are not being remedied in the Version 0 process. This will inevitably render it increasingly ambiguous to align the (uncertain delineation of) functions against the real (and often complex relationships among) operating entities against the (weakly enhanced and vague) standards requirements embodied in Version 0. The fact that supporting materials such as guides and references are necessary demonstrates the need for an expeditious transition to the Version 1 reliability standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
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Group Comments (Complete this page if comments are from a group.)

Group Name: **Southern Company Services, Transmission, Planning, Operations and EMS**

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Raymond Vice	Southern Company Services	SERC	1
Jim Griffith	Southern Company Services	SERC	1
Mike Oatts	Southern Company Services	SERC	1
Bill Pope	Gulf Power Company	SERC	3
Phil Winston	Georgia Power Company	SERC	3
James Ford	Southern Company Services	SERC	1
Keith Calhoun	Southern Company Services	SERC	1
Jonathan Glidewell	Southern Company Services	SERC	1
Dan Baisden	Southern Company Services	SERC	1
Bobby Jones	Southern Company Services	SERC	1
Monroe Landrum	Southern Company Services	SERC	1
Rod Hardiman	Southern Company Services	SERC	1
Jim Viikinsalo	Southern Company Services	SERC	1
Dean Ulch	Southern Company Services	SERC	1

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☒ Agree.

☐ Disagree.

Comments

We feel that the Version Zero Reliability Standards should retain the current Draft 2 designation of Reliability Coordinator in recognition of industry concerns over the division of responsibilities between the Reliability Authority and the Reliability Coordinator. Until more is known about the responsibilities of the RA and the RC in the Functional Model world, industry should allow time to better define each of their roles before deciding to vote against V0.

Southern does not support making the RA = RC, nor should the RC register as the RA. If anything, the RC should be added to the functional model, based on it's current role in the industry, and that the RC should register as a RC in the Functional Model world and be responsible for reliability for today and tomorrow timeframes.

We fully support removal of RA from V0.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

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☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
V0 should adopt the Transmission Operator for now and leave implementation of the RA for future versions.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

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☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Alternative B is the preferred choice but we need to be aware that this may require significant enhancements to scheduling systems and may require time to implement.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

We agree that the guides should be included as an attachment, used for reference only. To "throw away" the supporting documentation of current Policy, may leave us nothing to refer back to in understanding how we got to where the Policies have brought us to today.

They are NOT to be used for enforcement but as an attachment, for reference only.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

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- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Southern's initial comments to Draft 1 were to exclude these sections as standards in Version 0. We continue to hold that strong view that they should not be included in Version 0. Southern does encourage an expedited process to reconsider these that are being removed.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

ATC, CBM and TTC address reliability issues and should be retained in Version 0.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Standard 055 addresses reliability issues and should be retained in Version 0..

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Standard 056 addresses a reliability issue and should remain a part of Version 0.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments

The NERC Board of Directors, in its earlier discussion of the standards, stated that the standards were primarily intended to apply to the "interconnected bulk transmission system" at a voltages of 100 kV or greater. Therefore the intent of the standards is to apply to the transmission systems and not the distribution system as this change to the Verson 0 standards would require.

References to Distribution Provider compliance within Standard 060 are not included in the draft document provided for review. While this Standard is potentially applicable to and associated with specific generation connections, protection schemes, and end-use applications, all references to Distribution Provider compliance within these Standards should be carefully worded to specify Generation/Transmission/ Distribution interface issues so as to avoid attempts to impose or misinterpret bulk electric system reliability standards on distribution system reliability practices. In general, this appears to have already been done (for example, Standard 063.2 Analysis and Reporting of Transmission Protection System, Misoperations, states: The Transmission Owner, Generator Owner, Distribution Provider that owns transmission protection system(s) shall analyze all protection system misoperations and shall take corrective actions to avoid future misoperations.) This example attempts to clearly require Distribution Providers that own transmission protection schemes to address misoperations of these transmission schemes and is not intended impose these requirements for other distribution-specific protection schemes.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Unaffiliated Third Party	☐ Delete ☐ Add ☒ Modify	**Not clear if this was intended to be NERC or some other organization(s).**
Transmission Service Provider	☐ Delete ☐ Add ☒ Modify	**The definition says the TSP owns, operates, or controls the transmission facilities. This is not always an accurate statement.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
If a change is made, it should be done now and not later.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

We feel very strongly, that until more is known about the responsibilities of the RA, this term should be dropped from the V0 model. Southern does not support making the RA = RC. Also, the Phase III and Phase IV planning standards should not be reinserted into the third draft.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

We feel that the inclusion of the RA in V0, Draft 2, creates enough confusion for this to be a show stopper for us.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

1. We commend the hard work and dedication that the Drafting Team gave to this tremendous effort.

2. In some cases NERC was changed to "Unaffiliated Third Party" and in other cases reference to NERC was retained. What is the intent "Unaffiliated Third Party"? Why was "Unaffiliated Third Party" not substitited for NERC in all cases?

3. All the standards need to be reviewed for consistency (e.g., Load Serving Entity versus Load-serving Entity), punctuation, and proper grammar.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.1	☒ R ☐ M Number 1.1	**It should be made clear that the requirement to deliver generator unit output to meet projected customer demand in R1-1 should be for those generator units with firm deliverability, even to native load customers. Without designation of the capacity and granting of firm service, it should not be a requirement to build transmission for speculative sources of native load generation.**
52.1	☒ R ☐ M Number 1.2	**Leave out extra "shall" in the second line.**
53.2	☒ R ☐ M Number 2.2	**Remove "Council" from write-up**
13.0	☒ R ☐ M Number	**Standard 013 does not address Local or Regional system conditions. Therefore an additional requirement should be included to address it:** **R1.1.4 [Policy 3D 2.2] When a local or regional system condition or a transmission line overload condition necessitates curtailing Interchange Transactions, the Transmission Service Provider (TSP) and the affected Balancing Authority (BA) shall implement the curtailment and coordinate the modification to the appropriate tags.**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**John K. Loftis, Jr.**	
Organization:	**Dominion - Electric Transmission Planning**	
Telephone:	**(804) 819-2337**	
Email:	**john_loftis@dom.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☒	1 - Transmission Owners
☐ ECAR	☐	2 - RTOs, ISOs, Regional Reliability Councils
☐ FRCC	☐	3 - Load-serving Entities
☐ MAAC	☐	4 - Transmission-dependent Utilities
☐ MAIN	☐	5 - Electric Generators
☐ MAPP	☐	6 - Electricity Brokers, Aggregators, and Marketers
☐ NPCC	☐	7 - Large Electricity End Users
☒ SERC	☐	8 - Small Electricity End Users
☐ SPP	☐	9 - Federal, State, Provincial Regulatory or other Government Entities
☐ WECC		
☐ NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments
Dominion - Electric Transmission Planning is not providing comments on operating standards..

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
Dominion - Electric Transmission Planning is not providing comments on operating standards.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Dominion - Electric Transmission Planning is not providing comments on operating standards.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments
Dominion - Electric Transmission Planning is not providing comments on operating standards.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

The ATC portions of Standard 054 address business practices and should be deleted from Version 0. The TTC portions of Standard 054 address reliability issues and should be retained in Version 0.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
CBM reserves import capability on the transmission system for emergency use to allow the system to withstand the sudden loss of a large generator. Consequently, CBM is a reliability issue, and Standard 055 should be retained in Version 0.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Standard 056 addresses reliability issues and should remain part of Version 0.

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☒ Yes.

☐ No.

Comments

References to Distibution Provider compliance within Standard 060 are not included in the draft document provided for review. While this Standard is potentially applicable to and associated with specific generation connections, protection schemes, and end-use applications, all references to Distribution Provider compliance within these Standards should be carefully worded to specify Generation/Transmission/Distribution interface issues so as to avoid attempts to impose or mis-interpret bulk electric system reliability standards on distribution system reliability practices. In general, this appears to have already been done (for example, Standard 063.2 "Analysis and Reporting of Transmission Protection System, Misoperations" states: The Transmission Owner, Generator Owner, Distribution Provider that owns transmission protection system(s) shall analyze all protection system misoperations and shall take corrective actions to avoid future misoperations. This example attempts to clearly require Distribution Providers that own transmission protection schemes to address misoperations of these transmission schemes and is not intended to impose these requirements for other distribution-specific protection schemes.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Compliance Monitor	☐ Delete ☐ Add ☒ Modify	**The Compliance Monitor needs to be clearly defined and clarification provided to allow those reporting entities to know exactly what is expected.**
Unaffilitated Third Party	☐ Delete ☐ Add ☒ Modify	**Not sure to whom this refers. Clarification and specific references are needed to know exactly which entities perform these roles.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

If the SDT determines that an enhanced numbering scheme is needed, then the new numbering scheme should be made now during this transition rather than having to come back at a later date. As a matter of record, all proposed changes and enhancements should be made now rather than later if they serve to enhance/improve the reliability standards.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Would approve "planning" standards as presented, subject to the comments and feedback provided in the Draft 2 comment forms. Dominion - Electric Transmission Planning is not providing comments on operating standards.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

No show stoppers on the "planning" side. Dominion - Electric Transmission Planning is not providing comments on operating standards.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

1. Need to further define and clarify the roles, responsibilities of the Compliance Monitor, especially as it relates to compliance expectations required from filing entities.

2. Need to further define and clarify what is meant by the term "Unaffilitated Third Party". Why is this term being used? Is it in reference to NERC, or some other entity? Is an "Unaffiliated Third Party" also a "Compliance Monitor"? Whatever is done to define and clarify this term, make sure that it is applied consistently throughout the reliability standards development process.

3. In general, make sure than any changes/enhancements made to one reliability standard are applied consistently to all reliability standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.1	☒ R ☐ M Number 1.1	**Revise the following wording in Requirement R1-1:** **Current Wording: "The Planning Authority and Transmission Planner shall each demonstrate through a valid assessment that its position . . ."** **Proposed Wording: "The Planning Authority and Transmission Planner shall each demonstrate, through valid assessments, that its position . . ."** **Note: Also applies to 051.2, 051.3, and 051.4 (See comments below)**
51.2	☒ R ☐ M Number 2.1	**Same comment as for 51.1 above. Current wording implies that compliance can be demonstated through a single assessment, where, in reality, it takes numerous assessments to adequately evaluate the performance of the transmission system. Proposed wording addresses this issue.**
51.3	☒ R ☐ M Number 3.1	**Same comment as for 51.1 above. Current wording implies that compliance can be demonstated through a single assessment, where, in reality, it takes numerous assessments to adequately evaluate the performance of the transmission system. Proposed wording addresses this issue.**
51.4	☒ R ☐ M Number 4.1	**Same comment as for 51.1 above. Current wording implies that compliance can be demonstated through a single assessment, where, in reality, it takes numerous assessments to adequately evaluate the performance of the transmission system. Proposed wording addresses this issue.**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

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Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **Transmission Subcommittee**

Lead Contact: Robert Reed, TS Chairman

Contact Organization:

Contact Segment:

Contact Telephone: (610) 666-8862

Contact Email: reed@pjm.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Francis Halpin	Bonneville Power Administration	WECC	
Daniel Cooper	Michigan Public Power Agency	ECAR	
Kenneth Donohoo	ERCOT	ERCOT	
Michael Gildea	Constellation Generation Group	SERC	
Thomas Mallinger	Midwest ISO Inc	MAIN	
Darrick Moe	Western Area Power Administratio	MAPP	
Scott Moore	American Electric Power	ECAR	
Thomas Stuchlik	Westar Energy	SPP	
Joseph Styslinger	Southern Wholesale Energy	SERC	
David Thorne	D. H. THorne Consultants	NPCC	
Robert Waldele	New York ISO	NPCC	
Susan Morris	SERC	SERC	
Raymond Palmieri	ECAR	ECAR	
Edward Pfieffer	Ameren Corp	MAIN	
Thomas Vandervort	NERC		

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

Reliability Authority is a function which does not equate one for one with Reliability Coordinator. A Transmission Operator does Reliability Authority functions for lower voltage transmission which a Reliability Coordinator may not have visibility of. A Reliability Coordinator does all of the Reliability Authority functions for the Bulk Transmission facilities within its footprint but a Transmission Operator has Reliability Authority responsibilites as well. See comments to Question 2.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

See comments to question 1. The TS answers this question with a qualifying statement. If industry response to Question 1 favors RC language throughtout the Version 0, Draft 2, Standards, the TS assumes that the checked box above will read "Retain both Transmission Operator and Reliability Coordinator as shown in Version 0 Draft 2." To be clear in its Question 2 response, the TS recommends not using the term Reliability Authority in the Version 0 Draft 2 standards until the Functional Model task group addresses and comes to a definitive conclusion on the RC - RA issue.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

The TS recommends treating the "guides" as reference documents. The TS recommends the guides be totally seperated from the standards - not included with the standards when submitted for industry review or ballot.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

The TS recommends the Phase III and Phase IV Planning Standards not be included in Version 0, Draft 2. For whatever reason the Phase III and Phase IV Planning Standards are not approved at this time. These Standards can be modified and placed into the Standards Process as early as Version 1.

The TS suggests the Phase III and Phase IV Planning Standards be placed into some sort of Reference Document for retention. This would capture the concerns for future discussion, assessment, review, SAR or Version 1 draft standard.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

TTC - TRM - CBM = ATC. The TS believes all of thesee transmission components are justifiably reliability concerns and should remain in a NERC Standard.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
TTC - TRM - CBM = ATC. The TS believes all of thesee transmission components are justifiably reliability concerns and should remain in a NERC Standard.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
TTC - TRM - CBM = ATC. The TS believes all of thesee transmission components are justifiably reliability concerns and should remain in a NERC Standard.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☐ No.

Comments

The question needs clarification. Reviewing Standard 60, the TS could not find where "the Distribution Provider was added . . ." From the TS point of view, any entity that is determining significant, critical, or "wide area" ratings, needs to have requirements to perform the ratings methodology correctly. The Distribution Owner (which is not included in the Functional Model) should be the entity that is responsible for the Standard 60 requirements. TS has two main concerns: 1) Not sure the Distribution Provider has a critical role in determining significant, critical or "wide area" ratings; and 2) Not sure NERC has jurisdiction over the distribution systems.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

As a subcommittee, the TS is not entitled to vote. However, by responding to this question, the TS endorses the progress made to date and encourages future enhancements to the standards, that the SDT is diligently working on.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Bob Birch, Bob Schoneck, John Shaffer**	
Organization:	**FPL**	
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☒	1 - Transmission Owners
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☒ Agree.

☐ Disagree.

Comments

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☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

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DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

FPL sees a 10% requirement on its large dynamic schedules as operator labor intensive and has no significant value added to the IDC accuracy in Florida.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

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On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

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- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
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- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

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- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
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- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments
See response to question #12

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

No, but there are improvements/clarifications that could be made. Please see response to question 12.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Several useful parts of the the Planning Compliance Standards are omitted from Version 0, Draft 2. These are the Introduction Sections, the Guides and the applicable to information.
There is redundancy within the Requrements and Measures sections of Version 0 which gives the text a wordy and unduly prescriptive tone. It is not clear what value the Measures section adds to the Version 0 format as it is for the most part a restatement of what is in the Requirements section. The drafting team should consider incorporating any necessary aspects from the Measures section into the Requirements in the interest of readability and brevity.

An example of how the Version 0 could be stated more succinctly is given below.
Standard 069.2: Special Protection System Database
Requirements:
R2-1. A Regional Reliability Organization that has a Transmission Owner, Generator Owner, or Distribution Provider with a Special Protection System installed shall maintain a Special Protection System database. The database shall include the following types of information: (items a,b&c)

R2-2. The Regional Reliability Organization shall provide to affected Regional Reliability Organization(s) and NERC documentation of its database or the information therein on request (within 30 calendar days).
- -
Comment:R2-2 is a compliance monitoring issue and can be deleted as the applicable reporting time frame is given below under the Compliance Monitoring Process heading.
- -
Measures:
M2-1. The Regional Reliability Organization that has a Transmission Owner, Generator Owner, or Distribution Providers with a Special Protection System installed, shall have a Special Protection System database as defined in R2-1 of this Reliability Standard.

M2-2. The Regional Reliability Organization shall have evidence it provided documentation of its database or the information therein, to affected Regional Reliability Organization(s) and NERC on request (within 30 calendar days).
- -
Comment: M2-2 is redundant and can be deleted. The Regions would supply a database to demonstrate compliance. Supplying evidence also that the database was provided is unnecessary and redundant.
- -

Regional Differences:
Not Identified

Compliance Monitoring Process:
Timeframe:
On request (within 30 calendar days)

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☒ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

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ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:	**Public Service Commission of South Carolina**
Lead Contact:	Philip D. Riley
Contact Organization:	Public Service Commission of South Carolina
Contact Segment:	9
Contact Telephone:	803-896-5154
Contact Email:	philip.riley@psc.state.sc.us

Additional Member Name	Additional Member Organization	Region*	Segment*
John E. Howard	Public Service Commission of SC	NA	9
David A. Wright	Public Service Commission of SC	NA	9
Randy Mitchell	Public Service Commission of SC	NA	9
Elizabeth B. Fleming	Public Service Commission of SC	NA	9
G. O'Neal Hamilton	Public Service Commission of SC	NA	9
Mignon L. Clyburn	Public Service Commission of SC	NA	9
C. Robert Moseley	Public Service Commission of SC	NA	9

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☒ Disagree.

Comments

This approach defeats what we thought was one of the primary objectives of Version 0 Reliability Standards, to make the Standards consistent with the Functional Model. The term Reliability Coordinator is not defined in the Functional Model.

It is critical that neither the standards setting process, nor the functional model, impede the ability of utilities to fulfill their statutory obligations by dictating an RTO like structure or any other structure for the industry. The changes in draft 2 of Version 0 to replace Reliability Authority with Reliability Coordinator have such an effect. It must be recognized that the responsibility, authority, control and liability for the operation of the electric system in their service area is granted to utilities by the states in which they operate. Some states have authorized the transfer of these responsibilities to organizations such as RTOs and ISOs. However, in other parts of the country, the states have taken no such action, and the utility cannot legally assign them to another entity. The utility may contract for certain tasks to be performed by another entity, such as an RC, but it may not delegate final authority, control, responsibility or liability to another entity.

There were no significant problems with incorporating the functional model Reliability Authority in draft 1 that support the change to the term Reliability Coordinator. In addition, the term Reliability Coordinator is not used nor defined in the functional model.

The change to Reliability Coordinator in Version 0 draft 2 would dictate a particular industry structure and for many utilities, compliance would be in violation of their state regulatory

obligations. Such an outcome is unacceptable. Draft 1 of Version 0 recognized the current regulatory reality in the comments section of Standard 33 where it stated, "For areas that intend to assign Reliability Authority functions to current control areas, those Reliability Authorities need to accept responsibility for the reliability coordination standards (33 to 44) while recognizing tasks may be assigned to others, including "upwardly" to a Reliability Coordinator". This is the correct and only acceptable approach. It is clear that the intent in changing the language to RC is to prevent existing control areas from registering as RAs/RCs. However, it is not NERCs function to dictate industry structure and such efforts will be opposed by all available means.

In summary, the term Reliability Coordinator must be deleted from the Version 0 standards, and Reliability Authority must be re-inserted as in draft 1 of Version 0. The comment in Standards 33 Version 0 draft 1 that begins, "For areas that intend to assign Reliability Authority functions to current control areas....." must be re-inserted and highlighted. Further, NERC should impose no limitations or "direction" with regard to who can register as an RA, or any other functional entity.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

EXCEPT do not agree with using the term Reliability Coordinator which is not defined in the Functional Model.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Not for Version 0. These issues should be considered in subsequent review/revision efforts.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Not for Version 0. These issues should be considered in subsequent review/revision efforts.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Not for Version 0. These issues should be considered in subsequent review/revision efforts.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☒ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

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Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

While agree with renumbering concept and convention, if one goal is to minimize confusion when Version 0 Reliability Standards are released for use, it seems appropriate to initially retain the familiar existing numbering system.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

They should either be completely consistent with the Functional Model or remain in the current familiar state until a structured transition can be designed and implemented.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
See responses to Questions 1 and 10.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

A significant number of terms in the Glossary of Terms remain undefined (Disturbance Recovery Criterion, Disturbance Recovery Period, Interconnection Frequency Error, Regional Reliability Organization, Regulating Reserve, Security Analysis Path, etc.). The Public Service Commission of South Carolina still believes the original, well-thought out plan to review and refine the standards one-at-a-time to conform with the Functional Model was a preferable strategy than to revise the Standards in one mass effort. The Public Service Commission of South Carolina believes the Standards, the Compliance-Monitoring Process and the Levels of Non-compliance are too compliance oriented. An entity can meet all compliance requirements and still demonstrate performance lapses which are not sanctioned at all in this process. Why do not all Standards have fields completed for Compliance Monitoring Process and Levels of Non-Compliance?

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

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A revision to Question 7 is the only change that has been made.

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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Howard F. Rulf**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

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SECTION A – OPERATING STANDARDS

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☒ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

RC vs. RA roles need to be clarified. If a BA is an RA, can its TO also be an RA or can the TO have a different RA? Can the RA areas overlap?

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☒ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments
Clarify RC vs. RA and their responsibilities.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
53.0	☐ R ☒ M Number -12.0	**Specifying a specific number of requirements - 16 - will make additional work in revisions if the number of requirements in 053.1-R1-2 changes. Every specific numerical reference like this will need to be found and changed.**
53.2	☒ R ☐ M Number	**Add a TO requirement to insure all affected parties are informed of planned connections in order to do their respective assessments.**
67.4	☐ R ☐ M Number	**Why include LSE here and not also in 067.2 and 067.3?**
20.0	☐ R ☐ M Number	**Attachment 020-1 A. 2. Change Balancing Authorizes to Balancing Authority.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
31.0	☐ R ☐ M Number	**Attachment 031-1 B. Concepts 6). 10 minute should be changed to the Disturbance Recovery Period of 15 minutes.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **NPCC, CP9 Working Group**

Lead Contact: Guy V. Zito

Contact Organization: Northeast Power Coordinating Council

Contact Segment: 2

Contact Telephone: 212-840-1070

Contact Email: gzito@npcc.org

Additional Member Name	Additional Member Organization	Region*	Segment*
George Dunn	New York Power Authority	NPCC	1
Roger Champagne	TransEnergie-(Quebec)	NPCC	1
Kathleen Goodman	ISO-New England	NPCC	2
David Little	Nova Scotia Power	NPCC	1
David Kiguel	Hydro One Networks (Ontario)	NPCC	1
Greg Campoli	New York ISO	NPCC	2
Khaqan Khan	The IMO (Ontario)	NPCC	2
Alan Adamson	The New York State Rel. Council	NPCC	2
Guy Zito	Northeast Power Coord. Council	NPCC	2
Brian Hogue	Northeast Power Coord. Council	NPCC	2
Stanley Kopman	Northeast Power Coord. Council	NPCC	2
Ron Falsetti	The IMO (Ontario)	NPCC	2
Dave Little (also Representing)	New Brunswick Power	NPCC	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

The Version 0 Draft 2 Reliabilty Standards should only designate ONE functional entity as being the highest level of authority, responsible for the "Reliability" of the BES. NPCC strongly suggests the designation used should be the "Reliability Coordinator" to reflect a direct translation of Policy 9. Although NPCC believes that RC is preferable for use in Version 0, we acknowledge the opinion expressed in the ORS/RCWG Letter and if utilization of the Reliability Authority, (RA) is preferred by industry we will support RA however we will continue to maintain only one Reliability designation should be associated with the Version 0 standards as having the highest authority-ultimate responsibility. The Operating Authorities as shown in the existing policies should be properly mapped to either RC, TO or BA as applicable to remove the RA designation.

The functional entity designated with "Reliability" must be the entity with the highest level of authority (ultimate responsibility for) that will act in the interests of reliability for the overall Reliability Coordinator Area "wide area" and the Interconnection

Other sub-entities within a contiguous RC Area may have reliability roles that are specific to a local Area and reportable to the RC. These sub-entities should not have a "Reliability" designation in their title, to avoid confusion during this transitional phase to the Functional Model.

NPCC strongly suggests the existing "Reliability Coordinators ", as designated by the Regions in their respective Reliability Plans, should be the only entities allowed to register as the Version Zero reliability entity, RC.

Any requirements assigned to a Reliability Authority should be divided among the other functional model entities i.e. TO, BA, RC.

NPCC would also like to remind the drafting team that the NERC BOT has stated that the Version 0 Standards must be FULLY implementable along with the associated industry full compliance in February 2005. Full implementation of the Functional Model and designating two entities as having the highest level of authority, as indicated in the posted Glossary, will not only lead to confusion but also not be clearly implementable with clearly defined responsibilities.

NPCC also notes that the Version 0 standards effort should provide valuable input to the review and update of the FM and ultimate full implementation and urges NERC to make this a top priority. The comments submitted to the existing Version 2 BOT approved FM should be evaluated immediately, revisions made, and the FM Version 3 drafted for approval. This, along with the Version 0 Standards, should be NERC's top priority as all the Version 1 Standards will utilize the FM designations.

NPCC believes that this response is full aligned with, and fully supports the more detailed position paper presented by The IMO on the RC/RA issue.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

See comments in Question 1 above. As per our position stated in Q1 above, the RA requirements may be reassigned to either Transmission Operator, Balancing Authority or applicable entities, as appropriate or previously identified in version 1.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Alternative B is the preferred approach and its application shall result in positive impacts on reliability, however NPCC believes that this might be beyond the scope of the drafting team and results in more than a translation. NPCC further suggests that if this represents an impediment to the approval of the Version 0 Standards then Alternative A would be acceptable. This other alternative would allow the work done to date by the Interchange Subcommittee, IS, to develop into a Version 1 SAR/Standard.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

NPCC participating members feel this suggestion is outside of the scope of what the Version 0 Drafting Team was charged to do. The Operating Policies were to be a direct translation and there were to be no requirements added as a result of this translation. We support retaining these as "guides," for the present and recommend their ultimate consideration and incorporation into the Version 1 standard.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

NPCC's participating members agree with the decision of the Version 0 Drafting team to remove these from the Version 0 Draft 2 package. Furthermore, NPCC reiterates its position that these standards have not gone through the entire field testing –revision process or the pilot program. Comments submitted were not addressed nor is there a schedule to do so. These standards should now be subject to the full "ANSI approved" NERC Reliability Standards Development Process.

NPCC also would recommend that those Phase III and IV Standards that are related to Blackout Recommendation could be developed by NERC in an expeditious manner under the process and be completed in 6 months.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

NPCC believes in Standard 54 all the references to ATC should be removed and referred to NAESB and the Standard's requirements as it pertains to TTC should be retained. TTC is a reliability issue and is a value that insures the system is operated in a safe and reliable manner. TTC Standards should be retained to ensure everyone follows a minimum requirement. The other components, CBM, ATC, and TRM define how the Market will be managed to ensure the TTC is not violated.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
NPCC's participating members strongly believe that the 55.1, 55.2, 55.3, and 55.4 should be forwarded to NAESB for development into a business standard. The Capacity Benefit Margin is a commercial issue.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
NPCC's participating members strongly believe Standard 56 should be retained in the Version 0 Standard set as the TRM is utilized in the development of operating limits.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments
It appears that the question being posed is incorrect. There is no mention of "Distribution Provider" in standard -060 (Facility Ratings).

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
RA	☒ Delete ☐ Add ☐ Modify	**(NPCC feels that only RC should appear in these Version 0 standards)**
BES	☐ Delete ☐ Add ☒ Modify	**The definition of BES as posted in the Glossary is too broad-based and all encompassing. NPCC makes a suggestion in Question 11-**
RC	☐ Delete ☐ Add ☒ Modify	**Definition of the RC should be identical to that which appears in Policy 9.**
RA Area	☐ Delete ☐ Add ☒ Modify	**This term should be modified to reflect the RC Area**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

NPCC's participating members believe that the proposed numbering, although it may be sufficient to satisfy all the future needs, should not be applied at this time. There is opportunity to group and rename/renumber the standards after they are approved by the BOT.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

NPCC would vote not to approve and recommend our member systems not to approve the Version 0 Draft 2 Standards based on the "showstoppers" listed in Question 11.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
Ranked in order of importance;

1) RC-RA Issue and Functional Model- NPCC participating members strongly believe there should be only one highest level of authority and strongly recommends the Version 0 drafting team adopt the accurate translation of only the RC and its mapping into the Version 0 Standards. Introduction of the RA along with the RC adds confusion. For the purposes of Registration, NPCC agrees with the NERC RCWG and ORS that only existing RCs as designated by their respective Regional Reliability Plans should register as the highest level of authority. For more specifics please refer to our comments outlined in Question 1 above.

2) Bulk Electric System Definition as listed in the posted Glossary is too broad for consideration and potentially could include everything regardless of how critical it may be to preventing a cascading blackout. NPCC participating members strongly encourage a performance based definition or at least the adoption of similar language that presently appears in the NERC Planning Standards Document which states;
"The NERC Planning Standards, Measurements, and Guides in this report are intended to apply primarily to the bulk electric systems, also referred to as the interconnected transmission systems or networks. Because of the individual character of each of the Regions, it is recommended that each Region define those facilities that are to be included as its bulk electric systems or interconnected transmission systems for which application of the Planning Standards will be required. Any differences from the following Board definition of bulk electric system shall be documented and reported to the NERC Engineering Committee prior to the application or implementation of the Planning Standards in this report."
NPCC could support the posted Version 0 BES definition only with if it is prefaced by a statement similar to the above that the Regions may define what constitues their BES.

3) NPCC's participating members strongly agree with the Version 0 drafting team's decision to remove the non-blackout related Phase III and Phase IV Planning Standards from the Version 0 Standards. If they are reintroduced, NPCC's participating members will be unable to recommend support for the Version 0 Standards. The Phase III and IV Blackout related standards can be developed by NERC in an expeditious manner within the process within a 6 month time period if they are proven necessary to ensuring the reliability of the BES. The remaining Phase III and IV Standards may go through the NERC RS Process on an "as needed" normal timeframe.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Regarding Standard 29-Policy 7
-NPCC's participating members recommend changing R1 to;
Each Reliability Authority, Transmission Operator, Balancing Authority, Transmission Owner, Generator Owner, Generator Operator and Load Serving Entity shall provide adequate and reliable telecommunications facilities internally and with others for the exchange of Interconnection and operating information necessary to maintain reliability. Where applicable, these facilities shall be redundant and diversely routed.
-and changing R2 – R5 from
"Each Reliability Authority, Transmission Operator, and Balancing Authority shall" To
"Each Reliability Authority, Transmission Operator, Balancing Authority, Transmission Owner, Generator Owner, Generator Operator and Load Serving Entity shall"
-Remove R6 and attachment 029-1 should be removed. Those procedures apply to NERCnet users, which is a small subset of community that R1 – R5 apply to. Also, these procedures are the steps for obtaining and using NERCnet. Those procedures should not be part of a Reliability Standard.

In many standards, the Compliance Monitoring Responsibility/role has been assigned to "Compliance Monitor" referred as "Unaffiliated Third Party". This role needs to be clarified and terminology be defined in the Version 0 glossary.

Version 0 Translations need additional work to address the initial requirement of ensuring that they are clear, well defined and measurable. Significant comments would need to be incorporated to meet this criteria. see our specific comments in other questions. We still maintain that the deletion of the "S" statements in the Planning Standards translation has resulted, in a few cases, the weakening of the Standard. NPCC participating members suggest reinstating the language in the Purpose Statement.

In many cases still the references to few of existing policies are not mapped correctly within the new version 0 requirements. (we are facilitating NERC SDT in this matter by identifying such inconsistencies or needs of references). The specifics are mentioned in Q13 below.

A list of specific deficiencies and/or inconsistencies are outlined under the Q13-Table below. We are facilitating NERC SDT in this matter by identifying issues and presenting the associated resolutions. It is expected that our noted/listed concerns (re: under Q13 below) shall be addressed and corresponding improvements in version 0 reliability standards shall be made.

There is a lack of a clear and consistent compliance process. While the standards and requirements are mentioned in all standards, yet in many of the standards the associated Measures, Compliance Monitoring Process and Levels of Non Compliance are missing or not specified. For the purposes of effective implementation/enforcement of these standards, we recommended that the associated measures, compliance monitoring process and levels of non compliance should also be (a) simultaneously mapped/specified where these exist already and (b) specifed/addressed in the very near future, where these do not exist today for consistency.

There still appear to be a few duplications or redundancy of requirements. There is a need to improvement to reduce these redundancies and better group the requirements.
As an example a few standards that show duplications are identified below:
(i) Standard 007 Requirement 5 and Standard 021 Requirement
(ii) Standard 008 Requirement and Standard 021 Requirement

In few standards the levels of non-compliance have not been translated/mapped correctly. As an example, in standard 028 levels of non-compliance have been incorrectly mapped from P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility). (re: more examples: std 028, 025, 027, 031) In general, lack of consistency for the compliance monitoring components is a problem. Some of the standards have compliance levels defined and some do not. There should be consistency.

ATC/CBM/TRM related planning standards contain business related issues and should be forwarded to the NAESB as noted in Question 6.

NPCC's participating members also stongly suggest that NERC revisit the Functional Model BOT approved Version 2 and address the comments submitted by industry during its posting to revise it and develop a Version 3. This should be undertaken immediately.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
6.0	☒ R ☐ M Number 4.0	**Remove the wording "with like values but opposite signs" in order to make more clarity in R4.**
7.0	☒ R ☐ M Number 4.0	**(Also in R5) This needs to be clarified whether these requirements have to be fulfilled by both presently worded RA (i.e. new proposed terminology RC) and TO - "individually or jointly". It is not clear that who would be overall monitor. A more clear role needs to be identified in this standard. Also Reliability entity should be termed as 'RC'. Please see comments in Q1.**
8.0	☐ R ☐ M Number	**(In Purpose)The last sentence should be read as follows: Violations are also reported to the compliance monitor.**
8.0	☐ R ☒ M Number 1.0	**(Measure 1,2 and 3)a complex co-ordination/reporting mechanism requiring that both RA & TO informs/reports IROL/SOL violations to RC, RC then evaluates actions of RA & TO and provides directions to RA/TO to return system within limits. RA/TO to then take corrective actions as directed by RC. The fact is that following a contingency resulting in IROL violation the system has to be returned ASAP and/or within 30 minutes. -continued-**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	**The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in returning the system -ASAP, and in turn would create confusions thereby impacting reliability. There should only be one Reliability designation/entity i.e. RC. See our comments and position outlined in Q1 of NERC comment form re: use of one terminology RC only.**
9.0	☐ R ☐ M Number	**(Purpose)The last sentence be read as: "To ensure voltage levels, reactive flows, and reactive resources are monitored…….. in real time to protect equipment and to ensure/facilitate the reliable operation of the Interconnection"**
12.0	☒ R ☐ M Number 0.0	**Policy 3 B2 (Sharing Interchange schedule details via a secure network) should also be included as a requirement applicable to BA. As an example see standard 34-R3 for its inclusion in this standard as well.**
17.0	☒ R ☐ M Number 5	**R5 refers to neighboring TOs while other sections refer to affected TOs. There is a need to use the same phrase in all sections of standards for purposes of consistency. (in R6) Delete the word- all.**
17.0	☐ R ☐ M Number	**Many of the guides in Policy 4D are in fact criterion that are not included in this std. We are of the opinion that any critical/ criteria needs to incorporated in future via urgent SAR process. The remaining should be mapped into an version 0 accompanying Reference Document.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
18.0	☐ R ☐ M Number	**(Purpose)The statement should be read as follows: To ensure reliability entities have clear decision-making authority and capabilities to take appropriate actions or direct the actions of others to return the transmission system to normal conditions during an emergency.**
18.0	☒ R ☐ M Number 3.0	**In the sentence: "Under these circumstances the Transmission Operator or Generator Operator shall immediately inform the Reliability Coordinator, or Transmission Operator of the inability to perform the directive …" The use of "or" is confusing and may create ambiguity. The specific role of entity responsible for 'providing' and 'receiving' information needs to be clarified. Should this be combined responsibility applicable to all or for any?**
20.0	☒ R ☐ M Number 7.0	**R7(b) should be read as Deploying/utilizing all available operating reserve R7(f) should be read as Reducing/shedding load, …….**
20.0	☐ R ☐ M Number	**(Levels of non-compliance)It is not clear whether the term "plans" mentioned in Level 3 and Level 4 pertain to the requirements R1 to R10 of this standard or refer to plans prescribed in associated std-025. It appears that compliance items are not mapped as per applicable requirements.**
20.0	☐ R ☐ M Number	**(In Attachment 020-1(A-1))This is another example of confusions being created due to dual roles. Only 'RC' terminology should have been used, see our comments outlined in Q1 above. The requirements and sections of this standard outlines that EEA has to be issued by RC and the RA has to make request to RC to issue EEA. The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in issuing EEA's thereby impacting reliability.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
22.0	☐ R ☐ M Number	**(In Attachment 1 of 022-2)Incident No. 7 and footnote should be modified to reflect IROL and a new reference.**
26.0	☐ R ☐ M Number	**(In Purpose)The second line in this section should be read as: Transmission Operator operating with insufficient generation or transmission capacity shall have the capabilities and authority to shed load rather than risk …**
27.0	☐ R ☐ M Number	**(Levels of non-compliance)It appears that the levels of non-compliance refer to the elements outlined in Attachment 027-01. This needs to be clarified. Accordingly, the levels of non-compliance should include the revised wording with specific reference to remove any ambiguity. e.g. Level 1: Plan (elements of Attachment 027-01) exists but is not…**
28.0	☐ R ☐ M Number	**(In Purpose)The following wording is suggested: Each reliability entity shall have a plan to continue …**
28.0	☒ R ☐ M Number 1.0	**The term RC needs to be inserted into section of Applicability.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
28.0	☐ R ☐ M Number	**(Levels of non-compliance)The reference to Requirement R1 should be corrected to P6T3 instead of P6T2** **More important, the levels of non-compliance have been translated/mapped incorrectly from the P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility). The levels of non-compliance should be corrected by mapping/translating the levels from P6T3 not P6T2.**
29.0	☒ R ☐ M Number 1.0	**R1 excludes the transmission owner. "Other RA, TO and BA" should read "affected RC….". In R4 -the requirement needs to be expanded to the transmission owner as well.**
30.0	☐ R ☒ M Number 1.0	**Although the non-compliance regarding the interview verification items 1 and 2 have now been included in this draft (mapped from P8T1) yet the interview verification items 1 and 2 have not been mentioned/mapped (from P8T1) in this standard.**
31.0	☐ R ☐ M Number	**(Levels of non-compliance) "…. not completed Criterion b) of Requirement 1-1." shall be read instead of " … not completed Criterion 2 of Requirement 1." To be consistent with the standard.**
33.0	☐ R ☐ M Number	**The term "reliability entities" needs to be defined to remove ambiguity.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
34.0	☒ R ☐ M Number 1.0	**The last sentence should read "These communication facilities shall be staffed…" instead of "These communications shall be staffed…"**
35.0	☒ R ☐ M Number 2.0	**Reword to ”When a RELIABILITY COORDINATOR is aware of an operational concern, such as declining voltages, excessive reactive flows, or an IROL violation in a neighbouring RELIABILITY COORDINATOR, it shall contact the RELIABILITY COORDINATOR in whose RELIABILITY COORDINATOR AREA the operational concern was observed.”**
37.0	☒ R ☐ M Number 7.0	**The information system (RCIS) related terminology should be used.**
38.0	☒ R ☐ M Number 8.0	**The last sentence should read "The Reliability Coordinator shall disseminate such information within its Reliability Coordinator Area, AS NECESSARY.-In R12-The end of the first sentence should read "…Reliability Coordinators shall be aware of the impact of the operation OF THAT SPECIAL PROTECTION SYSTEM on inter-Area flows."-In R17-This requirement lacks clarity. It needs to be clarified that whether the word “limits” at the end of the last sentence refer to SOL or IROL or both?**
39.0	☒ R ☐ M Number 2.0	**For the purposes of clarity the R2 should read as follows: "A Reliability Coordinator experiencing a potential or actual SOL or IROL violation within its Reliability Coordinator Area shall, at its discretion, select from either a "local" (Regional, Interregional or subregional) or an Interconnection-wide transmission loading relief procedure."-In R6-"interchange scheduling standards" (referred to at the end of the sentence) needs to be clarified to reflect and reference to specific standard.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.0	☒ R ☐ M Number 1.0	**R1-1 Speaks about "planning" the system but does not speak about "designing" the system. We are of the opinion that the drafting team should consider the term are not synonymous and its inclusion in all 4 - 051 standards.- In M1-2-delete "none identified" at the end of the measure.**
53.0	☒ R ☐ M Number 1.0	**R1-1,Requires Transmission Owners to have and document facility connection requirement for Generation, Transmission and End-user facilities to ensure compliance with NERC, Regional standards, as well as power pool criteria…. The term "power pool" should be eliminated and replaced with appropriate FM terms, such as Transmission Operator.**
56.0	☒ R ☒ M Number	**"the Transmission System Providers and Transmission Owners …" shall be read instead of "and the transmission users …" to be consistent with the outlined purpose of this standard.-This also applies to 56.2**
61.7	☒ R ☐ M Number 2.1	**"… load management to Reliability Coordinators and Transmission Operator(s) on request ..." shall be read instead of "…load management to system operators and security center coordinators on request ..." to be consistent with the standard.**
63.2	☒ R ☐ M Number 2.1	**It is suggested to add "facilities" after "…that owns protection system(s)…." In R2-1 and R2-2.** **R2-1 and R2-2 define requirements for transmission, generation owners and Distribution providers, while Standard 053.1 refers to transmission, generation and End-use facilities. 053.2 goes on to infer End-use facilities are owned by Distribution providers and Load Serving Entities (LSE). But 063.2 excludes LSEs. Suggest the same entities be used consistently throughout.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
72.0	☐ R ☐ M Number	**Compliance Monitoring Process-The basic goal of reporting vegetation contact is to more quickly identify the proximity of growing vegetation to critical transmission, and the threat posed, and to further identify possible trends suggesting poor vegetation management on the part of a given TO. It is the opinion of the NPCC Task Force on Coordination of Operation that the above exceptions permitted in the current standard contradict the very intent of the vegetation reporting program-continued-**
	☐ R ☐ M Number	**and considerably weaken the effort.** **Such exceptions must not be permitted if the initiative is to succeed.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **NERC Transmission Issues Subcommittee (TIS)**

Lead Contact: Kirit S. Shah, Chair TIS

Contact Organization: NERC

Contact Segment:

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Additional Member Name	Additional Member Organization	Region*	Segment*
see attached roster of NERC TIS			

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

The NERC Planning Committee (PC) has a primary role to pursue several recommendations which came out from the August 14, 2003, blackout investigation. Of these recommendations, recommendations 7b, 13b, 7a, and 13c have been assigned to the Transmission Issues Subcommittee (TIS).

The recommendation 7a states that, "the PC shall reevalute within one year the effectiveness of the existing reactive and voltage control standards and how they are being implemented in practice in the ten NERC regions. Based on this evaluation, the PC shall recommend revisions to standards or process improvements to ensure voltage control and stability issues are adequately addressed."

While pursuing recommendation 7a, the TIS has noted that the blackout investigation team has referred to violation and/or requirements of the NERC Planning Standards I.D.S1,II.B.S1, III.C.S1 and III.C.S2. However, these standrards, which were included in the Darft 1 of version 0 standards as 064, 059, and 065, respectively, have been dropped in the Draft 2 of version 0 standards. Even though the Standards Drafting Team (SDT) may have good reasons to drop these standards from version 0, the TIS do not believe that it is appropriate to do so. We commend the SDT's recommndation that these standards be immediately reviewed by the Planning Standrads Task Force (PSTF), and should be entered into the standards development process as Urgent Action SARs separate from Version 0. However, what would be the status of these standards in the interim period? The urgent action SAR process, to our knowledge, has been implemented only once before and can still take several months from the beginning till the end to develop the related standards. Additionally, TIS is to complete its assignment on 7a by February 2005, which may include some specific recommendations for revisions to these existing standards. The urgent action SAR process or any other accelerated process (such as sending these standards directly to the standard drafting phase), if implemented, should allow consideration of TIS recommendations.

To facilitate TIS in its efforts to pursue recommendations 7a, these present standards should remain in existence. While this action may require NERC to create another category for these Planning Standards (and possibly others which have been dropped), it would send a strong signal to the industry that these NERC BOD approved standards are still in effect and should continue to be considered in planning and/or operation of the system.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**A. Ralph Rufrano**	
Organization:	**NY Power Authority**	
Telephone:	**(914)- 681 -6265**	
Email:	**rufrano.r@nypa.gov**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*
Stanley Kopman	Northeast Power Coord. Council	NPCC	2
Ron Falsetti	The IMO (Ontario)	NPCC	2
Dave Little (also Representing)	New Brunswick Power	NPCC	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

The Version 0 Draft 2 Reliabilty Standards should only designate ONE functional entity as being the highest level of authority, responsible for the "Reliability" of the BES. NPCC strongly suggests the designation used should be the "Reliability Coordinator" to reflect a direct translation of Policy 9. Although NPCC believes that RC is preferable for use in Version 0, we acknowledge the opinion expressed in the ORS/RCWG Letter and if utilization of the Reliability Authority, (RA) is preferred by industry we will support RA however we will continue to maintain only one Reliability designation should be associated with the Version 0 standards as having the highest authority-ultimate responsibility. The Operating Authorities as shown in the existing policies should be properly mapped to either RC, TO or BA as applicable to remove the RA designation.

The functional entity designated with "Reliability" must be the entity with the highest level of authority (ultimate responsibility for) that will act in the interests of reliability for the overall Reliability Coordinator Area "wide area" and the Interconnection

Other sub-entities within a contiguous RC Area may have reliability roles that are specific to a local Area and reportable to the RC. These sub-entities should not have a "Reliability" designation in their title, to avoid confusion during this transitional phase to the Functional Model.

NPCC strongly suggests the existing "Reliability Coordinators ", as designated by the Regions in their respective Reliability Plans, should be the only entities allowed to register as the Version Zero reliability entity, RC.

Any requirements assigned to a Reliability Authority should be divided among the other functional model entities i.e. TO, BA, RC.

NPCC would also like to remind the drafting team that the NERC BOT has stated that the Version 0 Standards must be FULLY implementable along with the associated industry full compliance in February 2005. Full implementation of the Functional Model and designating two entities as having the highest level of authority, as indicated in the posted Glossary, will not only lead to confusion but also not be clearly implementable with clearly defined responsibilities.

NPCC also notes that the Version 0 standards effort should provide valuable input to the review and update of the FM and ultimate full implementation and urges NERC to make this a top priority. The comments submitted to the existing Version 2 BOT approved FM should be evaluated immediately, revisions made, and the FM Version 3 drafted for approval. This, along with the Version 0 Standards, should be NERC's top priority as all the Version 1 Standards will utilize the FM designations.

NPCC believes that this response is full aligned with, and fully supports the more detailed position paper presented by The IMO on the RC/RA issue.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

See comments in Question 1 above. As per our position stated in Q1 above, the RA requirements may be reassigned to either Transmission Operator, Balancing Authority or applicable entities, as appropriate or previously identified in version 1.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Alternative B is the preferred approach and its application shall result in positive impacts on reliability, however NPCC believes that this might be beyond the scope of the drafting team and results in more than a translation. NPCC further suggests that if this represents an impediment to the approval of the Version 0 Standards then Alternative A would be acceptable. This other alternative would allow the work done to date by the Interchange Subcommittee, IS, to develop into a Version 1 SAR/Standard.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

NPCC participating members feel this suggestion is outside of the scope of what the Version 0 Drafting Team was charged to do. The Operating Policies were to be a direct translation and there were to be no requirements added as a result of this translation. We support retaining these as "guides," for the present and recommend their ultimate consideration and incorporation into the Version 1 standard.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

NPCC's participating members agree with the decision of the Version 0 Drafting team to remove these from the Version 0 Draft 2 package. Furthermore, NPCC reiterates its position that these standards have not gone through the entire field testing –revision process or the pilot program. Comments submitted were not addressed nor is there a schedule to do so. These standards should now be subject to the full "ANSI approved" NERC Reliability Standards Development Process.

NPCC also would recommend that those Phase III and IV Standards that are related to Blackout Recommendation could be developed by NERC in an expeditious manner under the process and be completed in 6 months.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

NPCC believes in Standard 54 all the references to ATC should be removed and referred to NAESB and the Standard's requirements as it pertains to TTC should be retained. TTC is a reliability issue and is a value that insures the system is operated in a safe and reliable manner. TTC Standards should be retained to ensure everyone follows a minimum requirement. The other components, CBM, ATC, and TRM define how the Market will be managed to ensure the TTC is not violated.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
NPCC's participating members strongly believe that the 55.1, 55.2, 55.3, and 55.4 should be forwarded to NAESB for development into a business standard. The Capacity Benefit Margin is a commercial issue.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
NPCC's participating members strongly believe Standard 56 should be retained in the Version 0 Standard set as the TRM is utilized in the development of operating limits.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments
It appears that the question being posed is incorrect. There is no mention of "Distribution Provider" in standard -060 (Facility Ratings).

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
RA	☒ Delete ☐ Add ☐ Modify	**(NPCC feels that only RC should appear in these Version 0 standards)**
BES	☐ Delete ☐ Add ☒ Modify	**The definition of BES as posted in the Glossary is too broad-based and all encompassing. NPCC makes a suggestion in Question 11-**
RC	☐ Delete ☐ Add ☒ Modify	**Definition of the RC should be identical to that which appears in Policy 9.**
RA Area	☐ Delete ☐ Add ☒ Modify	**This term should be modified to reflect the RC Area**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

NPCC's participating members believe that the proposed numbering, although it may be sufficient to satisfy all the future needs, should not be applied at this time. There is opportunity to group and rename/renumber the standards after they are approved by the BOT.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

NPCC would vote not to approve and recommend our member systems not to approve the Version 0 Draft 2 Standards based on the "showstoppers" listed in Question 11.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
Ranked in order of importance;

1) RC-RA Issue and Functional Model- NPCC participating members strongly believe there should be only one highest level of authority and strongly recommends the Version 0 drafting team adopt the accurate translation of only the RC and its mapping into the Version 0 Standards. Introduction of the RA along with the RC adds confusion. For the purposes of Registration, NPCC agrees with the NERC RCWG and ORS that only existing RCs as designated by their respective Regional Reliability Plans should register as the highest level of authority. For more specifics please refer to our comments outlined in Question 1 above.

2) Bulk Electric System Definition as listed in the posted Glossary is too broad for consideration and potentially could include everything regardless of how critical it may be to preventing a cascading blackout. NPCC participating members strongly encourage a performance based definition or at least the adoption of similar language that presently appears in the NERC Planning Standards Document which states;
"The NERC Planning Standards, Measurements, and Guides in this report are intended to apply primarily to the bulk electric systems, also referred to as the interconnected transmission systems or networks. Because of the individual character of each of the Regions, it is recommended that each Region define those facilities that are to be included as its bulk electric systems or interconnected transmission systems for which application of the Planning Standards will be required. Any differences from the following Board definition of bulk electric system shall be documented and reported to the NERC Engineering Committee prior to the application or implementation of the Planning Standards in this report."
NPCC could support the posted Version 0 BES definition only with if it is prefaced by a statement similar to the above that the Regions may define what constitues their BES.

3) NPCC's participating members strongly agree with the Version 0 drafting team's decision to remove the non-blackout related Phase III and Phase IV Planning Standards from the Version 0 Standards. If they are reintroduced, NPCC's participating members will be unable to recommend support for the Version 0 Standards. The Phase III and IV Blackout related standards can be developed by NERC in an expeditious manner within the process within a 6 month time period if they are proven necessary to ensuring the reliability of the BES. The remaining Phase III and IV Standards may go through the NERC RS Process on an "as needed" normal timeframe.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Regarding Standard 29-Policy 7
-NPCC's participating members recommend changing R1 to;
Each Reliability Authority, Transmission Operator, Balancing Authority, Transmission Owner, Generator Owner, Generator Operator and Load Serving Entity shall provide adequate and reliable telecommunications facilities internally and with others for the exchange of Interconnection and operating information necessary to maintain reliability. Where applicable, these facilities shall be redundant and diversely routed.
-and changing R2 – R5 from
"Each Reliability Authority, Transmission Operator, and Balancing Authority shall" To
"Each Reliability Authority, Transmission Operator, Balancing Authority, Transmission Owner, Generator Owner, Generator Operator and Load Serving Entity shall"
-Remove R6 and attachment 029-1 should be removed. Those procedures apply to NERCnet users, which is a small subset of community that R1 – R5 apply to. Also, these procedures are the steps for obtaining and using NERCnet. Those procedures should not be part of a Reliability Standard.

In many standards, the Compliance Monitoring Responsibility/role has been assigned to "Compliance Monitor" referred as "Unaffiliated Third Party". This role needs to be clarified and terminology be defined in the Version 0 glossary.

Version 0 Translations need additional work to address the initial requirement of ensuring that they are clear, well defined and measurable. Significant comments would need to be incorporated to meet this criteria. see our specific comments in other questions. We still maintain that the deletion of the "S" statements in the Planning Standards translation has resulted, in a few cases, the weakening of the Standard. NPCC participating members suggest reinstating the language in the Purpose Statement.

In many cases still the references to few of existing policies are not mapped correctly within the new version 0 requirements. (we are facilitating NERC SDT in this matter by identifying such inconsistencies or needs of references). The specifics are mentioned in Q13 below.

A list of specific deficiencies and/or inconsistencies are outlined under the Q13-Table below. We are facilitating NERC SDT in this matter by identifying issues and presenting the associated resolutions. It is expected that our noted/listed concerns (re: under Q13 below) shall be addressed and corresponding improvements in version 0 reliability standards shall be made.

There is a lack of a clear and consistent compliance process. While the standards and requirements are mentioned in all standards, yet in many of the standards the associated Measures, Compliance Monitoring Process and Levels of Non Compliance are missing or not specified. For the purposes of effective implementation/enforcement of these standards, we recommended that the associated measures, compliance monitoring process and levels of non compliance should also be (a) simultaneously mapped/specified where these exist already and (b) specifed/addressed in the very near future, where these do not exist today for consistency.

There still appear to be a few duplications or redundancy of requirements. There is a need to improvement to reduce these redundancies and better group the requirements.
As an example a few standards that show duplications are identified below:
(i) Standard 007 Requirement 5 and Standard 021 Requirement
(ii) Standard 008 Requirement and Standard 021 Requirement

In few standards the levels of non-compliance have not been translated/mapped correctly. As an example, in standard 028 levels of non-compliance have been incorrectly mapped from P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility). (re: more examples: std 028, 025, 027, 031) In general, lack of consistency for the compliance monitoring components is a problem. Some of the standards have compliance levels defined and some do not. There should be consistency.

ATC/CBM/TRM related planning standards contain business related issues and should be forwarded to the NAESB as noted in Question 6.

NPCC's participating members also stongly suggest that NERC revisit the Functional Model BOT approved Version 2 and address the comments submitted by industry during its posting to revise it and develop a Version 3. This should be undertaken immediately.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
6.0	☒ R ☐ M Number 4.0	**Remove the wording "with like values but opposite signs" in order to make more clarity in R4.**
7.0	☒ R ☐ M Number 4.0	**(Also in R5) This needs to be clarified whether these requirements have to be fulfilled by both presently worded RA (i.e. new proposed terminology RC) and TO - "individually or jointly". It is not clear that who would be overall monitor. A more clear role needs to be identified in this standard. Also Reliability entity should be termed as 'RC'. Please see comments in Q1.**
8.0	☐ R ☐ M Number	**(In Purpose)The last sentence should be read as follows: Violations are also reported to the compliance monitor.**
8.0	☐ R ☒ M Number 1.0	**(Measure 1,2 and 3)a complex co-ordination/reporting mechanism requiring that both RA & TO informs/reports IROL/SOL violations to RC, RC then evaluates actions of RA & TO and provides directions to RA/TO to return system within limits. RA/TO to then take corrective actions as directed by RC. The fact is that following a contingency resulting in IROL violation the system has to be returned ASAP and/or within 30 minutes. -continued-**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	**The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in returning the system -ASAP, and in turn would create confusions thereby impacting reliability. There should only be one Reliability designation/entity i.e. RC. See our comments and position outlined in Q1 of NERC comment form re: use of one terminology RC only.**
9.0	☐ R ☐ M Number	**(Purpose)The last sentence be read as: "To ensure voltage levels, reactive flows, and reactive resources are monitored…….. in real time to protect equipment and to ensure/facilitate the reliable operation of the Interconnection"**
12.0	☒ R ☐ M Number 0.0	**Policy 3 B2 (Sharing Interchange schedule details via a secure network) should also be included as a requirement applicable to BA. As an example see standard 34-R3 for its inclusion in this standard as well.**
17.0	☒ R ☐ M Number 5	**R5 refers to neighboring TOs while other sections refer to affected TOs. There is a need to use the same phrase in all sections of standards for purposes of consistency. (in R6) Delete the word- all.**
17.0	☐ R ☐ M Number	**Many of the guides in Policy 4D are in fact criterion that are not included in this std. We are of the opinion that any critical/ criteria needs to incorporated in future via urgent SAR process. The remaining should be mapped into an version 0 accompanying Reference Document.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
18.0	☐ R ☐ M Number	**(Purpose)The statement should be read as follows: To ensure reliability entities have clear decision-making authority and capabilities to take appropriate actions or direct the actions of others to return the transmission system to normal conditions during an emergency.**
18.0	☒ R ☐ M Number 3.0	**In the sentence: "Under these circumstances the Transmission Operator or Generator Operator shall immediately inform the Reliability Coordinator, or Transmission Operator of the inability to perform the directive …" The use of "or" is confusing and may create ambiguity. The specific role of entity responsible for 'providing' and 'receiving' information needs to be clarified. Should this be combined responsibility applicable to all or for any?**
20.0	☒ R ☐ M Number 7.0	**R7(b) should be read as Deploying/utilizing all available operating reserve R7(f) should be read as Reducing/shedding load, …….**
20.0	☐ R ☐ M Number	**(Levels of non-compliance)It is not clear whether the term "plans" mentioned in Level 3 and Level 4 pertain to the requirements R1 to R10 of this standard or refer to plans prescribed in associated std-025. It appears that compliance items are not mapped as per applicable requirements.**
20.0	☐ R ☐ M Number	**(In Attachment 020-1(A-1))This is another example of confusions being created due to dual roles. Only 'RC' terminology should have been used, see our comments outlined in Q1 above. The requirements and sections of this standard outlines that EEA has to be issued by RC and the RA has to make request to RC to issue EEA. The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in issuing EEA's thereby impacting reliability.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
22.0	☐ R ☐ M Number	**(In Attachment 1 of 022-2)Incident No. 7 and footnote should be modified to reflect IROL and a new reference.**
26.0	☐ R ☐ M Number	**(In Purpose)The second line in this section should be read as: Transmission Operator operating with insufficient generation or transmission capacity shall have the capabilities and authority to shed load rather than risk …**
27.0	☐ R ☐ M Number	**(Levels of non-compliance)It appears that the levels of non-compliance refer to the elements outlined in Attachment 027-01. This needs to be clarified. Accordingly, the levels of non-compliance should include the revised wording with specific reference to remove any ambiguity. e.g. Level 1: Plan (elements of Attachment 027-01) exists but is not…**
28.0	☐ R ☐ M Number	**(In Purpose)The following wording is suggested: Each reliability entity shall have a plan to continue …**
28.0	☒ R ☐ M Number 1.0	**The term RC needs to be inserted into section of Applicability.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
28.0	☐ R ☐ M Number	**(Levels of non-compliance)The reference to Requirement R1 should be corrected to P6T3 instead of P6T2** **More important, the levels of non-compliance have been translated/mapped incorrectly from the P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility). The levels of non-compliance should be corrected by mapping/translating the levels from P6T3 not P6T2.**
29.0	☒ R ☐ M Number 1.0	**R1 excludes the transmission owner. "Other RA, TO and BA" should read "affected RC….". In R4 -the requirement needs to be expanded to the transmission owner as well.**
30.0	☐ R ☒ M Number 1.0	**Although the non-compliance regarding the interview verification items 1 and 2 have now been included in this draft (mapped from P8T1) yet the interview verification items 1 and 2 have not been mentioned/mapped (from P8T1) in this standard.**
31.0	☐ R ☐ M Number	**(Levels of non-compliance) "…. not completed Criterion b) of Requirement 1-1." shall be read instead of " … not completed Criterion 2 of Requirement 1." To be consistent with the standard.**
33.0	☐ R ☐ M Number	**The term "reliability entities" needs to be defined to remove ambiguity.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
34.0	☒ R ☐ M Number 1.0	**The last sentence should read "These communication facilities shall be staffed…" instead of "These communications shall be staffed…"**
35.0	☒ R ☐ M Number 2.0	**Reword to ”When a RELIABILITY COORDINATOR is aware of an operational concern, such as declining voltages, excessive reactive flows, or an IROL violation in a neighbouring RELIABILITY COORDINATOR, it shall contact the RELIABILITY COORDINATOR in whose RELIABILITY COORDINATOR AREA the operational concern was observed.”**
37.0	☒ R ☐ M Number 7.0	**The information system (RCIS) related terminology should be used.**
38.0	☒ R ☐ M Number 8.0	**The last sentence should read "The Reliability Coordinator shall disseminate such information within its Reliability Coordinator Area, AS NECESSARY.-In R12-The end of the first sentence should read "…Reliability Coordinators shall be aware of the impact of the operation OF THAT SPECIAL PROTECTION SYSTEM on inter-Area flows."-In R17-This requirement lacks clarity. It needs to be clarified that whether the word “limits” at the end of the last sentence refer to SOL or IROL or both?**
39.0	☒ R ☐ M Number 2.0	**For the purposes of clarity the R2 should read as follows: "A Reliability Coordinator experiencing a potential or actual SOL or IROL violation within its Reliability Coordinator Area shall, at its discretion, select from either a "local" (Regional, Interregional or subregional) or an Interconnection-wide transmission loading relief procedure."-In R6-"interchange scheduling standards" (referred to at the end of the sentence) needs to be clarified to reflect and reference to specific standard.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.0	☒ R ☐ M Number 1.0	**R1-1 Speaks about "planning" the system but does not speak about "designing" the system. We are of the opinion that the drafting team should consider the term are not synonymous and its inclusion in all 4 - 051 standards.- In M1-2-delete "none identified" at the end of the measure.**
53.0	☒ R ☐ M Number 1.0	**R1-1,Requires Transmission Owners to have and document facility connection requirement for Generation, Transmission and End-user facilities to ensure compliance with NERC, Regional standards, as well as power pool criteria…. The term "power pool" should be eliminated and replaced with appropriate FM terms, such as Transmission Operator.**
56.0	☒ R ☒ M Number	**"the Transmission System Providers and Transmission Owners …" shall be read instead of "and the transmission users …" to be consistent with the outlined purpose of this standard.-This also applies to 56.2**
61.7	☒ R ☐ M Number 2.1	**"… load management to Reliability Coordinators and Transmission Operator(s) on request ..." shall be read instead of "…load management to system operators and security center coordinators on request ..." to be consistent with the standard.**
63.2	☒ R ☐ M Number 2.1	**It is suggested to add "facilities" after "…that owns protection system(s)…." In R2-1 and R2-2.** **R2-1 and R2-2 define requirements for transmission, generation owners and Distribution providers, while Standard 053.1 refers to transmission, generation and End-use facilities. 053.2 goes on to infer End-use facilities are owned by Distribution providers and Load Serving Entities (LSE). But 063.2 excludes LSEs. Suggest the same entities be used consistently throughout.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
72.0	☐ R ☐ M Number	**Compliance Monitoring Process-The basic goal of reporting vegetation contact is to more quickly identify the proximity of growing vegetation to critical transmission, and the threat posed, and to further identify possible trends suggesting poor vegetation management on the part of a given TO. It is the opinion of the NPCC Task Force on Coordination of Operation that the above exceptions permitted in the current standard contradict the very intent of the vegetation reporting program-continued-**
	☐ R ☐ M Number	**and considerably weaken the effort.** **Such exceptions must not be permitted if the initiative is to succeed.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☐	1 - Transmission Owners
☐ ECAR	☐	2 - RTOs, ISOs, Regional Reliability Councils
☐ FRCC	☒	3 - Load-serving Entities
☒ MAAC	☐	4 - Transmission-dependent Utilities
☒ MAIN	☒	5 - Electric Generators
☐ MAPP	☒	6 - Electricity Brokers, Aggregators, and Marketers
☒ NPCC	☐	7 - Large Electricity End Users
☐ SERC	☐	8 - Small Electricity End Users
☐ SPP	☐	9 - Federal, State, Provincial Regulatory or other Government Entities
☒ WECC		
☐ NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

Group Name: **PPL Generation and PPL EnergyPlus**

Lead Contact: Mark A. Heimbach

Contact Organization: PPL Generation and PPL EnergyPlus

Contact Segment: 5

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Additional Member Name	Additional Member Organization	Region*	Segment*
Rose Spear	PPL EnergyPlus	WECC	6
Larry Gruel	PPL EnergyPlus	WECC	6
Lance Elias	PPL EnergyPlus	WECC	6
Jon Williamson	PPL EnergyPlus	WECC	6
Tom Hyzinski	PPL EnergyPlus	MAAC	6
Mark Heimbach	PPL Generation	MAAC	5
Mark Heimbach	PPL Generation	MAIN	5
Mark Heimbach	PPL Generation	NPCC	5
Mark Heimbach	PPL Generation	WECC	5

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments
No position.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
No position.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

We support the existing policy as presently stated in alternative A. As the industry moves to different methods of processing dynamic schedules we feel that an alternative method should be produced but we cannot support Alternative B at this time. We also feel that R5.1 with 10% is too restrictive.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments
They should be kept elsewhere as reference documents.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments
These standards should go through the full development process as regular SARs.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections.

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments
No position.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Ramp	☐ Delete ☒ Add ☐ Modify	**See comment in question #13 related to Standard #24.**
Ramp schedules	☐ Delete ☒ Add ☐ Modify	**See comment in question #13 related to Standard #24.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments
We would vote yes if the concerns expressed in these comments are satisfactorily addressed.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
No.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Glossary - would like to see the final definitions of those terms currently marked as "TBD."

Operating Standards - There are many items marked as "not specified" in the draft Operating Standards. In some cases, these open items are cause for concern for us. Additional responsibilities could be assigned without allowing any way to comment.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
11.0	☒ R ☐ M Number 1.0	**The existing Policy 3 and E-Tag 1.7 Specifications provide for all PSEs to receive a copy of the tag and to optionally particpate in the approval process. Both NERC's Version 0 standards and NAESB's Companion Business Practices should be reviewed to ensure that this existing capability is retained.**
13.0	☒ R ☐ M Number 5.0	**See comments associated with question #3.**
22.0	☒ R ☐ M Number 3.0	**The reporting requirements under this Standard should remain with the Regional Reliability Organization or RC/RA. It should not be the obligation of a Generator Operator or Load Serving Entity. The involved GO or LSE should provide information to the reporting authority but not be the ones responsible for ultimately submitting the report.**
24.0	☒ R ☐ M Number 10.0	**Policy 6A2.5 states that "All generator owners shall operate their plant so as to adhere to ramp schedules." Proposed Standard 24R10 deletes this statement and appears to move the responsibility for adhering to ramp schedules to the Balancing Authority. Is this apparent transfer of responsibility what is intended? If so, how is it supposed to work? Comment continued in next entry field (below).**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
24.0	☒ R ☐ M Number 10.0	**Comment continued from above.** **The definition of Balancing Authority indicates a high level entity - how will that entity exercise control down to the plant level where the ramping is actually done? Should a definition of "ramp" and "ramp schedules" be included in the glossary?**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **South Carolina Public Service Authority (SCPSA)**

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Contact Organization: SCPSA

Contact Segment: 1

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Additional Member Name	Additional Member Organization	Region*	Segment*
Tom Abrams	SCPSA	SERC	1
Glenn Stephens	SCPSA	SERC	1
Jim Peterson	SCPSA	SERC	1
William Gaither	SCSPA	SERC	1
Vicky Budreau	SCPSA	SERC	1
Maxie Chaplin	SCPSA	SERC	5
RM Singletary	SCPSA	SERC	6

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☒ Disagree.

Comments

It appears that the ANSI-approved process will be violated if the "Reliability Coordinator" entity is introduced into the Version 0 standards. SCPSA believes that only functions included in the Functional Model at the time the Version 0 SAR was drafted should be included.

In addition, with Draft 2 as written along with instructions from NERC that would preclude SCPSA from registering as a Reliability Authority or Reliability Coordinator, it appears that SCPSA would need to transfer existing authority and responsibility for certain functions to another entity in order to satisfy the requirements of the standards. Not only do we believe this would conflict with our enabling legislation and represent a violation of State Law, but also we believe that the imposition of a responsibility transfer of this nature through a standards-making process is inappropriate.

We believe the Draft 1 language accomodated SCPSA's situation by recognizing that "RELIABILITY AUTHORITIES need to accept responsibility for the reliability coordination standards (33 to 41) while recognizing tasks may be assigned to others, including "upwardly" to a Reliability Coordinator. Accountability for compliance with standards, however, remains with the RELIABILITY AUTHORITY." This approach was acceptable to SCPSA, provided SPCSA would be permitted to register as a Reliability Authority.

We are recommending removing the entity "Reliability Coordinator" from the Version 0 standards and reinstating the "Reliability Authority" as in Draft 1. In addition, NERC should not impose any

restrictions with regard to who may register as a Reliability Authority or any other entity defined in the existing Functional Model.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

We are recommending removing the entity "Reliability Coordinator" from the Version 0 standards and reinstating the "Reliability Authority" as in Draft 1. Refer to response to Question 1.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

The ATC portions of Standard 054 address business practices and should be deleted from Version 0. The TTC portions address reliability issues and should be retained in Version 0.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
Standard 055 address business practices and should be deleted from Version 0.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Standard 056 addresses a reliability issue and should remain a part of Version 0.

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☒ Yes.

☐ No.

Comments

References to Distribution Provider compliance within Standard 060 are not included in the draft document provided for review. While this Standard is potentially applicable to and associated with specific generation connections, protection schemes, and end-use applications, all references to Distribution Provider compliance within these Standards should be carefully worded to specify Generation/Transmission/ Distribution interface issues so as to avoid attempts to impose or misinterpret bulk electric system reliability standards on distribution system reliability practices. In general, this appears to have already been done (for example, Standard 063.2 Analysis and Reporting of Transmission Protection System, Misoperations, states: The Transmission Owner, Generator Owner, Distribution Provider that owns transmission protection system(s) shall analyze all protection system misoperations and shall take corrective actions to avoid future misoperations. This example attempts to clearly require Distribution Providers that own transmission protection schemes to address misoperations of these transmission schemes and is not intended impose these requirements for other distribution-specific protection schemes.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
"Unaffiliated Third Party"	☐ Delete ☒ Add ☐ Modify	**Not clear if this was intended to be NERC or some other organization(s).**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
If a change is made, it should be done now and not later.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

SCPSA would consider voting to approve the standards if (1) industry consensus comments that are consistent with the ANSI-approved standards development process and the guidelines set forth in the associated SAR for version 0 are incorporated into the standards, (2) only entities included in the Functional Model at the time the SAR was developed are included in the standards, (3) there are no associated restrictions on which entities may register for the associated functions, and (4) the Phase III and Phase IV Planning Standards are removed from the standards.

Note that SCPSA agrees with pursuing standards to address many of the issues in the Phase III and Phase IV Planning Standards. However, we understand the version 0 process is intended to be a process of translation, and as such we believe the existing Phase III and Phase IV Planning Standards should receive the full benefits of being implemented through the ANSI-approved standards process.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

SCPSA would consider voting to approve the standards if (1) industry consensus comments that are consistent with the ANSI-approved standards development process and the guidelines set forth in the associated SAR for version 0 are incorporated into the standards, (2) only entities included in the Functional Model at the time the SAR was developed are included in the standards, (3) there are no associated restrictions on which entities may register for the associated functions, and (4) the Phase III and Phase IV Planning Standards are removed from the standards.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

1. In some cases NERC was changed to "Unaffiliated Third Party" and in other cases reference to NERC was retained. What is the intent "Unaffiliated Third Party"? Why was "Unaffiliated Third Party" not substitited for NERC in all cases?

2. All the standards need to be reviewed for consistency (e.g., Load Serving Entity versus Loadserving Entity), punctuation, and proper grammar.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.1	☒ R ☐ M Number 1.0	**Need to define valid assessment or state that if the listed items are included then the assessment is valid.** **This also applies to 51.2, R-1; 51.3, R-1; and 51.4, R-1.**
51.1	☐ R ☒ M Number 1.0	**Revise the following "provided assessments and corrective plans" to read "performed assessments and developed corrective plans ." M1-1 refers to the requirements R1-1 and R1-2. These requirements are for performing assessments and developing corrective plans. The providing requirements is R1-3. Therefore, M1-1 should say performed assessments and developed corrective plans, not provided them.** **This also applies to 51.2, M-1; and 51.3, M-1.**
51.1	☐ R ☒ M Number 2.0	**Delete - "None Identified"**
51.2	☒ R ☐ M Number 2.0	**Change the word "their" to "its" in the first sentence in item a).**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.4	☒ R ☐ M Number 1.0	**Remove the last sentence "The controlled interruption of customer demand, the planned removal of generators, or the curtailment of firm (non-recallable reserved) power transfers maybe necessary to meet this standard." This sentence is not correct since this measurement has assestment requirement only, and no corrective actions required.**
51.4	☐ R ☒ M Number 1.0	**Revise the following "shall provide assessments" to read "shall provide evidence that it performed assessments." M4-1 refers to the requirements R4-1. This requirement is for performing assessments. The providing requirement is R4-2. Therefore, M4-1 should say provide evidence that it performed assessments, not provided them.**
51.4	☐ R ☒ M Number 2.0	**In M4-2, change the reference "051.4 R4-1" to "051.4 R4-2."**
52.1	☒ R ☐ M Number 2.0	**Delete the second "shall" in the sentence.**
53.1	☐ R ☒ M Number 2.0	**Delete the phrase "for generation facilities, transmission facilities, and end-user facilities" from the measurement. R1-1 requires that facility connection requirements cover generation facilities, transmission facilities, and end-user facilities. R1-2 requires that the facility connection requirements contain the 16 items given. Since M1-2 refers to the requirements in R1-2, there is no need for the words "generation facilities, transmission facilities, and end-user facilities" in M1-2.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
53.2	☒ R ☐ M Number 1.0	**Revise the following to read "R 2-1. The Generator Owner, Transmission Owner, Distribution Provider, or Load Serving Entity seeking to integrate generation facilities, transmission facilities, and electricity end-user facilities shall coordinate and cooperate with the Transmission owner with which they seek to connect, and other appropriate entities, on their respective assessments." This change is needed to identify who should be coordinated with.**
53.2	☒ R ☐ M Number 1.0	**The phrase "evaluate the reliability impact of the new facilities and their connections on the interconnected transmission systems" is used redundantly in the introductory sentence and under item a). Delete the first occurrence.**
53.2	☒ R ☐ M Number 2.0	**Delete the word "council."**
54.0	☐ R ☐ M Number	**Purpose: The last sentence is redundant, delete it.**
54.1	☒ R ☐ M Number 1.0	**d). Reinsert the word "how" such that it reads "A description of how incomplete…"** **f). Change "Indication that treatment" to "An indication of the treatment..."** **g). Insert "A" at the beginning of the sentence.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
55.3	☒ R ☐ M Number 2.0	**Revise "their Capacity Benefit Margin use…" to "their Use of Capacity Benefit Margin…" Change all other occurrences in Levels of Non-Compliance 1 and 4.**
55.4	☒ R ☐ M Number 1.0	**Delete "Capacity Benefit Margin use" at the end of the last sentence.**
56.0	☐ R ☐ M Number	**Purpose: In the first sentence change the term "Transmission System Providers and Transmission Owners…" to "Transmission Service Providers..." changing "System" to "Service" and deleting the reference to Transmission Owners.** **The Functional Model implies that TRM is determined solely by Transmission Service Providers.**
58.1	☐ R ☐ M Number	**Timeframe: Change "058.2-R2-M1" to "058.2-R2-1".**
58.2	☒ R ☐ M Number 1.0	**Add the following after the first sentence: "The procedures shall include the identification of the entities responsible for the reporting of the data (referred to in 058.1 as 'Responsible Entity')".**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.3	☐ R ☐ M Number	**Change all references throughout the standard to "Reliability Standard 058.4-R4" and "Reliability Standard 058-R4" to "Reliability Standard 058.4-R4-1."**
58.4	☒ R ☐ M Number 1.0	**Add the following after the first sentence: "The procedures shall include the identification of the entities responsible for the reporting of the data (referred to in 058.3 as 'Responsible Entity')".**
58.4	☒ R ☐ M Number 1.0	**In item d), change the reference to "Reliability Standard 058.1-R1" to "Reliability Standard 058.1-R1-1."**
58.6	☒ R ☐ M Number 2.0	**To be consistent with 058.5 R5-1, combine 058.6 R6-2 with R6-1.**
60.0	☐ R ☐ M Number	**In both 060.1 and 060.2, to be consistent use either "methodology(ies)" or "methodology(s)." Both are now used at various places throughout the standards.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
60.1	☐ R ☐ M Number	**Levels of Non-compliance: Change references to "elements (1-5)" to "elements (a-e)."**
61.5	☐ R ☒ M Number 1.0	**The measurement does not appear to be addressing the focus of 061.5. Change the term "actual and forecast demand data was" to read "nonmember entity demand data and forecast uncertainties were."**
61.5	☐ R ☐ M Number	**Levels of Non-compliance: in Level 1 change "061.5-R51- items a) or 061.5-R51- b)" to read "061.5-R5-1 item a or b." In Level 2 change "061.5-R51- items a) and 061.5-R51-b)" to read "061.5-R5-1 items a and b."**
61.6	☒ R ☐ M Number 1.0	**Change "Regions" to "Regional Reliability Organizations."**
61.6	☐ R ☐ M Number	**Levels of Non-compliance, Level 4: While it is a direct transulation, the term "controlled demand-side management data" should be changed to "interruptible demands and direct control load management" to be consistent with the rest of the standard.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
61.7	☒ R ☐ M Number 1.0	**Change "system operators and security center coordinators" to "Reliability Authority(ies) and Transmission Operator(s)" to be consistent with 061.7 M7-1.**
61.8	☐ R ☒ M Number 1.0	**M8-1 is basically a repeat of R8-1. To be consistent with similar measurements, revise it to read: "The Load Serving Entity's, Planning Authority's and Resource Planner's forecasts shall each be clearly documented per Reliability Standard 061.8-R8-1."**
61.8	☐ R ☒ M Number 2.0	**M8-2 is basically a repeat of R8-2. To be consistent with similar measurements, revise it to read: "The Load Serving Entity's, Planning Authority's and Resource Planner's forecasts shall each include information per Reliability Standard 061.8-R8-2."**
63.2	☒ R ☐ M Number 1.0	**Add the word "and" between "Generator Owner" and "Distribution Provider."** **This also applies to R2-2.**
63.3	☒ R ☐ M Number 2.0	**Include Distribution Providers that owns transmission protection system(s). Since they are included in 62.2 they should also be included in 63.3.** **This change should also be applied to measures M3-1 and M3-2.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
67.0	☐ R ☐ M Number	**General Comments:** **1. There needs to be consistency in the use of either "Under Frequency" or "Underfrequency." The current compliance templates use "Underfrequency."**
67.1	☒ R ☐ M Number 1.0	**Un-capitalize the word "Program" in the first sentence and in item c.**
67.1	☐ R ☒ M Number 1.0	**Un-capitalize the words "Program" and "Current."**
67.2	☐ R ☐ M Number	**Levels of Non-compliance, Level-1: change the reference to "Reliability Standard 067.1-R1" to read "Reliability Standard 067.1-R1-1."**
67.4	☐ R ☐ M Number	**General Comment:** **Since load serving entities are not included in Standards 067.2 and 067.3, they should also not appear in 067.4.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
67.4	☒ R ☐ M Number 1.0	**Insert a comma between the words "program" and "shall," such that it reads "…required by the Regional Reliability Organization to have an underfrequency load shedding program, shall analyze…"**
67.4	☐ R ☒ M Number 1.0	**Change M4-1 to read: "The Transmission Owner's, Transmission Operator's, and Distribution Provider's (required by the Regional Reliability Organization to have an underfrequency load shedding program) analysis and documentation of underfrequency load shedding program performance following an underfrequency event shall include all elements identified in Reliability Standard 067.4-R4-1."This change is needed to fix the incorrect use of the apostrophe in the phrase "shedding program's analysis".**
68.0	☐ R ☐ M Number	**Purpose: Revise the end of the first sentence from "…requiring end users of electricity on the bulk electric system to drop loads" to read "requiring the interruption of electrical supply to end users."**
68.0	☐ R ☐ M Number	**General Comments:** **1. There needs to be consistency in the use of either "Under Voltage" or "Undervoltage." The original compliance templates used "Undervoltage."** **2. Since load serving entities are not included in Standard 067, they should also not appear in Standard 068.**
68.3	☐ R ☒ M Number 1.0	**Revise the phrase "shall include" to read "shall have an assessment which includes."**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
68.3	☐ R ☐ M Number	**Levels of Non-compliance, Level 4: revise the reference to "Reliability Standard 068.3-R3" to read "Reliability Standard 068.3-R3-1."**
69.3	☒ R ☐ M Number 2.0	**Change the term "Reliability Authorities" to read "Regional Reliability Organizations."**
69.3	☐ R ☐ M Number	**Levels of Non-compliance: Levels 1 and 2 use the phrase "The summary (or detailed) Regional Reliability Organization Special Protection System assessment," while Levels 3 and 4 use "The Regional Reliability Organization's summary (or detailed) Regional Reliability Organization Special Protection System assessment." This needs to be made consistent.**
70.1	☒ R ☐ M Number 1.0	**The Testing Frequency requirement listed in R1-1c should clarify that generator owners who own less than three blackstart units do not have to retest the same unit consecutively (every year) as long as the generator owner tests its blackstart unit(s) every three years.**
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Dave Little**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*
David Little	Nova Scotia Power	NPCC	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

The Version 0 Draft 2 Reliabilty Standards should only designate ONE functional entity as being the highest level of authority, responsible for the "Reliability" of the BES. NSPI strongly suggests the designation used should be the "Reliability Coordinator" to reflect a direct translation of Policy 9. Although NSPI believes that RC is preferable for use in Version 0, we acknowledge the opinion expressed in the ORS/RCWG Letter and if utilization of the Reliability Authority, (RA) is preferred by industry we will support RA however we will continue to maintain only one Reliability designation should be associated with the Version 0 standards as having the highest authority-ultimate responsibility. The Operating Authorities as shown in the existing policies should be properly mapped to either RC, TO or BA as applicable to remove the RA designation.

The functional entity designated with "Reliability" must be the entity with the highest level of authority (ultimate responsibility for) that will act in the interests of reliability for the overall Reliability Coordinator Area "wide area" and the Interconnection

Other sub-entities within a contiguous RC Area may have reliability roles that are specific to a local Area and reportable to the RC. These sub-entities should not have a "Reliability" designation in their title, to avoid confusion during this transitional phase to the Functional Model.

NSPI strongly suggests the existing "Reliability Coordinators ", as designated by the Regions in their respective Reliability Plans, should be the only entities allowed to register as the Version Zero reliability entity, RC.

Any requirements assigned to a Reliability Authority should be divided among the other functional model entities i.e. TO, BA, RC.

NSPI would also like to remind the drafting team that the NERC BOT has stated that the Version 0 Standards must be FULLY implementable along with the associated industry full compliance in February 2005. Full implementation of the Functional Model and designating two entities as having the highest level of authority, as indicated in the posted Glossary, will not only lead to confusion but also not be clearly implementable with clearly defined responsibilities.

NSPI also notes that the Version 0 standards effort should provide valuable input to the review and update of the FM and ultimate full implementation and urges NERC to make this a top priority. The comments submitted to the existing Version 2 BOT approved FM should be evaluated immediately, revisions made, and the FM Version 3 drafted for approval. This, along with the Version 0 Standards, should be NERC's top priority as all the Version 1 Standards will utilize the FM designations.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

See comments in Question 1 above. As per our position stated in Q1 above, the RA requirements may be reassigned to either Transmission Operator, Balancing Authority or applicable entities, as appropriate or previously identified in version 1.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Alternative B is the preferred approach and its application will result in positive impacts on reliability, however NSPI believes that this might be beyond the scope of the drafting team and results in more than a translation. NSPI further suggests that if this represents an impediment to the approval of the Version 0 Standards then Alternative A would be acceptable. This other alternative would allow the work done to date by the Interchange Subcommittee, IS, to develop into a Version 1 SAR/Standard.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

NSPI feels this suggestion is outside of the scope of what the Version 0 Drafting Team was charged to do. The Operating Policies were to be a direct translation and there were to be no requirements added as a result of this translation. We support retaining these as "guides," for the present and recommend their ultimate consideration and incorporation into the Version 1 standard.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

NSPI agrees with the decision of the Version 0 Drafting team to remove these from the Version 0 Draft 2 package. Furthermore, NSPI reiterates its position that these standards have not gone through the entire field testing –revision process or the pilot program. Comments submitted were not addressed nor is there a schedule to do so. These standards should now be subject to the full "ANSI approved" NERC Reliability Standards Development Process.

NSPI also would recommend that those Phase III and IV Standards that are related to Blackout Recommendation could be developed by NERC in an expeditious manner under the process and be completed in 6 months.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

NSPI believes in Standard 54 all the references to ATC should be removed and referred to NAESB and the Standard's requirements as it pertains to TTC should be retained. TTC is a reliability issue and is a value that insures the system is operated in a safe and reliable manner. TTC Standards should be retained to ensure everyone follows a minimum requirement. The other components, CBM, ATC, and TRM define how the Market will be managed to ensure the TTC is not violated.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
NSPI strongly believes that the 55.1, 55.2, 55.3, and 55.4 standard sections should be forwarded to NAESB for development into a business standard. The Capacity Benefit Margin is a commercial issue.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
NSPI strongly believes that Standard 56 should be retained in the Version 0 Standard set as the TRM is utilized in the development of operating limits.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments
It appears that the question being posed is incorrect. There is no mention of "Distribution Provider" in standard -060 (Facility Ratings).

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
RA	☒ Delete ☐ Add ☐ Modify	**(NSPI feels that only RC should appear in these Version 0 standards)**
BES	☐ Delete ☐ Add ☒ Modify	**The definition of BES as posted in the Glossary is too broad-based and all encompassing. NPCC makes a suggestion in Question 11-**
RC	☐ Delete ☐ Add ☒ Modify	**Definition of the RC should be identical to that which appears in Policy 9.**
RA Area	☐ Delete ☐ Add ☒ Modify	**This term should be modified to reflect the RC Area**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

NSPI believes that the proposed numbering, although it may be sufficient to satisfy all the future needs, should not be applied at this time. There is opportunity to group and rename/renumber the standards after they are approved by the BOT.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

NSPI would vote not to approve the Version 0 Draft 2 Standards based on the "showstoppers" listed in Question 11.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
Ranked in order of importance;

1) RC-RA Issue and Functional Model- NSPI strongly believes there should be only one highest level of authority and strongly recommends the Version 0 drafting team adopt the accurate translation of only the RC and its mapping into the Version 0 Standards. Introduction of the RA along with the RC adds confusion. For the purposes of Registration, NSPI agrees with the NERC RCWG and ORS that only existing RCs as designated by their respective Regional Reliability Plans should register as the highest level of authority. For more specifics please refer to our comments outlined in Question 1 above.

2) Bulk Electric System Definition as listed in the posted Glossary is too broad for consideration and potentially could include everything regardless of how critical it may be to preventing a cascading blackout. NSPI strongly encourages a performance based definition or at least the adoption of similar language that presently appears in the NERC Planning Standards Document which states;
"The NERC Planning Standards, Measurements, and Guides in this report are intended to apply primarily to the bulk electric systems, also referred to as the interconnected transmission systems or networks. Because of the individual character of each of the Regions, it is recommended that each Region define those facilities that are to be included as its bulk electric systems or interconnected transmission systems for which application of the Planning Standards will be required. Any differences from the following Board definition of bulk electric system shall be documented and reported to the NERC Engineering Committee prior to the application or implementation of the Planning Standards in this report."
NSPI could support the posted Version 0 BES definition only with if it is prefaced by a statement similar to the above that the Regions may define what constitues their BES.

3) NSPI strongly agrees with the Version 0 drafting team's decision to remove the non-blackout related Phase III and Phase IV Planning Standards from the Version 0 Standards. If they are reintroduced, NSPI will be unable to recommend support for the Version 0 Standards. The Phase III and IV Blackout related standards can be developed by NERC in an expeditious manner within the process within a 6 month time period if they are proven necessary to ensuring the reliability of the BES. The remaining Phase III and IV Standards may go through the NERC RS Process on an "as needed" normal timeframe.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Regarding Standard 29-Policy 7
-NSPI recommends changing R1 to;
Each Reliability Authority, Transmission Operator, Balancing Authority, Transmission Owner, Generator Owner, Generator Operator and Load Serving Entity shall provide adequate and reliable telecommunications facilities internally and with others for the exchange of Interconnection and operating information necessary to maintain reliability. Where applicable, these facilities shall be redundant and diversely routed.
-and changing R2 – R5 from
"Each Reliability Authority, Transmission Operator, and Balancing Authority shall" To
"Each Reliability Authority, Transmission Operator, Balancing Authority, Transmission Owner, Generator Owner, Generator Operator and Load Serving Entity shall"
-Remove R6 and attachment 029-1 should be removed. Those procedures apply to NERCnet users, which is a small subset of community that R1 – R5 apply to. Also, these procedures are the steps for obtaining and using NERCnet. Those procedures should not be part of a Reliability Standard.

In many standards, the Compliance Monitoring Responsibility/role has been assigned to "Compliance Monitor" referred as "Unaffiliated Third Party". This role needs to be clarified and terminology be defined in the Version 0 glossary.

Version 0 Translations need additional work to address the initial requirement of ensuring that they are clear, well defined and measurable. Significant comments would need to be incorporated to meet this criteria. see our specific comments in other questions. We still maintain that the deletion of the "S" statements in the Planning Standards translation has resulted, in a few cases, the weakening of the Standard. NSPI suggests reinstating the language in the Purpose Statement.

There is a lack of a clear and consistent compliance process. While the standards and requirements are mentioned in all standards, yet in many of the standards the associated Measures, Compliance Monitoring Process and Levels of Non Compliance are missing or not specified. For the purposes of effective implementation/enforcement of these standards, we recommended that the associated measures, compliance monitoring process and levels of non compliance should also be (a) simultaneously mapped/specified where these exist already and (b) specifed/addressed in the very near future, where these do not exist today for consistency.

There still appear to be a few duplications or redundancy of requirements. There is a need to improvement to reduce these redundancies and better group the requirements.
As an example a few standards that show duplications are identified below:
(i) Standard 007 Requirement 5 and Standard 021 Requirement
(ii) Standard 008 Requirement and Standard 021 Requirement

In few standards the levels of non-compliance have not been translated/mapped correctly. As an example, in standard 028 levels of non-compliance have been incorrectly mapped from P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility). (re: more examples: std 028, 025, 027, 031) In general, lack of consistency for the compliance monitoring components is a problem. Some of the standards have compliance levels defined and some do not. There should be consistency.

ATC/CBM related planning standards contain business related issues and should be forwarded to the NAESB as noted in Question 6.

NSPI also stongly suggests that NERC revisit the Functional Model BOT approved Version 2 and address the comments submitted by industry during its posting to revise it and develop a Version 3. This should be undertaken immediately.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Peter Burke [on behalf of Jason Shaver, Hari Singh and other ATC employees]**	
Organization:	**American Transmission Company**	
Telephone:	**262-506-6863**	
Email:	**PBurke@atcllc.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

We are agreeing with dropping the listed planning standards from Version 0 at this time by recognizing that
(1) the translation process constraints on the SDT for Version 0 standards do not allow modifications to existing requirements and measures,
(2) the Version 0 standards are on an accelerated schedule for approval, adoption and implementation by April 1, 2005, and
(3) the SDT intends to recommend that many of these standards should be entered into the standards development process as Urgent Action SARs separate from Version 0.

However, we are troubled with the prospect of "losing" some of these standards (e.g. 059, 064, 065) during the time period that they are reviewed, refined and adopted in the next version. While we agree that compliance-enforceable standards should have passed the rigor of field-testing, many of the dropped 'incomplete' or 'not validated' standards do qualify, at the very least, as best-practices for the industry. In fact, some RRC's were already monitoring compliance with some of these dropped standards (065, 070 in MAIN). We are concerned that an inadvertent consequence of omitting these standards from Version 0 (which will supplant the existing Planning Standards) is that they will no longer be available as industry guides for desirable practices or requirements. This is regrettable since, as noted by the SDT, several of these standards are needed to support the NERC blackout recommendations.

We strongly support and encourage Urgent Action SARs for expeditious review, development and adoption of the following planning standards:
57.2--57.4 (was I.F. System Adequacy & Security -- Disturbance Monitoring M2-M4)
64.1--64.2 (was I.D. System Adequacy & Security -- Voltage Support & Reactive Power M1-M2)
65.1--65.12 (was III.C. System Protection & Control -- Generation M1-M12)
70.2--70.3 (was IV.A. System Restoration -- System Blackstart Capability M2-M3)
59.1--59.6 (was II.B. System Modeling Data -- Generation Equipment M1-M6)

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

054.1 involves calculation methodology and is therefore reliability related.
054.2 and 054.3 are procedure oriented and therefore good candidates for NAESB business practices.

Further, we suggest changing the description of 054.2 to "Procedure for Verifying Total Transfer Capability and Available Transfer Capability Calculations and Results" in order to be consistent with the description of similar standards 055.2 and 056.2.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
055.1 involves calculation methodology and is therefore reliability related.
055.2, 055.3 and 055.4 are procedure oriented and therefore good candidates for NAESB business practices.

Further, we suggest changing the description of 055.2 to "Procedure for Verifying Capacity Benefit Margin Calculations and Results" to better reflect the intended purpose.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
056.1 involves calculation methodology and is therefore reliability related.
056.2 is procedure oriented and therefore good candidate for NAESB business practice.

Further, we suggest changing the description of 056.2 to "Procedure for Verifying Transmission Reliability Margin Calculations and Results" to better reflect the intended purpose.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☒ Yes.

☐ No.

Comments

We give limited support to this addition. Considering that bulk power system (MMWG) planning models now tend to include significant number of lower voltage facilities, which are typically owned by the distribution provider, their accurate facility ratings are desirable. However, bulk power system reliability is not compromised by radial facilities; therefore, Standard 060 should only apply to the networked system facilities of distribution providers that are included in the planning models.

It appears that this intended addition is inadvertently missing from the Draft 2 version of Std. 060.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
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Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
Changing to the new numbering scheme at this stage will be more confusing than helpful.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments
Improvements to Planning Standards as per comments to Questions 5-7

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
No

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
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NERC Region		**Registered Ballot Body Segment**
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Group Comments (Complete this page if comments are from a group.)

Group Name: **National Grid Companies**

Lead Contact: Peter Lebro

Contact Organization: National Grid USA

Contact Segment: 1

Contact Telephone: 315-428-3434

Contact Email: peter.lebro@us.ngrid.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Tim Gallagher	GridAmerica LLC - ITC	NA	

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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☒ Agree.

☐ Disagree.

Comments
See comments separately filed by NPCC.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
See comments separately filed by NPCC.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

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Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments
See comments separately filed by NPCC.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

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Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

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Comments
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Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

See comments separately filed by NPCC.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
See comments separately filed by NPCC.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
See comments separately filed by NPCC.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments
Refer to comments separately filed by NPCC.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
No Response	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

National Grid USA would not approve the Version 0 Standards if any of the "show stoppers" listed in Question #11 of the NPCC response remain.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
See comments submitted by NPCC

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

National Grid USA would like to make the following recommendations to be considered when drafting the next draft of Version 0.

Standard 15: There should be a requirement on generators to provide the necessary data as there is a requirement on the PSE's (R6), a paragraph R7 should be inserted which reads 'Generation Operators shall provide information requested by their host Balancing Authority and Transmission Operators to enable them to conduct operational reliability assessments and coordinate reliable operations.'

Standard 16:R1, Standard 37:R4: In the standards it states outage data (generation and transmission) is only required to be submitted by noon of the day ahead, the emphasis should be on submitting the data as soon as it is known but no later that noon day ahead.

Standard 24:R3, R4, R5, R12, R17: Confidentiality of information should not be a factor when it comes to reliability – this needs to be addressed otherwise Companies may hide behind the confidentiality clause and not provide the data necessary to conduct operational reliability assessments and coordinate reliable operations.

All Standards where not already stated. The data retention periods should be clear for each standard – it is defined in some and not in others.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Chris de Graffenried**	
Organization:	**NY Power Authority**	
Telephone:	**(914)- 390-8134**	
Email:	**chris.degraffenried@nypa.gov**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*
Stanley Kopman	Northeast Power Coord. Council	NPCC	2
Ron Falsetti	The IMO (Ontario)	NPCC	2
Dave Little (also Representing)	New Brunswick Power	NPCC	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments

The Version 0 Draft 2 Reliabilty Standards should only designate ONE functional entity as being the highest level of authority, responsible for the "Reliability" of the BES. NPCC strongly suggests the designation used should be the "Reliability Coordinator" to reflect a direct translation of Policy 9. Although NPCC believes that RC is preferable for use in Version 0, we acknowledge the opinion expressed in the ORS/RCWG Letter and if utilization of the Reliability Authority, (RA) is preferred by industry we will support RA however we will continue to maintain only one Reliability designation should be associated with the Version 0 standards as having the highest authority-ultimate responsibility. The Operating Authorities as shown in the existing policies should be properly mapped to either RC, TO or BA as applicable to remove the RA designation.

The functional entity designated with "Reliability" must be the entity with the highest level of authority (ultimate responsibility for) that will act in the interests of reliability for the overall Reliability Coordinator Area "wide area" and the Interconnection

Other sub-entities within a contiguous RC Area may have reliability roles that are specific to a local Area and reportable to the RC. These sub-entities should not have a "Reliability" designation in their title, to avoid confusion during this transitional phase to the Functional Model.

NPCC strongly suggests the existing "Reliability Coordinators ", as designated by the Regions in their respective Reliability Plans, should be the only entities allowed to register as the Version Zero reliability entity, RC.

Any requirements assigned to a Reliability Authority should be divided among the other functional model entities i.e. TO, BA, RC.

NPCC would also like to remind the drafting team that the NERC BOT has stated that the Version 0 Standards must be FULLY implementable along with the associated industry full compliance in February 2005. Full implementation of the Functional Model and designating two entities as having the highest level of authority, as indicated in the posted Glossary, will not only lead to confusion but also not be clearly implementable with clearly defined responsibilities.

NPCC also notes that the Version 0 standards effort should provide valuable input to the review and update of the FM and ultimate full implementation and urges NERC to make this a top priority. The comments submitted to the existing Version 2 BOT approved FM should be evaluated immediately, revisions made, and the FM Version 3 drafted for approval. This, along with the Version 0 Standards, should be NERC's top priority as all the Version 1 Standards will utilize the FM designations.

NPCC believes that this response is full aligned with, and fully supports the more detailed position paper presented by The IMO on the RC/RA issue.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

See comments in Question 1 above. As per our position stated in Q1 above, the RA requirements may be reassigned to either Transmission Operator, Balancing Authority or applicable entities, as appropriate or previously identified in version 1.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Alternative B is the preferred approach and its application shall result in positive impacts on reliability, however NPCC believes that this might be beyond the scope of the drafting team and results in more than a translation. NPCC further suggests that if this represents an impediment to the approval of the Version 0 Standards then Alternative A would be acceptable. This other alternative would allow the work done to date by the Interchange Subcommittee, IS, to develop into a Version 1 SAR/Standard.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

NPCC participating members feel this suggestion is outside of the scope of what the Version 0 Drafting Team was charged to do. The Operating Policies were to be a direct translation and there were to be no requirements added as a result of this translation. We support retaining these as "guides," for the present and recommend their ultimate consideration and incorporation into the Version 1 standard.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

NPCC's participating members agree with the decision of the Version 0 Drafting team to remove these from the Version 0 Draft 2 package. Furthermore, NPCC reiterates its position that these standards have not gone through the entire field testing –revision process or the pilot program. Comments submitted were not addressed nor is there a schedule to do so. These standards should now be subject to the full "ANSI approved" NERC Reliability Standards Development Process.

NPCC also would recommend that those Phase III and IV Standards that are related to Blackout Recommendation could be developed by NERC in an expeditious manner under the process and be completed in 6 months.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

NPCC believes in Standard 54 all the references to ATC should be removed and referred to NAESB and the Standard's requirements as it pertains to TTC should be retained. TTC is a reliability issue and is a value that insures the system is operated in a safe and reliable manner. TTC Standards should be retained to ensure everyone follows a minimum requirement. The other components, CBM, ATC, and TRM define how the Market will be managed to ensure the TTC is not violated.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
NPCC's participating members strongly believe that the 55.1, 55.2, 55.3, and 55.4 should be forwarded to NAESB for development into a business standard. The Capacity Benefit Margin is a commercial issue.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
NPCC's participating members strongly believe Standard 56 should be retained in the Version 0 Standard set as the TRM is utilized in the development of operating limits.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments
It appears that the question being posed is incorrect. There is no mention of "Distribution Provider" in standard -060 (Facility Ratings).

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
RA	☒ Delete ☐ Add ☐ Modify	**(NPCC feels that only RC should appear in these Version 0 standards)**
BES	☐ Delete ☐ Add ☒ Modify	**The definition of BES as posted in the Glossary is too broad-based and all encompassing. NPCC makes a suggestion in Question 11-**
RC	☐ Delete ☐ Add ☒ Modify	**Definition of the RC should be identical to that which appears in Policy 9.**
RA Area	☐ Delete ☐ Add ☒ Modify	**This term should be modified to reflect the RC Area**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

NPCC's participating members believe that the proposed numbering, although it may be sufficient to satisfy all the future needs, should not be applied at this time. There is opportunity to group and rename/renumber the standards after they are approved by the BOT.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

NPCC would vote not to approve and recommend our member systems not to approve the Version 0 Draft 2 Standards based on the "showstoppers" listed in Question 11.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
Ranked in order of importance;

1) RC-RA Issue and Functional Model- NPCC participating members strongly believe there should be only one highest level of authority and strongly recommends the Version 0 drafting team adopt the accurate translation of only the RC and its mapping into the Version 0 Standards. Introduction of the RA along with the RC adds confusion. For the purposes of Registration, NPCC agrees with the NERC RCWG and ORS that only existing RCs as designated by their respective Regional Reliability Plans should register as the highest level of authority. For more specifics please refer to our comments outlined in Question 1 above.

2) Bulk Electric System Definition as listed in the posted Glossary is too broad for consideration and potentially could include everything regardless of how critical it may be to preventing a cascading blackout. NPCC participating members strongly encourage a performance based definition or at least the adoption of similar language that presently appears in the NERC Planning Standards Document which states;
"The NERC Planning Standards, Measurements, and Guides in this report are intended to apply primarily to the bulk electric systems, also referred to as the interconnected transmission systems or networks. Because of the individual character of each of the Regions, it is recommended that each Region define those facilities that are to be included as its bulk electric systems or interconnected transmission systems for which application of the Planning Standards will be required. Any differences from the following Board definition of bulk electric system shall be documented and reported to the NERC Engineering Committee prior to the application or implementation of the Planning Standards in this report."
NPCC could support the posted Version 0 BES definition only with if it is prefaced by a statement similar to the above that the Regions may define what constitues their BES.

3) NPCC's participating members strongly agree with the Version 0 drafting team's decision to remove the non-blackout related Phase III and Phase IV Planning Standards from the Version 0 Standards. If they are reintroduced, NPCC's participating members will be unable to recommend support for the Version 0 Standards. The Phase III and IV Blackout related standards can be developed by NERC in an expeditious manner within the process within a 6 month time period if they are proven necessary to ensuring the reliability of the BES. The remaining Phase III and IV Standards may go through the NERC RS Process on an "as needed" normal timeframe.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Regarding Standard 29-Policy 7
-NPCC's participating members recommend changing R1 to;
Each Reliability Authority, Transmission Operator, Balancing Authority, Transmission Owner, Generator Owner, Generator Operator and Load Serving Entity shall provide adequate and reliable telecommunications facilities internally and with others for the exchange of Interconnection and operating information necessary to maintain reliability. Where applicable, these facilities shall be redundant and diversely routed.
-and changing R2 – R5 from
"Each Reliability Authority, Transmission Operator, and Balancing Authority shall" To
"Each Reliability Authority, Transmission Operator, Balancing Authority, Transmission Owner, Generator Owner, Generator Operator and Load Serving Entity shall"
-Remove R6 and attachment 029-1 should be removed. Those procedures apply to NERCnet users, which is a small subset of community that R1 – R5 apply to. Also, these procedures are the steps for obtaining and using NERCnet. Those procedures should not be part of a Reliability Standard.

In many standards, the Compliance Monitoring Responsibility/role has been assigned to "Compliance Monitor" referred as "Unaffiliated Third Party". This role needs to be clarified and terminology be defined in the Version 0 glossary.

Version 0 Translations need additional work to address the initial requirement of ensuring that they are clear, well defined and measurable. Significant comments would need to be incorporated to meet this criteria. see our specific comments in other questions. We still maintain that the deletion of the "S" statements in the Planning Standards translation has resulted, in a few cases, the weakening of the Standard. NPCC participating members suggest reinstating the language in the Purpose Statement.

In many cases still the references to few of existing policies are not mapped correctly within the new version 0 requirements. (we are facilitating NERC SDT in this matter by identifying such inconsistencies or needs of references). The specifics are mentioned in Q13 below.

A list of specific deficiencies and/or inconsistencies are outlined under the Q13-Table below. We are facilitating NERC SDT in this matter by identifying issues and presenting the associated resolutions. It is expected that our noted/listed concerns (re: under Q13 below) shall be addressed and corresponding improvements in version 0 reliability standards shall be made.

There is a lack of a clear and consistent compliance process. While the standards and requirements are mentioned in all standards, yet in many of the standards the associated Measures, Compliance Monitoring Process and Levels of Non Compliance are missing or not specified. For the purposes of effective implementation/enforcement of these standards, we recommended that the associated measures, compliance monitoring process and levels of non compliance should also be (a) simultaneously mapped/specified where these exist already and (b) specifed/addressed in the very near future, where these do not exist today for consistency.

There still appear to be a few duplications or redundancy of requirements. There is a need to improvement to reduce these redundancies and better group the requirements.
As an example a few standards that show duplications are identified below:
(i) Standard 007 Requirement 5 and Standard 021 Requirement
(ii) Standard 008 Requirement and Standard 021 Requirement

In few standards the levels of non-compliance have not been translated/mapped correctly. As an example, in standard 028 levels of non-compliance have been incorrectly mapped from P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility). (re: more examples: std 028, 025, 027, 031) In general, lack of consistency for the compliance monitoring components is a problem. Some of the standards have compliance levels defined and some do not. There should be consistency.

ATC/CBM/TRM related planning standards contain business related issues and should be forwarded to the NAESB as noted in Question 6.

NPCC's participating members also stongly suggest that NERC revisit the Functional Model BOT approved Version 2 and address the comments submitted by industry during its posting to revise it and develop a Version 3. This should be undertaken immediately.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
6.0	☒ R ☐ M Number 4.0	**Remove the wording "with like values but opposite signs" in order to make more clarity in R4.**
7.0	☒ R ☐ M Number 4.0	**(Also in R5) This needs to be clarified whether these requirements have to be fulfilled by both presently worded RA (i.e. new proposed terminology RC) and TO - "individually or jointly". It is not clear that who would be overall monitor. A more clear role needs to be identified in this standard. Also Reliability entity should be termed as 'RC'. Please see comments in Q1.**
8.0	☐ R ☐ M Number	**(In Purpose)The last sentence should be read as follows: Violations are also reported to the compliance monitor.**
8.0	☐ R ☒ M Number 1.0	**(Measure 1,2 and 3)a complex co-ordination/reporting mechanism requiring that both RA & TO informs/reports IROL/SOL violations to RC, RC then evaluates actions of RA & TO and provides directions to RA/TO to return system within limits. RA/TO to then take corrective actions as directed by RC. The fact is that following a contingency resulting in IROL violation the system has to be returned ASAP and/or within 30 minutes. -continued-**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	**The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in returning the system -ASAP, and in turn would create confusions thereby impacting reliability. There should only be one Reliability designation/entity i.e. RC. See our comments and position outlined in Q1 of NERC comment form re: use of one terminology RC only.**
9.0	☐ R ☐ M Number	**(Purpose)The last sentence be read as: "To ensure voltage levels, reactive flows, and reactive resources are monitored…….. in real time to protect equipment and to ensure/facilitate the reliable operation of the Interconnection"**
12.0	☒ R ☐ M Number 0.0	**Policy 3 B2 (Sharing Interchange schedule details via a secure network) should also be included as a requirement applicable to BA. As an example see standard 34-R3 for its inclusion in this standard as well.**
17.0	☒ R ☐ M Number 5	**R5 refers to neighboring TOs while other sections refer to affected TOs. There is a need to use the same phrase in all sections of standards for purposes of consistency. (in R6) Delete the word- all.**
17.0	☐ R ☐ M Number	**Many of the guides in Policy 4D are in fact criterion that are not included in this std. We are of the opinion that any critical/ criteria needs to incorporated in future via urgent SAR process. The remaining should be mapped into an version 0 accompanying Reference Document.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
18.0	☐ R ☐ M Number	**(Purpose)The statement should be read as follows: To ensure reliability entities have clear decision-making authority and capabilities to take appropriate actions or direct the actions of others to return the transmission system to normal conditions during an emergency.**
18.0	☒ R ☐ M Number 3.0	**In the sentence: "Under these circumstances the Transmission Operator or Generator Operator shall immediately inform the Reliability Coordinator, or Transmission Operator of the inability to perform the directive …" The use of "or" is confusing and may create ambiguity. The specific role of entity responsible for 'providing' and 'receiving' information needs to be clarified. Should this be combined responsibility applicable to all or for any?**
20.0	☒ R ☐ M Number 7.0	**R7(b) should be read as Deploying/utilizing all available operating reserve R7(f) should be read as Reducing/shedding load, …….**
20.0	☐ R ☐ M Number	**(Levels of non-compliance)It is not clear whether the term "plans" mentioned in Level 3 and Level 4 pertain to the requirements R1 to R10 of this standard or refer to plans prescribed in associated std-025. It appears that compliance items are not mapped as per applicable requirements.**
20.0	☐ R ☐ M Number	**(In Attachment 020-1(A-1))This is another example of confusions being created due to dual roles. Only 'RC' terminology should have been used, see our comments outlined in Q1 above. The requirements and sections of this standard outlines that EEA has to be issued by RC and the RA has to make request to RC to issue EEA. The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in issuing EEA's thereby impacting reliability.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
22.0	☐ R ☐ M Number	**(In Attachment 1 of 022-2)Incident No. 7 and footnote should be modified to reflect IROL and a new reference.**
26.0	☐ R ☐ M Number	**(In Purpose)The second line in this section should be read as: Transmission Operator operating with insufficient generation or transmission capacity shall have the capabilities and authority to shed load rather than risk …**
27.0	☐ R ☐ M Number	**(Levels of non-compliance)It appears that the levels of non-compliance refer to the elements outlined in Attachment 027-01. This needs to be clarified. Accordingly, the levels of non-compliance should include the revised wording with specific reference to remove any ambiguity. e.g. Level 1: Plan (elements of Attachment 027-01) exists but is not…**
28.0	☐ R ☐ M Number	**(In Purpose)The following wording is suggested: Each reliability entity shall have a plan to continue …**
28.0	☒ R ☐ M Number 1.0	**The term RC needs to be inserted into section of Applicability.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
28.0	☐ R ☐ M Number	**(Levels of non-compliance)The reference to Requirement R1 should be corrected to P6T3 instead of P6T2** **More important, the levels of non-compliance have been translated/mapped incorrectly from the P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility). The levels of non-compliance should be corrected by mapping/translating the levels from P6T3 not P6T2.**
29.0	☒ R ☐ M Number 1.0	**R1 excludes the transmission owner. "Other RA, TO and BA" should read "affected RC….". In R4 -the requirement needs to be expanded to the transmission owner as well.**
30.0	☐ R ☒ M Number 1.0	**Although the non-compliance regarding the interview verification items 1 and 2 have now been included in this draft (mapped from P8T1) yet the interview verification items 1 and 2 have not been mentioned/mapped (from P8T1) in this standard.**
31.0	☐ R ☐ M Number	**(Levels of non-compliance) "…. not completed Criterion b) of Requirement 1-1." shall be read instead of " … not completed Criterion 2 of Requirement 1." To be consistent with the standard.**
33.0	☐ R ☐ M Number	**The term "reliability entities" needs to be defined to remove ambiguity.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
34.0	☒ R ☐ M Number 1.0	**The last sentence should read "These communication facilities shall be staffed…" instead of "These communications shall be staffed…"**
35.0	☒ R ☐ M Number 2.0	**Reword to ”When a RELIABILITY COORDINATOR is aware of an operational concern, such as declining voltages, excessive reactive flows, or an IROL violation in a neighbouring RELIABILITY COORDINATOR, it shall contact the RELIABILITY COORDINATOR in whose RELIABILITY COORDINATOR AREA the operational concern was observed.”**
37.0	☒ R ☐ M Number 7.0	**The information system (RCIS) related terminology should be used.**
38.0	☒ R ☐ M Number 8.0	**The last sentence should read "The Reliability Coordinator shall disseminate such information within its Reliability Coordinator Area, AS NECESSARY.-In R12-The end of the first sentence should read "…Reliability Coordinators shall be aware of the impact of the operation OF THAT SPECIAL PROTECTION SYSTEM on inter-Area flows."-In R17-This requirement lacks clarity. It needs to be clarified that whether the word “limits” at the end of the last sentence refer to SOL or IROL or both?**
39.0	☒ R ☐ M Number 2.0	**For the purposes of clarity the R2 should read as follows: "A Reliability Coordinator experiencing a potential or actual SOL or IROL violation within its Reliability Coordinator Area shall, at its discretion, select from either a "local" (Regional, Interregional or subregional) or an Interconnection-wide transmission loading relief procedure."-In R6-"interchange scheduling standards" (referred to at the end of the sentence) needs to be clarified to reflect and reference to specific standard.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.0	☒ R ☐ M Number 1.0	**R1-1 Speaks about "planning" the system but does not speak about "designing" the system. We are of the opinion that the drafting team should consider the term are not synonymous and its inclusion in all 4 - 051 standards.- In M1-2-delete "none identified" at the end of the measure.**
53.0	☒ R ☐ M Number 1.0	**R1-1,Requires Transmission Owners to have and document facility connection requirement for Generation, Transmission and End-user facilities to ensure compliance with NERC, Regional standards, as well as power pool criteria…. The term "power pool" should be eliminated and replaced with appropriate FM terms, such as Transmission Operator.**
56.0	☒ R ☒ M Number	**"the Transmission System Providers and Transmission Owners …" shall be read instead of "and the transmission users …" to be consistent with the outlined purpose of this standard.-This also applies to 56.2**
61.7	☒ R ☐ M Number 2.1	**"… load management to Reliability Coordinators and Transmission Operator(s) on request ..." shall be read instead of "…load management to system operators and security center coordinators on request ..." to be consistent with the standard.**
63.2	☒ R ☐ M Number 2.1	**It is suggested to add "facilities" after "…that owns protection system(s)…." In R2-1 and R2-2.** **R2-1 and R2-2 define requirements for transmission, generation owners and Distribution providers, while Standard 053.1 refers to transmission, generation and End-use facilities. 053.2 goes on to infer End-use facilities are owned by Distribution providers and Load Serving Entities (LSE). But 063.2 excludes LSEs. Suggest the same entities be used consistently throughout.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
72.0	☐ R ☐ M Number	**Compliance Monitoring Process-The basic goal of reporting vegetation contact is to more quickly identify the proximity of growing vegetation to critical transmission, and the threat posed, and to further identify possible trends suggesting poor vegetation management on the part of a given TO. It is the opinion of the NPCC Task Force on Coordination of Operation that the above exceptions permitted in the current standard contradict the very intent of the vegetation reporting program-continued-**
	☐ R ☐ M Number	**and considerably weaken the effort.** **Such exceptions must not be permitted if the initiative is to succeed.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **MAAC**

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Steven Herling	PJM	MAAC	2
Stan Williams	PJM	MAAC	2
William Whitehead	PJM	MAAC	2
Kenneth Brown	PSE&G Co	MAAC	1
Jeffery Mueller	PSE&G Co	MAAC	1
Colin Loxley	PSE&G Co	MAAC	1
Thomas Piascik	PSEG Power	MAAC	5
James Hebson	PSEG ER & T	MAAC	6

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☒ Disagree.

Comments

Organizations that do not meet the responsibility/authority requirements of an RA should not register as RAs. NERC needs some organization to be in charge. Whoever has the required authority should register - it is not important whether the registered organization is a current RC or not. Standard were suppose to transition to assign responsibilities to those that can meet the respective reliability needs, standards were not suppose to grandfather organizations.

The proposed Standard 8 shows the danger of this proposal. Standard 8 requires that RAs tell the RC of violations [so that the RC can do its coordination!] The implication is that RC may not have the tools to monitor the composite system and must rely on decentralized reporting. The inherent delays in this process should be unacceptable. The Ver 0 compromise [RCs dependent on others for information [R1] and RA subject to being overridden [Requirement R4] provides a real loophole in operating the system and a potential for serious problems.

Standard 27 on Restoration is an RA function. Here it would seem that the wide-area coordination is most important yet the RAs do the work - No coordination is required until [R10.5] the RC is 'notofoed' of what is about to occur.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

The Version 0 Team must first define what it means by RC, RA and T-Operator, and where it intends to retain one or the other.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

The objective is to create clean crisp mandatory standards. The inclusion of Guides adds nothing but confusion to the Mandatory standards.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

These are business issues and do not belong to NERC.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☒ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☒ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Version 0 is quickly becoming an academic exercise. It should be completed as soon as possible so that real consensus-based publically-debated Relaibility Standards can be developed.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
No

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

The SDT should decide whether it wants an RA or T-Operator to be in charge. The ULTIMATE accountabilities, authorities, and responsibilities are too often given to multiple entities. This of course spreads the coverage but it does not provide the focus that the SDT was asked to provide. This is evidence thoughout Version 0 but specifically in Standards 7, 8, 14, 15, 16, 17, 24, 26,and 29.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
2.0	☐ R ☐ M Number	**Applicability: delete all references to Reserve Sharing Groups. The Functional Model assigns the responsibity of control on the BAs. BAs that agree to use RSGs may do so but that is HOW they have decided to handle DCS.**
2.0	☒ R ☐ M Number 1.1	**Delete Requirement. First it is unnecessarry (see above). Second it is not a mandate - the use of the word may makes it an option. Third a BA may choose any arrangement (not just RSGs) to meet its obligation and four (and most importantly, NERC cannot mandate that all RSG members have the same obligations and responsibilities. As written this Requirement would adversely impact the some Reserve sharing programs - those that help but do not obligate each member - the member is on the ho in the NE.**
3.0	☐ R ☒ M Number 1.0	**The measure is not connected to the requirements. The reqirements for Standard 3 all refer to Frequency Bias and Frequency Bias setting. The measure is to complete a Response Survey. A measure of Frequency Bias settings is to have a Bias setting. The fact that the requirement mandates a minimum setting (i.e a system with no response at all must have a FBS), makes the measurement of a system's response to an ad hoc event a meaningless exercise vis-à-vis the FBS.**
4.0	☒ R ☐ M Number 1.0	**The SDT has introduced a new requirement, i.e. that an RC must serve as the Time Monitor. The current standard requires only that a monitor be a Relability Authority not an RC.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
8.0	☒ R ☐ M Number 1.0	**This requirement or requirement 2 of Standard 15 would seem unnecessary. Standard 15 seems to provide the RC with all of the data necessary to do monitoring and analysis, yet this standard requires RA to inform the RC of overloads. Is this necessary?**
31.0	☒ R ☐ M Number 1.1	**Delete Item 'e' or make it more definitive - "…program to consider…" Consider does not connote mandatory.**
33.0	☐ R ☐ M Number	**Purpose - the stated purpose of this standard is to give the RC the authority to shed load. However, in standard 25 and 26 the RCs are not included. For example Standard 25 does not require RC to be certified and Standard 26 requires Load Shedding PLasns but only by the RAs.**
34.0	☒ R ☐ M Number 5.0	**The requirement is not measureable regarding "easily understood" or "Particular emphasis". Would suggest wording such as : "…provide information on alarm management and awareness, …."** **similarly with R7 - drop the word 'adequate'.**
36.0	☒ R ☐ M Number 3.0	**delete "extensive" ; and in R4 delete word 'particular' , and revise 'best available information' to "updated information"**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
37.0	☒ R ☐ M Number 2.0	**Change "pay particular attention to " to "monitor"**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
51.1	☒ R ☐ M Number 1.1	**Item c, the 8th bullet references Planned facilities for inclusion of studies. Does the SDT envision inclusion of all 'proposed' Planned facilities or do they envision just the ones under-constructuion? or do they envsion some other definition of planned facilities?**
51.1	☒ R ☐ M Number 1.2	**Item b is unclear. Suggest SDT rewrite sentence. Would suggest "Review (in subsequent annual assessments) the continuing need for the required facilities."**
51.1	☐ R ☒ M Number 1.1	**…evidence that …Compliance Monitor provided … should be changed to …evidence Compliance Monitor performed and devloped corrective plans**
51.2	☒ R ☐ M Number 2.1	**Item 'e' conflicts with the first bullet of Item 'c'. Either delete item or revise to : "All Categories of Contingencies (e.g. lines, transformers…)".**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.3	☒ R ☐ M Number 3.1	**Item 'e' revise to : "All Categories of Contingencies (e.g. lines, transformers…)".**
51.3	☒ R ☐ M Number 3.2	**Item 'b' is unclear. Revise to: Review (in subsequent annual assessments) the continuing need for required facilities.**
51.3	☐ R ☒ M Number 3.1	**…evidence that …Compliance Monitor provided … should be changed to …evidence Compliance Monitor performed and devloped corrective plans**
51.4	☒ R ☐ M Number 4.1	**Item 'd' revise to : "All Categories of Contingencies (e.g. lines, transformers…)".**
51.4	☐ R ☒ M Number	**Reword: "The Planning Authority and Transmission Planner shall provide evidence to its Compliance Monitor that it provided assessments for its system responses per Reliability Standard."**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
52.1	☒ R ☐ M Number 1.3	**4th bullet - drop words "Fuel supply and"; or define the phrase Fuel Adequacy. NERC does not have a measure or definition of Fuel Adequacy. Fuel storage is an economic decision. Little or no storage with continuous supplies is a normal condition. Who will decide if that is 'adequate'?**
52.1	☐ R ☒ M Number 1.1	**Delete "…other Regional Relaibility Organazations or …" First, measures should not introduce new requirements. There is no Requirement that permits one RRO to make a mandatory request of another RRO for any study.**
53.1	☒ R ☐ M Number	**Delete 53.1 Nothing in this standard relates to a NERC-level requirement. This standard is based on RRO setting the requirements but does nothing, from a NERC perspective, of defining whether those RRO requirements are good or bad. This standard punishes RROs for not providing NERC documentation of information that NERC doesn't do anything with nor has a measure for.**
53.2	☐ R ☒ M Number 2.1	**The requirement does not refer to PA or TP anywhere, yet the measure imposes an obligation on both the PA and TP.**
53.2	☐ R ☒ M Number 2.2	**The requirement does not refer to PA or TP anywhere, yet the measure imposes an obligation on both the PA and TP.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
54.1	☒ R ☐ M Number 1.1	**Delete "in conjunction with its members". Membership and governance of the RROs is not subject to NERC's approval.**
54.1	☒ R ☐ M Number 1.1	**Item 'f' is unclear**
	☐ R ☐ M Number	
54.3	☐ R ☐ M Number	**Delete this standard. This is a business practice and should not be included as a relaibility standard.**
55.0	☐ R ☐ M Number	**PURPOSE: replace 'transmission system users' with 'transmission system operators'. Transmission users are not the ones that 'apply' CBM.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
55.0	☐ R ☐ M Number	**PURPOSE: delete paragragh " Regional Capacity Benefit Margin methodologies …. facilitate transactions." Facilitating transactions is a commercial issue not a reliability issue. Supplying data to Market participants is also a commercial obligation.**
55.1	☒ R ☐ M Number 1.1	**Delete "in conjunction with its members". Membership and governance of the RROs is not subject to NERC's approval.**
55.1	☒ R ☐ M Number 1.1	**Delete item 'a': "Specify that the method used … consistent with its generation planning criteria." How can this be a standard if neither NERC nor all of the RROs have generation planning criteria?**
55.2	☒ R ☐ M Number 1.1	**Item 'b' delete 'generation reliability requirent and associated' (see above)**
55.2	☒ R ☐ M Number 2.1	**Delete "in conjunction with its members". Membership and governance of the RROs is not subject to NERC's approval.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
55.2	☒ R ☐ M Number 2.1	**Item 'b' delete "to ensure that the most current CBM values are available to users." CBM is not made available to users.**
55.2	☒ R ☐ M Number 2.1	**Item 'c' delete last sentence "It is recognized …" It is an editorial comment and does not belong in a reliabilty standard.**
55.2	☒ R ☐ M Number 2.1	**Delete Item 'd' see Item 'b' comment**
55.2	☒ R ☐ M Number 2.2	**Reword: delete 'results of' . The RRO is not required to provide NERC with its values. NERC may ask for the RRO's REVIEW procedures. Reword sentence to read: "Each Regional Reliability Organization shall make documentation of its Capacity Benefit Margin Review procedure available to NERC on request (within 30 calendar days)."**
55.2	☒ R ☐ M Number 2.3	**Insert REVIEW beteen CBM and procedure. RRO's should provide NERC with how they, the RRO, will review CBM. Since NERC how no critieria for rating CBM, NERC has no need for the CBM procedure itself.** **Correct remaining sections that refer to procedure and change to Review Procedure.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
56.0	☐ R ☐ M Number	**PURPOSE: delete "…and the resulting transmission relaibility margin values" Data availability and posting is a Business and a FERC requirement, not a Planning or reliability issue.**
56.1	☒ R ☐ M Number 1.1	**Delete "in conjunction with its members". Membership and governance of the RROs is not subject to NERC's approval.**
56.2	☒ R ☐ M Number 2.1	**Item 'b' Delete "to ensure …values available to users."**
56.2	☒ R ☐ M Number 2.1	**Item 'c' delete last sentence "It is recognized …" It is an editorial comment and does not belong in a reliabilty standard.**
56.2	☒ R ☐ M Number 2.1	**Item 'd' delete - Margin values not provided to users.**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Kenneth A. Goldsmith**	
Organization:	**Alliant Energy**	
Telephone:	**319-786-4167**	
Email:	**kengoldsmith@alliantenergy.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☒ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Our primary concern with Alternative B is that the third bullet may allow the RC, RA or TO to wield more directives than they already do. We tend to be negatively impacted when flows are held or reduced. If possible, we think the third bullet should be dropped.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

We agree that the standard borders the line between reliability standards and business practices. We would not like to see parts of the standard broken out, as it is more effective and coherent as one package. As such, we would like to see it all as one and in the NERC Standards.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
We agree that the standard borders the line between reliability standards and business practices. We would not like to see parts of the standard broken out, as it is more effective and coherent as one package. As such, we would like to see it all as one and in the NERC Standards

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
We agree that the standard borders the line between reliability standards and business practices. We would not like to see parts of the standard broken out, as it is more effective and coherent as one package. As such, we would like to see it all as one and in the NERC Standards

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments

The Distribution Provider is typically monitored by by state regulatory bodies, but to the extent distribution providers own bulk facilities, they should, as a transmission owner, be required to comply with NERC standard 060.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

The industry is being asked to transition to the Reliability Standards, so let's get the new numbering scheme as well, so we can take care of it at one time.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☒ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
23.0	☐ R ☐ M Number	**There is no definition of sabotage. Suggest using the following definition; Sabotage means a verifiable deliberate act that is directed against a company's facilities or their portions of the interconnection that could directly or indirectly endanger public health or the reliability of the system.**
23.0	☒ R ☐ M Number 1.0	**It is almost impossible for us to be aware of all acts of actual or potential sabotage that could affect multi-sites with in the larger portions of the interconnection. This should be reduced to each entity's area of ownership**
72.0	☐ R ☒ M Number 1.2	**Please add the following: . . . annual work plan with supporting documentation maintained at a central location.**
	☐ R ☐ M Number	

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Kathleen Goodman**	
Organization:	**ISO New England Inc.**	
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Email:	**kgoodman@iso-ne.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☒	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

The Version 0 Draft 2 Reliabilty Standards should only designate ONE functional entity as being the highest level of authority, responsible for the "Reliability" of the BES. ISO-NE strongly suggests the designation used should be the "Reliability Coordinator" to reflect a direct translation of Policy 9. Although ISO-NE believes that RC is preferable for use in Version 0, we acknowledge the opinion expressed in the ORS/RCWG Letter and if utilization of the Reliability Authority (RA) is preferred by industry we will support RA, however, we will continue to maintain only one Reliability designation should be associated with the Version 0 standards as having the highest authority-ultimate responsibility. The Operating Authorities as shown in the existing policies should be properly mapped to either RC, TO or BA as applicable to remove the RA designation.

The functional entity designated with "Reliability" must be the entity with the highest level of authority (ultimate responsibility for) that will act in the interests of reliability for the overall Reliability Coordinator Area "wide area" and the Interconnection. Other sub-entities within a contiguous RC Area may have reliability roles that are specific to a local Area and reportable to the RC. These sub-entities should not have a "Reliability" designation in their title, to avoid confusion during this transitional phase to the Functional Model.

ISO-NE strongly suggests the existing "Reliability Coordinators, " as designated by the Regions in their respective Reliability Plans, should be the only entities allowed to register as the Version Zero reliability entity, RC.

Any requirements assigned to a Reliability Authority should be divided among the other functional model entities i.e. TO, BA, RC.

ISO-NE would also like to remind the drafting team that the NERC BOT has stated that the Version 0 Standards must be FULLY implementable and self explanatory such that the industry can certify its compliance in February 2005. Full implementation of the Functional Model and designating two entities as having the highest level of authority, as indicated in the posted Glossary, will not only lead to confusion but also not be clearly implementable with clearly defined responsibilities.

ISO-NE also notes that the Version 0 standards effort should provide valuable input to the review and update of the Functional Model and ultimate full implementation and urges NERC to make this a top priority. The comments submitted to the existing Version 2 BOT approved Functional Model should be evaluated immediately, revisions made, and Version 3 drafted for comment/approval. This, along with the Version 0 Standards, should be NERC's top priority as all the Version 1 Standards will utilize the Functional Model designations.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

See comments in Question 1 above. As per our position stated in Q1 above, the RA requirements may be reassigned to either Transmission Operator, Balancing Authority or applicable entities, as appropriate or previously identified in version 1.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

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R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

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R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Alternative B is the preferred approach and its application shall result in positive impacts on reliability, however ISO-NE believes that this might be beyond the scope of the drafting team and results in more than a translation. Therefore, we further suggest that if this represents an impediment to the approval of the Version 0 Standards then Alternative A would be acceptable.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

ISO-NE believes this suggestion is outside of the scope of what the Version 0 Drafting Team was charged to do. The Operating Policies were to be a direct translation and there were to be no requirements added as a result of this translation. We support retaining these as "guides," for the present and recommend their ultimate consideration and incorporation into the Version 1 standard.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

ISO-NE agrees with the decision of the Version 0 Drafting Team to remove these from the Version 0 Draft 2 package. Furthermore, we would like to reiterate our position that these standards have not gone through the entire field testing –revision process or the pilot program for compliance implementation. Comments submitted for Phase III templates were not addressed nor is there a schedule to do so. These standards should now be subject to the full "ANSI approved" NERC Reliability Standards Development Process.

ISO-NE also recommends that those Phase III and IV Standards that are related to Blackout Recommendation be developed by NERC in an expeditious manner under the process and be completed in 6 months.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

ISO-NE believes in Standard 54 all the references to ATC should be removed and referred to NAESB and the Standard's requirements as it pertains to TTC should be retained. TTC is a reliability issue and is a value that insures the system is operated in a safe and reliable manner. TTC Standards should be retained to ensure everyone follows a minimum requirement.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
RA	☒ Delete ☐ Add ☐ Modify	**only RC should appear in these Version 0 standards**
BES	☐ Delete ☐ Add ☒ Modify	**The definition of BES as posted in the Glossary is too broad. ISO-NE requests that the Drafting Team use the definition as proposed in the Draft Legislation.**
RC	☐ Delete ☐ Add ☒ Modify	**Definition of the RC should be identical to that which appears in Policy 9.**
RA Area	☐ Delete ☐ Add ☒ Modify	**This term should be modified to reflect the RC Area**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

ISO-NE's believes that the proposed numbering, although it may be sufficient to satisfy all the future needs, should not be applied at this time. There is opportunity to group and rename/renumber the standards after they are approved by the BOT.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

ISO-NE would vote not to approve the Version 0 Draft 2 Standards based on the "showstoppers" listed in Question 11.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
Ranked in order of importance;

1) RC-RA Issue and Functional Model - ISO-NE strongly believes there should be only one highest level of authority and strongly recommends the Version 0 drafting team adopt the accurate translation of only the RC and its mapping into the Version 0 Standards. Introduction of the RA along with the RC adds confusion. For the purposes of Registration, we agree with the NERC RCWG and ORS that only existing RCs, as designated by their respective Regional Reliability Plans, should register as the highest level of authority. For more specifics please refer to our comments outlined in Question 1 above.

2) Bulk Electric System Definition - as listed in the posted Glossary is too broad for consideration and potentially could include everything regardless of how critical it may be to preventing a cascading blackout. ISO-NE strongly encourages a performance based definition or at least the adoption of similar language to that presently proposed in the Draft Electric Reliability Bill.

3) Flawed Registration Process - The proposed registration process under the Version 0 standards encourages any entity that wants to register for a particular function to do so. This invites the possibility of multiple entities registering as the Reliability Coordinator, Transmission Operator, or Balancing Authority, without regard to their capabilities or contractual arrangements. We believe that the registration process should be tightly controlled by the NERC Regions to ensure that no overlapping registrations or conflicts over control occur that could undermine the efforts to identify and adhere to clear and crisp reliability standards. The registration effort under the auspices of the region should also ensure that all Areas of the Interconnection are covered with no overlap or gaps in authority.

4) Undefined "Operating Limit" - There are no clearly defined industry definitions of what constitutes an “Operating Limit” and when the violation of that “Operating Limit” becomes a reportable incident. The Version 0 standards must clearly describe what constitutes an “Operating Limit” and an “Operating Limit Violation,” as well as when that violation becomes reportable to NERC and the relevant Region. In describing these limits, the standards should include very clear examples for voltage, stability and thermal limits, including whether violations occur solely due to actual overloads or if a potential overload based upon contingency analysis is sufficient to trigger a violation.

5) Immature Phase III and IV Compliance Standards - ISO-NE strongly agrees with the Version 0 drafting team's decision to remove the non-blackout related Phase III and Phase IV Planning Standards from the Version 0 Standards. If they are reintroduced, we may unable to support adoption of the Version 0 Standards. The Phase III and IV Blackout related standards can be developed by NERC in an expeditious manner within the process within a 6 month time period if they are proven necessary to ensuring the reliability of the BES. The remaining Phase III and IV Standards may go through the NERC RS Process on an "as needed" normal timeframe.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

In many standards, the Compliance Monitoring Responsibility/role has been assigned to "Compliance Monitor" referred as "Unaffiliated Third Party". This role needs to be clarified and terminology be defined in the Version 0 glossary.

Version 0 Translations need additional work to address the initial requirement of ensuring that they are clear, well defined and measurable. Significant comments would need to be incorporated to meet this criteria. see our specific comments in other questions. We still maintain that the deletion of the "S" statements in the Planning Standards translation has resulted, in a few cases, the weakening of the Standard. NPCC participating members suggest reinstating the language in the Purpose Statement.

We also stongly suggest that NERC revisit the Functional Model BOT approved Version 2 and address the comments submitted by industry during its posting to revise it and develop a Version 3. This should be undertaken immediately.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Kirit S. Shah**	
Organization:	**Ameren Services**	
Telephone:	**314-554-3542**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☒ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
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Lead Contact:

Contact Organization:

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Contact Telephone:

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☐ Agree.

☐ Disagree.

Comments

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Comments

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Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

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- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
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Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

The "incomplete" Phase III and Phase IV standards should be retained separately from Version 0. They can be processed through an urgent action SAR or a similar accelerated process. This process should consider all the industry comments received to date, and also the Phase IV standards should be implemented only after field testing is completed at least once.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Reliability should take precedence over business reasons.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

These standards should be applied to the transmission system only. However, the transmission owners and/or provider should follow definition of the transmission system consistent with their regulatory filings.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

The Version 0 standards team should consider and incorporate appropriate comments provided by the industry prior to sending them out for approval.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Standard 051 (applies to Standards 051.1, 051.2, 051.3, 051.4)

1. It is assumed that the term "critical system conditions" applies to the season of the year and assumed load level (peak, minimum, etc.), and not the state of the transmission system. The latter assumption would be particularly contradictory for Standard 051.1 which is to consider the system with no contingencies.

2. The requirements of the standards refer to "all demand levels over a range of forecast system demands", yet the detailed bullet mentions that the studies should "be performed for selected demand levels". While we agree that studies are not necessary for all demand levels, more than a single demand level is required for assessment to adequately demonstrate that the load range is covered. This idea needs to be included for clarity.

3. Having all projected firm transfers modeled may not be practical to achieve in a single shapshot of a powerflow model. The requirement should allow engineering judgment to determine the appropriate level of system utilization to assess reliability considering all projected firm uses. We assume that the phrase "firm transfers" in the Standards refers to both capacity-backed transactions as well as transmission service reservations. Traditionally, capacity-backed transaction values are supported by contracts and are agreed to between entities prior to the development of the powerflow models. Transmission service reservations are more volatile and may be firm on one system, but not on another. Reservations may have been secured for reasons other than to support capacity transactions, they may be held for other specific system needs or as options to meet dynamic market conditions. Because of the nature of the transmission service reservations, it is inappropriate to model all firm transmission service reservations at the same time, as these reservations will not all go to schedule at the same time. For example, some generators have reserved 100% of their plant output in multiple directions to provide for flexibility to deliver to more than one customer or direction, but not more than 100% of the full plant output at the same time. Vertically integrated utilities have reservations going out as well as coming in, to provide for both export opportunities for their generation and to cover import conditions to ensure reliability to their load. Blindly including all transmission reservations in the powerflow models (in, out, and through) would overstate the loading on key facilities in some areas or introduce counterflow, which would understate and mask the loading problems on key facilities in other areas. It is also very difficult to model and glean meaningful results. Therefore, it is suggested that reservations be reviewed for "polarity", as they can increase or decrease the loading on key facilities. Including the word "projected" in the detailed bullet allows some amount of engineering judgment and subjectivity to enter into the modeling assumptions, but this idea needs to be expanded to ensure that they are applied consistently throughout the industry. More than one set of reservations needs to be reviewed to adequately consider the impact of transmission service reservations.

4. Entities (Transmission Providers) responsible for selling/allocating/approving transmission service need to include in their assessments the issues described in item number 3 above to ensure that the transmission system is not oversubscribed and that there are no reliability concerns associated with existing and future transmission service sales. Granting more firm transmission service assuming conterflow will be there would degrade system reliability.

Standard 051.2

1. From the description in R2-1 and Category B of Table I (column 2), it is specified that the elements to consider for contingencies include generators, transmission circuits, and transformers only. Circuit breakers by themselves are not included in this list of elements. Therefore, the outage of a single terminal or opening of a single circuit breaker of a multi-terminal transmission circuit should be an invalid outage and this standard should clearly state this.

2. Generation runback and redispatch should not be allowed to meet the performance criteria of this standard (single contingency). If generation runback is allowed, this runback amount should not be considered as "firm".

3. Regarding R2-1c) bullet 12, maintenance outages are granted in the operating horizon considering the expected demand level, generator dispatch, transmission facilities out of service, and transmission flow patterns, which should be part of a very near-term system assessment and not a longer-term planning assessment. How is this different than the Standard 051.3 assessment which is also supposed to cover all demand levels and multiple contingencies?

Standard 051.3

1. In the last sentence of the paragraph R3-1, the word "maybe" should be replaced with "may be".

2. see item #3 above for Standard 051.2

3. Is it the intent of the Standard that Category C and D contingencies of Table I should be considered along with facilities out of service for maintenance at lower system demand levels? We believe that the system does not necessarily have to be designed to support multiple outages, at some prescribed off-peak load level, because maintenance outages can be be rescheduled to permit the outage at lower off-peak load levels with acceptable system performance. This rescheduling may also allow for additional thermal capability that may be available at off-peak times.

Standard 051.4

1. In the last sentence of the paragraph R4-1, the word "maybe" should be replaced with "may be".

2. see item #3 above for Standard 051.3

Standard 060

1. In Standard 060.1-The term Methodology(s) should be replaced by Methodology(ies). Under Level of Non-Compliance five elements (1-5) should be replaced by five elements (a-e).

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.1	☒ R ☐ M Number	**see comments in response to question 12**
51.2	☒ R ☐ M Number	**see comments in response to question 12**
51.3	☒ R ☐ M Number	**see comments in response to question 12**
51.4	☒ R ☐ M Number	**see comments in response to question 12**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.2	☒ R ☐ M Number	**see comments in response to question 12**
60.1	☒ R ☐ M Number	**see comments in response to question 12**
57.0	☐ R ☐ M Number	**The guides section has been eliminated. These guides contain many critical items as stated in the black-out recommendations, such as the need for time synchronization and coordination with neighboring regions.**
63.0	☒ R ☒ M Number	**It is recommended that the old section III Discussion section remain. It also recommended that the Introduction, Standard S1 and S2, and Measurements M1 and M2 from the old standard be carried over to the new standard 63. The guides section has been eliminated. These guides contain many critical items as stated in the black-out recommendations, such as restricted use of zone-3 relays and coordination with neighboring utility systems.**
65.0	☐ R ☒ M Number	**Section M4 from the old standard, which required generator owners to provide operating characteristics of their generating equipment or protective relay or controls was not carried over. The guides section has been eliminated. These guides contain many critical items as stated in the black-out recommendations. These guides should be maintained as explanation of "good utility practice" in many of our parallel operating agreements.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
56.2	☒ R ☐ M Number 2.2	**Insert REVIEW Procedure in both R2.2 and R 2.3 see similar comments above**
58.4	☒ R ☐ M Number 4.1	**Item 'c' delete "as a function of frequency and voltage" Not everyone has this and there is no NERC standard for such characteristics.**
61.6	☐ R ☒ M Number 6.1	**The Level 4 non-compliance seems a bit harsh (as compared to other Level 4's) for not having some data.**
63.1	☒ R ☐ M Number 1.1	**Change 'monitoring' to 'reporting'. It would be dificult to monitor all facilities, the SDT could expect reporting of events.** **Also for R1.1 item 'a'; Measure 1.1**
69.2	☒ R ☐ M Number 2.1	**Should NERC be requireing the creation of Databases?**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Rebecca Berdahl**	
Organization:	**Bonneville Power Administration - Power Business Line**	
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Email:	**rmberdahl@bpa.gov**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☒ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☒	5 - Electric Generators
	☒	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **Bonneville Power Administration**

Lead Contact: Rebecca Berdahl and Deanna Phillips

Contact Organization: Bonneville Power Business Line - Power Business Line

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Additional Member Name	Additional Member Organization	Region*	Segment*
Marv Landauer	BPA-Corporate	WECC	1
Deanna Phillips	BPA - Power Business Line	WECC	5
Paul Arnold	BPA - Transmission Business Line	WECC	1
Bart McManus	BPA - Transmission Business Line	WECC	1
Tracy Edwards	BPA - Transmission Business Line	WECC	1
Kathy Craig	BPA - Power Business Line	WECC	5
Rebecca Berdahl	BPA - Power Business Line	WECC	6
Brenda Anderson	BPA - Power Business Line	WECC	5

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

As presented, the Bonneville Power Adminsitration (BPA) supports the decision to reassign current Reliability Coordinator responsibilities to the Reliability Authority when the NERC Functional model is implemented. .

Gerry Cauley very clearly expressed the dilemna that the drafting team faces with partial implemenetation of the functional model in The Request to Register Entities Responsible for Implementing Version 0 Standards. The Reliabilaity Coordinators are clearly not the only Reliability Authorities in existence. Their authority comes through delegation by the existing Control Areas, usually by means of a clearly defined operating agreement. The control areas continue to have first line responsibility for reliability. The Reliability Coordinators, who have an extensive wide-area view, are authorized to issue directives. Those directives are issued to the control areas, which implement the directives. This arrangement can not be overridden by rushing to implement the functional model, nor is it necessary to do so. 7

BPA further advises the Drafting Team if the decision is made not to reassign these responsibilities, BPA believes such action would be a show stopper.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

As the version 0 standards near completion, a matrix of which standards apply to each function should be developed. Experience with the standards and compliance monitoring can provide future direction on how to modify the standards and if necessary, the functional model.

BPA further advises the Drafting Team if the decision is made to apply all transmission system responsibilitieis to the Transmission Operator in Version 0 and defer implementation of the Reliability Authority into the future BPA believes such action would be a show stopper.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Alternative B will capture both small and large dynamic transfer transactions by changing from a straight 25% deviation to a 25 MW per hour devliation for transaction up to 250 MW and a 10% deviation for transactions greater that 250MW

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
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- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☒ Do not agree with dropping these planning standards from Version 0.

Comments

Removal of some of the standards that were listed in the August 14 Blackout Recommendations as possible violations is unacceptable. Old Planning Standards I.D.S1; II.B.S1 and S2; and 3.C.S1 and S2 were listed as possible standards violations that contributed to the Blackout. These standards must be included in the Version 0 standards. Waiting for a Urgent action SAR to rememdy the issues that came up in field testing and having no standard is in place in the meantime is not acting responsibly. This is a show-stopper for approval of the Version 0 standards for BPA.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

Planning standards that exist in the current NERC Planning Standards document need to remain in place because they are inherent in the overall transfer capability of the bulk delivery system which must employ consistent reliability methods pertainent to specific operating areas.

OASIS posting of the regional and transmission owner/operator methods used to determine the values of CBM, TRM, TTC and ATC. Buisness standard should require clarity and consistency in the documenting of explanations of each component of the specific entities ATC equation. For those transmission paths that are shared between two or more entities, the ATC documentation should also identify the transmission owner's rated allocation or percentage of transmission capacity ownership. Calculation of ATC, CBM and TRM should remain with the transmission owner/operator.

It should be noted that the Western Interconnection employs Operating Transfer Capability (OTC) which is comprable to the Total Transfer Capability (TTC) to declare bulk delivery system's seasonal, monthly and daily operating transfer capabilities. Calculation of TTC should employ a business standard that allows users of the system to participate in the models (load and generation) used to determine this numer as well as address the use of OTC by the Western Interconnection. If CBM is calculated, a business standard should be written to that addresses a calaborative process with the generation/resource providers from which the numer is derived.

It should be noted that the Western Interconnection employs the use of Nomograms which set the seasonal, monthly and daily OTC levels for the bulk delivery system. This replaces the Transmission Loading Relief methods used in the east. This distinction should be clear in the development of the business standards sited in the above paragraph.

NASEB business practices should be addressed/developed during the Version 1 timeframe.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
If CBM is calculated, a business standard should be written to that addresses a calaborative process with the generation/resource providers from which the numer is derived.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
It should be noted that the Western Interconnection employs Operating Transfer Capability (OTC) which is comprable to the Total Transfer Capability (TTC) to declare bulk delivery system's seasonal, monthly and daily operating transfer capabilities. Calculation of TTC should employ a business standard that allows users of the system to participate in the models (load and generation) used to determine this numer as well as address the use of OTC by the Western Interconnection.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments

NERC standards are to apply to the Bulk Transmission System. While there are issues with the definition of the Bulk Transmission System, some distribution systems interconnected to the Bulk Transmission System may have a negative impact on the operating transfer capability. A guide should be developed to address these specific situations to allow flexibility for local areas to address as determined by the local entities engaged in power delivery as exits in the language contained in paragraphs 3 and 4 of the NERC Planning Standards 'Forward' as written.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Unaffiliated Third Party	☐ Delete ☒ Add ☐ Modify	**Define**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Would approve Version 0 standards only if old standards I.D.S1; II.B.S1 and S2; and 3.C.S1 and S2 are included. IV.A.S1 and all measurements and additional work on the translation would also need to be included. Field testing of these standards should take place during Version 1 development.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

The elimination of old Standards I.D.S1; II.B.S1 and S2; III.C.S1 and S2; and IV.A and IV.B from Version 0 would cause BPA to vote against approval.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

The introduction in each of the original NERC Standards provided useful back ground information in applying the standards and should be retained as part of each standard. Perhaps include this in a Purpose statement in each standard.

The standards could be more succint by combining the requirement to prepare and submit under one requirement instead of two. This appear throughout the standards. For example, see standard 058.1 R1-1 and R1-2.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.4	☒ R ☐ M Number -41.0	**In Requirement R4-1, the first paragraph of this new standard says to test a number of each of the extreme contingencies while the old standard says to evaluate only those that would produce the more severe system impacts (the first bullet in item c of this requirement has the correct wording). This language should be corrected to be consistent.**
58.5	☐ R ☒ M Number 5.1	**Measure M5-1 Measure should not be that the RRO has evidence that it contributed to the development of cases but rather that the cases are available and solved so that the measure matches the Compliance Levels.**
58.6	☐ R ☒ M Number -61.0	**Measure M6-1should not be that the RRO has evidence that it contributed to the development of the models but rather that the models are available and solved and included no errors so that the measure matches the Compliance Levels.**
60.1	☒ R ☐ M Number	**Requirement R1-1, item a should included the words -as applicable for each owner- after the words -the items listed-. Not all owners will have all the pieces of equipment listed.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
60.1	☒ R ☐ M Number	**Requirement R1-1 also includes the requirement for Generator owners to provide data. However the list does not include any generation equipment. Although information on the generation equipment is necessary, it is not included in the existing standard. This needed information should be flagged as missing for the Transmission Plan SAR 500 Team to address.**
51.0	☐ R ☐ M Number	**This also applies to all standards. The introduction in the original NERC Standards provided useful back ground information in applying the standard and should be retained.**
51.1	☒ R ☐ M Number	**The statement: Be supported by a current or past study and/or system simulation testing that . . . being assessed is confusing. The following is suggested as a replacement: Be supported by a current or past study that demonstrates compliance with Category A of Table 1 for the plan year being assessed.**
51.2	☒ R ☐ M Number	**The statement: "Be supported by a current or past study and/or system simulation testing that . . . being assessed," is confusing. The following is suggested as a replacement "Be supported by a current or past study that demonstrates compliance with Category B of Table 1 for the plan year being assessed."**
51.3	☒ R ☐ M Number	**The statement: "Be supported by a current or past study and/or system simulation testing that . . . being assessed," is confusing. The following is suggested as a replacement "Be supported by a current or past study that demonstrates compliance with Category C of Table 1 for the plan year being assessed."**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.4	☒ R ☐ M Number	**The statement: "Be supported by a current or past study and/or system simulation testing that . . . being assessed," is confusing. The following is suggested as a replacement "Be supported by a current or past study that demonstrates compliance with Category D of Table 1 for the plan year being assessed."**
53.2	☒ R ☐ M Number	**Replace the work "cooperated" with "coordinated".**
55.2	☒ R ☐ M Number	**It is not clear what documents should be provided and what is an entity supposed to do in complying with this standard.**
58.0	☐ R ☐ M Number	**Define whom the Responsible Entity is for providing the data. This appears to be a defined term, but it is not in the Glossary.**
63.0	☐ R ☐ M Number	**This is a standard that should not be changed - use the original language.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
70.1	☐ R ☐ M Number	**As written it is unclear what must be reported as a blackstart unit. For hydro generation facilities, the house unit at a hydro plant is the blackstart unit and not each unit at the faciltiy - this interpretation should be clarified in the Version 0 Standard.**
70.0	☐ R ☐ M Number	**All existing measurements in the original standards need to be included in the Version 0 document. Partial measurement compliance does not achieve industry compliance to the standard.** **Include the introduction language of the original NERC standards.** **Functional model entities need to include power pools.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Deborah M. Linke, Manager Power Resources Office**	
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Email:	**dlinke@do.usbr.gov**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☒ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☒	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

It would be useful to have a matrix of which standards apply to each function. This will be helpful to all entities involved in making sure that applicable standards are not overlooked as the transition is made to the Version 0.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

Version 0 are standards. Guides, since they are not enforceable, could be referenced and made available elsewhere.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☒ Do not agree with dropping these planning standards from Version 0.

Comments

Some of these standards were listed as possible causes of the August 14th blackout. We recommend retaining these standards in Version 0. If more clarification is needed, additional work can be done after adoption. Having no standard in place, given the length of time required even under the Urgent SAR process, could be risky.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments
These standards are focused on the reliability of the interconnected bulk power system and should remain so.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
End User	☐ Delete ☒ Add ☐ Modify	**Standard 053 refers to end-user and end-user facilities. Having a definition of end-user in the Golossary would be useful.**
Regional Reliability Organization	☐ Delete ☒ Add ☐ Modify	**A definition is needed for this term. Absent legislation, one approach might be to refer to one of the current NERC Regional Reliability Councils.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any "show stoppers" in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

We understand that Bonneville Power Administration has concerns about the exclusion of the Generation Providing Entities responsibility to assess and approve or deny tags in Policy 3. We share in those concerns and support their comments on this issue.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
60.1	☒ R ☐ M Number -11.0	**We suggest adding "as applicable for each owner" after "the items listed."**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

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DO: **Do** enter text only, with no formatting or styles added.
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Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**WECC Reliability Subcommittee**	
Organization:	**WECC**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☒ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☒	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **WECC Reliability Subcommittee**

Lead Contact: Jeffrey Miller

Contact Organization: California ISO

Contact Segment: 2

Contact Telephone: 916-351-4464

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Additional Member Name	Additional Member Organization	Region*	Segment*
Baj L. Agrawal	APS	WECC	1
Dan D. Klempel	BEPC	WECC	
Charles E. Matthews	BPAT	WECC	1
Rebecca Berdahl	BPAP	WECC	
James McCluskey	CEC	WECC	9
Paul Heyden	CALP	WECC	5
Ronald D. Schellberg	IPC	WECC	1
Mohammed J. Beshir	LDWP	WECC	
R. John Leland	NWMT	WECC	1
Ben Morris	PG&E	WECC	1
Michael Sidiropoulos	PAC	WECC	1
James D. Eden	PGE	WECC	4
Phil Park	BCTC	WECC	2
J. Chris Reese	PSE	WECC	
Brian K. Keel	SRP	WECC	
Craig Cameron	SMUD	WECC	4
Michael Ramirez	SPR	WECC	1
Mohan Kondragunta	SCE	WECC	1
Frank McElvain	TSGT	WECC	1
Leonard York	WALC	WECC	1
Robert L. Dintelman	WECC	WECC	2
Steve Rueckert	WECC	WECC	2

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

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SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

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☐ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

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☐ Alternative A – translate existing policy and correct any deficiency in a future version.

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Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

The I.D. Voltage Support and Reactive Power planning standard with the WECC additon is an significant standard for WECC. It is RS's recommendation that this should be a priority Urgent Action SAR.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections.

This standard should be deleted and not be part of the reliabiltiy standards. This should be covered or is covered by NAESB and FERC.

The reliability constraint should be that the calculation of the TTC must meet all of the reliability standards. 054.1 as currently drafted does not require meeting the reliability standards.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections.

This standard should be deleted and not be part of the reliabiltiy standards. This should be covered or is covered by NAESB and FERC.

Is there a requirement to maintain CBM? If this standard is retained, it should be made clear whether or not maintaining CBM is a requirement on NERC members.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections.

This standard should be deleted and not be part of the reliabiltiy standards. This should be covered by or is covered by NAESB and FERC.

Is there a requirement to maintain TRM? If this standard is retained, it should be made clear whether or not maintaining TRM is a requirement on NERC members.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
SPS	☐ Delete ☐ Add ☒ Modify	**For clarity, NERC should retain the existing definition. But if the new definition is kept, change "Also called Remedial Action Scheme" to a complete sentence.**
Unaffilated Third Party	☐ Delete ☒ Add ☐ Modify	**Need to define.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

The introduction in each of the original NERC Standards provided useful back ground information in applying the standards and should be retained as part of each standard. Perhaps this information could be included as a Purpose statement in each standard.

The standards could be more succint by combining the requirement to prepare and submit under one requirement instead of two. This appear throughout the standards. For example, see standard 058.1 R1-1 and R1-2.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.0	☐ R ☐ M Number	**All of the bulleted item under the 51.x standards should be located in on place.**
51.1	☒ R ☐ M Number	**The statement: Be supported by a current or past study and/or system simulation testing that . . . being assessed is confusing.** **The following is suggested as a replacement: Be supported by a current or past study that demonstrates compliance with Category A of Table 1 for the plan year being assessed.**
51	☐ R ☐ M Number	**The introduction in the original NERC Standards provided useful back ground information in applying the standard and should be retained. This comment would also apply to most of the other draft standards.**
51.2	☒ R ☐ M Number	**The statement: "Be supported by a current or past study and/or system simulation testing that . . . being assessed," is confusing.** **The following is suggested as a replacement "Be supported by a current or past study that demonstrates compliance with Category B of Table 1 for the plan year being assessed."**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.3	☒ R ☐ M Number	**The statement: "Be supported by a current or past study and/or system simulation testing that . . . being assessed," is confusing.** **The following is suggested as a replacement "Be supported by a current or past study that demonstrates compliance with Category C of Table 1 for the plan year being assessed."**
51.4	☒ R ☐ M Number	**The statement: "Be supported by a current or past study and/or system simulation testing that . . . being assessed," is confusing.** **The following is suggested as a replacement "Be supported by a current or past study that demonstrates compliance with Category D of Table 1 for the plan year being assessed."**
53.1	☒ R ☐ M Number	**If this standard is kept, R1-1 and R1-2 should be merged**
53.0	☒ R ☐ M Number	**This standard is not focused on interconnected transmission system reliability. Since this standard is covered by the FERC, NERC should not have this as a standard. Since this standard is not a reliability standard, RS recommends that this standard be dropped.**
53.2	☒ R ☐ M Number R2-1c	**Replace the work "cooperated" with "coordinated".**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
54.0	☐ R ☐ M Number	**The last sentence in the Purpose should be delete as it repeats previouly stated information.**
54.1	☒ R ☒ M Number	**This standard should be deleted and not be part of the reliabiltiy standards. This should be covered by NAESB and FERC.** **The reliability constraint should be that the calculation of the TTC must meet all of the reliability standards. 054.1 as it stands now does not require meeting the standards.**
54.2	☒ R ☒ M Number	**This standard should be deleted and not be part of the reliabiltiy standards. This should be covered by NAESB and FERC.** **The reliability constraint should be that the calculation of the TTC must meet all of the reliability standards. 054.2 as it stands now does not require meeting the standards.**
54.3	☒ R ☒ M Number	**This standard should be deleted and not be part of the reliabiltiy standards. This should be covered by NAESB and FERC.** **The reliability constraint should be that the calculation of the TTC must meet all of the reliability standards. 054.3 as it stands now does not require meeting the standards.**
55.2	☒ R ☐ M Number R2-3	**Need to clarify what documents should be provided and what is expected of an entity in complying with this standard.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.0	☒ R ☐ M Number	**Define whom the Responsible Entity is for providing the data. This appears to be a defined term, but it is not in the Glossary.**
58.0	☒ R ☐ M Number	**The term Interchange Transactions should be replaced with Interchange Schedule.**
63.0	☐ R ☐ M Number	**RS believes this is a standard that should not be changed. This standard has been translated very well and the confusing parts of the old standard have been resolved.**
63.0	☐ R ☒ M Number	**It does not appear that III.A.M2 was translated into the Version 0 standard.**
68.4	☒ R ☐ M Number 4.2	**The statement: shall provide documentation of the program and its implementation; should be replaced by: shall provide documentation of the maintenance and testing program and its implementation**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
69.1	☐ R ☐ M Number	**Suggest renaming title to Special Protection System REVIEW Procedure.**
69.1	☒ R ☒ M Number	**RS believes that only SPS with regional impact should have a review requirement.**
70.4	☐ R ☒ M Number 4.0	**As written it is unclear what must be reported as a blackstart unit. RS intreprets that a house unit at a hydro plant would be the blackstart unit and not each unit at the facility.**
61.0	☐ R ☐ M Number	**These requirements are not consistent with current reporting practices in the west. Entities report information to WECC and WECC reports to NERC. This standard would require the LSA, PA and RP each to report to several entities.**
61.7	☒ R ☐ M Number 7.1	**R7-1 and M7-1 are not consistent with respect to whom the data should be reported to. It appears that M7-1 is correct and R7-1 is in error.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
61.0	☒ R ☐ M Number 7.1	**Resource Planner should not be included in this requirement. RS does not see a need for this.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Larry Larson**	
Organization:	**Otter Tail Power Company**	
Telephone:	**218-739-8572**	
Email:	**llarson@otpco.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☒ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

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☒ Agree.

☐ Disagree.

Comments

NERC should clearly defining the roles RC and RA if they are going to coexist, even if only during a transition period. The functional model needs to be fixed.

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☐ Alternative A – translate existing policy and correct any deficiency in a future version.

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Comments
An implementation plan will be required to adopt Alternative B

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- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

OTP supports adding 57.2 back to Version 0. Given the August 14, 2003 Northeast Blackout, we believe that a requirement for Transmission Owners and Generator Owners to install Disturbance Monitoring Equipment in accordance with the RRO plan is important.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
Sections 055.1, 055.2, 055.3, and 055.4

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Operating Security Limit	☐ Delete ☒ Add ☐ Modify	**Used in Constrained Facility definition**
Contingency Reserve-Spinning	☐ Delete ☒ Add ☐ Modify	**Used in Contingency Reserve definition**
Contingency Reserve-Supplemental	☐ Delete ☒ Add ☐ Modify	**Used in Contingency Reserve definition**
GLDF	☐ Delete ☐ Add ☒ Modify	**Remove paranthetical expresions at the end**
IROL	☐ Delete ☐ Add ☒ Modify	**Capitalize the A in MVAr to be consistent with the IEEE standard. The A is for Ampere, a proper noun requiring capitalization.**
ERCOT	☐ Delete ☒ Add ☐ Modify	**Used in definition for Interconnection.**
TLR	☐ Delete ☒ Add ☐ Modify	**Used in TLR Log and Reallocation definitions**
Overlap Regulation Service	☐ Delete ☐ Add ☒ Modify	**Change AGC/ACE to ACE**
Reserve Sharing Group	☐ Delete ☐ Add ☒ Modify	**This definition needs to be made broader, i.e. not restricted to BAs, since the reserve sharing can be among Load Serving Entities as it is in MAPP.**
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Standard 2, R5 changes what constitutes a reportable disturbance. The new language states that a Reserve Sharing Group shall be considered in a Reportable Disturbance condition whenever a group member has experienced a Reportable Disturbance and calls for the activation of Contingency Reserves from one or more other group members. The existing policy states reportable disturbances are contingencies that are greater than or equal to 80% of the MOST levere single contingency loss. The current interpretation is that a reportable disturbance is 80% of the reserve sharing groups most severe single contingency loss and not 80% of the largest single contingency loss for each BA. This also appears to be in conflict with Measurement 1 which indicates the reportable disturbance is 80% of the reserve sharing group's largest contingency.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
1.0	☐ R ☐ M Number	**In the Process section the reset period fpr CPS2 states you will have 0 violations in a calender month. The requirement is to have 90% of the clock 10-minute periods without a violation. It is not likely that anyone will reset with this criteria. The reset criteria should be meeting the CPS2 requirement for one calendar month.**
1.0	☒ R ☐ M Number 3.0	**No measures associated with Requirement 3.**
1.0	☒ R ☐ M Number 4.0	**No Measures associated with Requirement 4.**
2.0	☒ R ☐ M Number 4.0	**Second paragraph is missing a close bracket.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
20.0	☐ R ☒ M Number 1.0	**Measures 1 and 2 are not in the exisiting Policy 5 and should be removed from standard 020.**
17.0	☐ R ☐ M Number	**Source reference should be Policy 4 - Section D, not Section B**
57.2	☐ R ☐ M Number	**OTP supports adding 57.2 back to Version 0. Given the August 14, 2003 Northeast Blackout, we believe that a requirement for Transmission Owners and Generator Owners to install Disturbance Monitoring Equipment in accordance with the RRO plan is important.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**D. Bryan Guy**	
Organization:	**Progress Energy Carolina, Inc. (Planning)**	
Telephone:	**919-546-4107**	
Email:	**bryan.guy@pgnmail.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☒ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments

Focus here is on Planning Standards. See comments on Operating Standards in other Progress Energy (Carolina & Florida) submittals for Draft 2 of Version 0.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Focus here is on Planning Standards. See comments on Operating Standards in other Progress Energy (Carolina & Florida) submittals for Draft 2 of Version 0.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Focus here is on Planning Standards. See comments on Operating Standards in other Progress Energy (Carolina & Florida) submittals for Draft 2 of Version 0.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

Focus here is on Planning Standards. See comments on Operating Standards in other Progress Energy (Carolina & Florida) submittals for Draft 2 of Version 0.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

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- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

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- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

On the basis that mid-stream through the Due Process underway for Phase III standards and prior to the beginning of the Due Process for Phase IV standards, changes in the industry interrupted finalization of these standards, therefore, all Phase III and IV NERC Planning Standards should be eliminated from Version 0. Any new standard in these areas should follow an open and complete development and review process prior to incorporation in the compliance program.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☒ Yes.

☐ No.

Comments
Simply stated the wording should be such that this standard applies if the entity owns transmission.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

Planning Standards in this Version 0 are near acceptable, pending improvements. Refer to operating comments on Question 1 from other submittals from Progress Energy (Carolina and Florida).

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

For Planning Standards no "show stoppers". However, for Operating Standards, please refer to responses to Question 1 from other Progress Energy (Carolina & Florida) submittals focusing on the change that took place in the use of the term Reliability Authority.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.1	☐ R ☒ M Number 2	**Remove ---None identified.---- At the end of M1-2 .**
51.4	☐ R ☒ M Number 2.0	**Measure should end with reference to 051.4-R4-2 not 051.4-R4-1 as printed.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
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Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
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COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

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Do use punctuation and capitalization as needed (except quotations).
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Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **Pepco Holdings, Inc.- Affiliates**

Lead Contact: Richard Kafka

Contact Organization: Potomac Electric Power Company

Contact Segment: 3

Contact Telephone: (301) 469-5274

Contact Email: rjkafka@pepco.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Richard Kafka	Potomac Electric Power Company	MAAC	3
Michael Mayer	Conectiv Power Delivery	MAAC	1
William Mitchell	Conectiv Power Delivery	MAAC	1
John Miller	Conective Energy Supply, Inc.	MAAC	5
Marjorie Garbini	Conective Energy Supply, Inc.	MAAC	5

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments
Guides should be separate documents or appendices that may be referenced in the Standard.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☒ Yes.

☐ No.

Comments
Wording should follow that of 063.2 and 063.3 for Distribution Providers that own transmission facilities.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Unaffiliated Third Party	☐ Delete ☒ Add ☐ Modify	**Term is used but not defined.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☒ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
No.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

None.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
2.0	☐ R ☒ M Number 1.0	**Define or clarify the term APR.**
63.3	☒ R ☐ M Number	**A general question that applies to several standards - what voltage level will define Transmisison Facilites or will some other measure define Transmisison Facilites?**
	☐ R ☐ M Number	
	☐ R ☐ M Number	

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Draft 2 of Proposed Version 0 Reliability Standards

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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**William J. Smith**	
Organization:	**Allegheny Power**	
Telephone:	**(724) 838-6552**	
Email:	**wsmith1@alleghenypower.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☒ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

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This questionnaire is divided into three sections:

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C – General Issues Applying to Operating and Planning (Questions 8–13)

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☐ Agree.

☒ Disagree.

Comments
All Reliability Coordinator functions should be assigned to the Reliability Authority, contingent on the Functional Model and the Version 0 Standards being implemented at the same time.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

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☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

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Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

It is important not to dispose the information in the guides, but they should not be included in the Standard. The guides should be included as attachments.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

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On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

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- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
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Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
55.3 and 55.4 should be a NAESB business practice.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
No show stoppers.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Peter Henderson / Khaqan Khan**	
Organization:	**IMO**	
Telephone:	**905-855-6258 / 905-855-6288**	
Email:	**Peter.Henderson@theIMO.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

The IMO appreciates the efforts of the Standards Drafting Team for their work in the development of draft 2 of Version Zero within the stipulated short time period. While we agree with SDT question, never-the-less, we must submit that having two entities with a reliability designation with overlapping roles and authorities is not acceptable in any of the standards of version 0 as it introduces significant confusion and jeopardizes the reliability of the Interconnection(s).

It is the IMO's position that:

(1) The Version Zero Reliability Standards should identify only one functional entity with a "Reliability" designation.
(2) The functional entity designated with "Reliability" must be the entity with the highest level of authority that will act in the interests of reliability for the overall Reliability Coordinator Area and the Interconnection
(3) The Version Zero Reliability Standards should retain the current designation of Reliability Coordinator in recognition of industry concerns over the application of the term Reliability Authority to this functional entity at this time.
(4) The existing "Reliability Co-ordinators " as designated by the Regions in their respective Reliability Plans should be registered as the Version Zero Reliability Coordinators.

(Refer to the IMO's position paper and rationales on the above matter)

Keeping designations of both "RA" and "RC" (as presently mentioned in draft-2 ver 0) would make the implementation and enforcement of these standards confusing and unnecessarily complicated. The evidences from these standards demonstrate that retention of both RA and RC would create more complexity and confusion in performing various operational tasks outlined in these standards. Moreover, in few cases, the complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays and confusion in performing various functions, thereby impacting reliability. Refer to more examples outlined in our comments in Q13.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

See comments in Question 1 above. As per our position stated in Q1 above the RA terminology should be replaced with RC or TO as applicable. The RC role should continue in the interim along with the TO.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Alternative B is preferred approach and its application shall result in positive impacts on reliability. However this process should not impede going forward.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

We feel that including these guides on a "shall be considered" basis would be outside of the scope of the Version 0 process. Version 0 Operating Policies are to be simply a direct translation of existing policies, without the addition of new requirements We support retaining these as "guides," for the present, and recommend consideration of their ultimate incorporation into the Version 1 standard.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Based on our previous comments, we agree with the decision of the Version 0 Drafting team to remove these from the Version 0 Draft 2 package. Such standards that have not gone through the entire field testing –revision process should be subject to the full "ANSI approved" NERC Reliability Standards Development Process. Any of the revised standards (based on blackout recommendations) should be developed via urgent action .

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

With regards to Standard 54, all the references to ATC should be removed and referred to NAESB. However, references to TTC should be retained in the NERC Version 0 standards since TTC impacts reliability.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments
There is a debate in the industry whether CBM is a commercial or a reliability issue. Some feel that CBM is to be used as a planning reserve margin. This issue needs to be resolved.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
We strongly believe that Standard 56 should be retained in the Version 0 Standard set as the TRM is utilized in the development of operating limits.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments
It appears that the question being posed is incorrect. There is no mention of "Distribution Provider" in standard -060 (Facility Ratings).
Any Distribution Provider related tasks pertaining to this standard can be captured within Transmission Owner tasks.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
BES Definition	☐ Delete ☐ Add ☐ Modify	**The definition of BES as posted in Glossary is too broad based and requires modification. See our comments in Q 12.**
Reliability Coordinator	☐ Delete ☐ Add ☒ Modify	**Definition of RC should be identical to the definition prescribed in Policy 9.**
RA Area	☐ Delete ☐ Add ☐ Modify	**This term should be modified to reflect the RC area**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

We feel that changing to new number scheme at this stage would create confusion and therefore, believe that the proposed numbering should not be applied at this time. There will be opportunity in the future, in particular in regard to the Version 1 standards, to group and rename/renumber standards.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments
See Q 11 for items related to show stoppers.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

We strongly believe that there should be only one functional entity with a "Reliability" designation", and that: "the existing "Reliability Co-ordinators" as designated by the Regions in their respective Reliability Plans should be registered as the Version Zero Reliability Coordinators."

Refer to the position paper submitted by the IMO on "RA vs RC Role - Version 0 Reliability Standards". During the balloting phase of version Zero, the IMO intends to vote in acceptance of Version 0 standards only upon a suitable resolution to the concerns and recommendations outlined in our position paper.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

In many standards, the compliance monitoring role has been assigned to an "Unaffiliated Third Party". Is this entity intended to be an "RRO"?. We suggest this role to be clarified and defined in the Version 0 glossary.

Version 0 Translations need additional work to address the initial requirement of ensuring that they are clear, well defined and measurable. Significant comments would need to be incorporated to meet this criteria. (see our specific comments in other questions)

There is a lack of a clear and consistent compliance process. While the standards and requirements are mentioned in all standards, in many of the standards the associated measures, compliance monitoring process and levels of non compliance are missing or not specified. For the purposes of effective implementation/enforcement of these standards, we recommended that the associated measures, compliance monitoring process and levels of non compliance should also be (a) simultaneously mapped/specified where these exist already, and (b) specifed/addressed in the very near future, where these do not exist today.

In a few standards the levels of non-compliance have not been translated/mapped correctly. As an example, in standard 028 levels of non-compliance have been incorrectly mapped from P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility).

It appears that presently there are different sources of NERC definitions on BES. The BES definition has remained a continued issue. We are of the opinion that at this stage the suggested definition of BES be augumented by allowing regions to implement their own performance (studies) based definitions indicating what facilities are impactive outside of the local areas. Accordingly, the version 0 BES definition needs to be modified.

A list of specific deficiencies and/or inconsistencies is outlined under the Q13-Table below. We are facilitating NERC SDT in this matter by identifying issues and presenting the associated resolutions. It is our expectation that our noted/listed concerns (re: under Q13 below) will be addressed and corresponding improvements made in Version 0 reliability standards.

In a number of cases, references to existing policies are not mapped correctly within the new Version 0 requirements. We are facilitating the NERC SDT in this matter by identifying such inconsistencies or needed references. The specifics are mentioned in our separate attached response (see appendix in separate attachment).

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
6.0	☒ R ☐ M Number 4.0	**Remove the wording "with like values but opposite signs" in order to make more clarity in R4.**
7.0	☒ R ☐ M Number 4.0	**(Also in R5) This needs to be clarified whether these requirements have to be fulfilled by both presently worded RA (i.e. new proposed terminology RC) and TO - "individually or jointly". It is not clear that who would be overall monitor. A more clearer role needs to be identified in this standard. Also Reliability entity should be termed as 'RC'. Please see comments in Q1.**
8.0	☐ R ☐ M Number	**Under "Purpose", the last sentence should be read as follows: Violations are also reported to the compliance monitor.**
8.0	☐ R ☒ M Number 1.0	**(Measures M1, M2 & M3) These measures in its present format outlines a complex co-ordination/reporting mechanism requiring that both RA & TO informs/reports IROL/SOL violations to RC, RC then evaluates actions of RA & TO and provides directions to RA/TO to return system within limits. RA/TO to then take corrective actions as directed by RC. The fact is that following a contingency resulting in IROL violation the system has to be returned ASAP and/or within 30 minutes.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	****Cont. from previous comment: The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in returning the system -ASAP, and in turn would create confusions thereby impacting reliability. There should only be one Reliability designation/entity i.e. RC. See our comments and position outlined in Q1 of NERC comment form re: use of one terminology RC only.**
9.0	☐ R ☐ M Number	**Under "Purpose", the last sentence be read as: "To ensure voltage levels, reactive flows, and reactive resources are monitored …….. in real time to protect equipment and to ensure/facilitate the reliable operation of the Interconnection"**
12.0	☐ R ☐ M Number	**Policy 3 B2 (Sharing Interchange schedule details via a secure network) should also be included as a requirement applicable to BA. As an example see standard 34-R3 for its inclusion in this standard as well.**
15.0	☐ R ☒ M Number 1.0	**(Also in Levels of Non-Compliance Lv 1&4) The terminology Responsible Entity and Requesting Entity needs to be more clearly outlined/qualified.**
16.0	☐ R ☒ M Number 1.0	**Same comment as above.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
17.0	☒ R ☐ M Number 5.0	**R5 refers to neighboring TOs while other sections refer to affected TOs. There is a need to use the same phrase in all sections of standards for purposes of consistency.**
17.0	☒ R ☐ M Number 6.0	**Delete the word "all".**
17.0	☐ R ☐ M Number	**Many of the guides in Policy 4D are in fact criterion that are not included in this std. We are of the opinion that any critical/ criteria needs to incorporated in future via urgent SAR process. The remaining should be mapped into an version 0 accompanying Reference Document.**
18.0	☐ R ☐ M Number	**Under "Purpose", the statement should be read as follows: To ensure reliability entities have clear decision-making authority and capabilities to take appropriate actions or direct the actions of others to return the transmission system to normal conditions during an emergency.**
8.0	☐ R ☐ M Number	**Under "Applicability" and "Requirements", an example of confusions being created due to use of both RA and RC can be seen. This related to our comments outlined in Q1 of NERC Comment Form. We are of the opinion that there should not be both an RA and an RC. The evidences from these standards demonstrate that a use of both RA and RC terminology's creates more complexity and confusion in performing various operational tasks outlined in these standards.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	****Cont. from previous comment: Moreover, the complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays and confusion in performing various functions thereby impacting reliability. Accordingly, one function role (ultimate authority - RC) should be prescribed in version 0 standard. **This comment is also applicable to Standards 13, 14, 15, 18, 19, 20, 22, 23, 24, 37, 38, 40.**
18.0	☒ R ☐ M Number 3.0	**In the sentence: "Under these circumstances the Transmission Operator or Generator Operator shall immediately inform the Reliability Coordinator or Transmission Operator of the inability to perform the directive …" The use of "or" is confusing and may create ambiguity. The specific role of entity responsible for 'providing' and 'receiving' information needs to be clarified. Should this be combined responsibility applicable to all or for any?**
20.0	☒ R ☐ M Number 7.0	**R7(b) should be read as Deploying/utilizing all available operating reserve R7(f) should be read as Reducing/shedding load, …….**
20.0	☐ R ☐ M Number	**Under "Levels of Non-Compliance", it is not clear whether the term "plans" mentioned in Level 3 and Level 4 pertain to the requirements R1 to R10 of this standard or refer to plans prescribed in associated std-025. It appears that compliance items are not mapped as per applicable requirements.**
20.0	☐ R ☐ M Number	**Under "Attachment 020-1 (A-1), there is another example of confusions being created due to dual roles. Only 'RC' terminology should have been used, see our comments outlined in Q1 above. The requirements and sections of this standard outlines that EEA has to be issued by RC and the RA has to make request to RC to issue EEA. The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in issuing EEA's thereby impacting reliability.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
22.0	☐ R ☐ M Number	**Under "Attachment 1" of "Attachment 022-2", incident No. 7 and footnote should be modified to reflect IROL and a new reference.**
23.0	☐ R ☐ M Number	**Policy 5, Section G, Requirement 1 has been mapped into Draft 2, but excludes a secondary requirement contained in the current NERC Policy 5G, R1. That being: "Procedures shall also be established for the communication of information concerning sabotage events to the appropriate parties in the Interconnection.**
	☐ R ☐ M Number	****Cont. from previous comment: Moreover, the Draft 2 does not include any references to the one "Guide" point found in NERC Policy 5G, regarding establishing procedures for supplying information to the media. Would this be included in the associated ver 0 reference document. We are of the opinion that any critical/ criteria needs to incorporated in future via urgent SAR process. The remaining should be mapped into an version 0 accompanying Reference Document.**
25.0	☐ R ☐ M Number	**Under "Levels of Non-Compliance", The levels of non-compliance have been translated based on template P6T1. P6T1's non-compliance were based on 14 elements/requirements of plan whereas, the attachment 025-01 now includes 20 elements (re: consideration in development of Emergency Plans).**
	☐ R ☐ M Number	****Cont. from previous comment: NERC may consider whether due to these increased requirements the numbers of elements triggering the non-compliance levels should also be changed or kept the same. e.g. "L1 – One of the applicable elements …. has not been addressed" may be revised as follows "L1 - Two of the applicable elements ….." etc….**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
26.0	☐ R ☐ M Number	**Under "Purpose", The second line in this section should be read as: Transmission Operator operating with insufficient generation or transmission capacity shall have the capabilities and authority to shed load rather than risk ……..……..**
27.0	☐ R ☐ M Number	**Under "Levels of Non-Compliance", it appears that there is a reference to the elements outlined in Attachment 027-01. This needs to be clarified. Accordingly, the levels of non-compliance should include the revised wording with specific reference to remove any ambiguity. e.g. Level 1: Plan (elements of Attachment 027-01) exists but is not……..**
28.0	☐ R ☐ M Number	**Under "Purpose", the following wording is suggested: Each reliability entity shall have a plan to continue ……**
28.0	☒ R ☐ M Number 1.0	**The term RC needs to be inserted into section of Applicability.**
28.0	☐ R ☐ M Number	**Under "Levels of Non-Compliance", the reference to Requirement R1 should be corrected to P6T3 instead of P6T2. More important, the levels of non-compliance have been translated/mapped incorrectly from the P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility). The levels of non-compliance should be corrected by mapping/translating the levels from P6T3 instead of P6T2.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
29.0	☒ R ☐ M Number 1.0	**R1 excludes the transmission owner. "Other RA, TO and BA" should read "affected RC….".**
29.0	☒ R ☐ M Number 4.0	**The requirement R4 needs to be applied to the transmission Owner as well.**
30.0	☐ R ☒ M Number 1.0	**Although the non-compliance regarding the interview verification items 1 and 2 have now been included in this draft (mapped from P8T1) yet the interview verification items 1 and 2 have not been mentioned/mapped (from P8T1) in this standard.**
31.0	☐ R ☐ M Number	**Under "Levels of Non-Compliance Lv 3", "…. not completed Criterion b) of Requirement 1-1." shall be read instead of " … not completed Criterion 2 of Requirement 1." To be consistent with the standard.**
33.0	☐ R ☐ M Number	**The term "reliability entities" needs to be defined to remove any ambiguity.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
34.0	☒ R ☐ M Number 1.0	**The last sentence should read "These communication facilities shall be staffed…" instead of "These communications shall be staffed…"**
35.0	☒ R ☐ M Number 2.0	**Reword to ”When a RELIABILITY COORDINATOR is aware of an operational concern, such as declining voltages, excessive reactive flows, or an IROL violation in a neighbouring RELIABILITY COORDINATOR, it shall contact the RELIABILITY COORDINATOR in whose RELIABILITY COORDINATOR AREA the operational concern was observed.”**
37.0	☒ R ☐ M Number 7.0	**We are of the opinion that there should not be both RA and an RC. Accordingly, one terminology should be used in this standard. See comments given in Q1. The information system (RCIS) related terminology should be used accordingly.**
38.0	☒ R ☐ M Number 8.0	**The last sentence should read "The Reliability Coordinator shall disseminate such information within its Reliability Coordinator Area, AS NECESSARY.**
38.0	☒ R ☐ M Number 12.0	**The end of the first sentence should read "…Reliability Coordinators shall be aware of the impact of the operation OF THAT SPECIAL PROTECTION SYSTEM on inter-Area flows."**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
38.0	☒ R ☐ M Number 17.0	**This requirement lacks clarity. It needs to be clarified that whether the word "limits" at the end of the last sentence refer to SOL or IROL or both?**
39.0	☒ R ☐ M Number 2.0	**For the purposes of clarity the R2 should read as follows: "A Reliability Coordinator experiencing a potential or actual SOL or IROL violation within its Reliability Coordinator Area shall, at its discretion, select from either a "local" (Regional, Interregional or subregional) or an Interconnection-wide transmission loading relief procedure."**
39.0	☒ R ☐ M Number 6.0	**The terminology "interchange scheduling standards" (referred to at the end of the sentence) needs to be clarified to reflect and reference to specific standard.**
51.0	☒ R ☒ M Number	**For Sections 1-4: R1-1 Speaks about "planning" the system but does not speak about "designing" the system. We are of the opinion that the drafting team should consider the term are not synonymous and its inclusion in all 4 - 051 standards.** **In M1-2, delete "none identified" at the end of the measure.**
53.0	☒ R ☐ M Number	**Section 1: R1-1 Requires Transmission Owners to have and document facility connection requirement for Generation, Transmission and End-user facilities to ensure compliance with NERC, Regional standards, as well as power pool criteria…. The term "power pool" should be eliminated and replaced with appropriate FM terms, such as Transmission Operator.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
56.0	☒ R ☒ M Number	**Section 1: R1-2, M1-1 "the Transmission System Providers and Transmission Owners …" shall be read instead of "and the transmission users …" to be consistent with the outlined purpose of this standard.** **Section 2: 2-1d same comment as above.**
56.0	☐ R ☐ M Number	**Section 1 & 2: Under "Compliance Monitoring Responsibility", the term "Unaffiliated Third Party" needs to be clarified.** ****This comment also applies to Standards 58 and 61.**
61.0	☐ R ☐ M Number	**Section 1: Under "Level 1 of Non-Compliance", " … and 061.1-R1-1." shall be read instead of "… 061." to be consistent with the standard.** **Section 1: Under "Level 4 of Non-Compliance", " … and the reporting procedures as required in Reliability Standard 061.1-R1-1." shall be read instead of "… and the reporting procedures." to be consistent with the standard.**
61.0	☒ R ☐ M Number	**In R7-1, "… load management to Reliability Authority(ies) Coordinators and Transmission Operator(s) on request ..." shall be read instead of "…load management to system operators and security center coordinators on request ..." to be consistent with the standard.**
63.0	☒ R ☐ M Number	**Section 2: It is suggested to add "facilities" after "…that owns protection system(s)…." In R2-1 and R2-2. R2-1 and R2-2 define requirements for transmission, generation owners and Distribution providers, while Standard 053.1 refers to transmission, generation and End-use facilities. 053.2 goes on to infer End-use facilities are owned by Distribution providers and Load Serving Entities (LSE). But 063.2 excludes LSEs. Suggest the same entities be used consistently throughout.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
69	☐ R ☐ M Number	**As currently stated, the levels of non-compliance are not selective. Some of the items listed in R1-1 are more critical than others. Missing R1-1 c is not the same as missing R1-1 h.**
72	☐ R ☐ M Number	**Under "Compliance Monitoring Process" and "Reporting Requirements", TFCO's comments on this issue (June 13, 2004): The basic goal of reporting vegetation contact is to more quickly identify the proximity of growing vegetation to critical transmission, and the threat posed, and to further identify possible trends suggesting poor vegetation management on the part of a given TO.**
72	☐ R ☐ M Number	****Cont. from previous comment: It is the opinion of the NPCC Task Force on Coordination of Operation that the above exceptions permitted in the current standard contradict the very intent of the vegetation reporting program and considerably weaken the effort. Such exceptions must not be permitted if the initiative is to succeed.**
9.0	☐ R ☐ M Number	**Under "Measures", "Compliance Monitoring Process" and "Levels of Non-Compliance", there is a lack of a clear and consistent compliance process. While the standards and requirements are mentioned in all standards, yet in many of the standards the associated Measures, Compliance Monitoring Process and Levels of Non Compliance are missing or not specified.**
18.0	☐ R ☐ M Number	****Cont. from previous comment: For the purposes of effective implementation/enforcement of these standards, we recommended that the associated measures, compliance monitoring process and levels of non compliance should also be (a) simultaneously mapped/specified where these exist already and (b) specifed/addressed in the very near future, where these do not exist today for consistency.** ****This comment also applies to Standards 19, 21, 26, 34 and 35.**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

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A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **NERC System Protection and Controls Task Force (SPCTF)**

Lead Contact: Robert W. Cummings -- SPCTF NERC Staff Coordinator

Contact Organization: NERC

Contact Segment:

Contact Telephone: 609-452-8060

Contact Email: bob.cummings2nerc.net or spctf@nerc.com

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☒ Do not agree with dropping these planning standards from Version 0.

Comments

The System Protection and Controls Task Force (SPCTF) is strongly opposed to the dropping of the Phase III and Phase IV Planning Standards from the Version 0 Standards, draft 2. The elimination of those standards from Version 0 will severely hamper the implementation of the recommendations and lessons learned in the August 14 blackout.

The basis for dropping the standards, explained in the comment form, is flawed. Those standards should not be eliminated simply because negative comments were received from a minority. Agreement with the comments of the few cannot be assumed for the majority of the industry or the ballot body that did not specifically comment on those standards.

Dropping standards that are specifically singled out by the blackout recommendations for improvements and strengthening simply makes no sense. Many of the planning standards that have been eliminated are the very standards that are critical to the August 14 blackout follow-on recommendations pertaining to voltage support and reactive power, disturbance monitoring measures, verification of generator capabilities, undervoltage load shedding, blackstart capability, automatic load restoration, etc.

As part of the overall NERC effort to address the August 14 blackout recommendations, the SPCTF has been specifically assigned to review existing planning standards related to system protection, system controls, and undervoltage load shedding. Elimination of standards related to those topics will prevent the SPCTF from fulfilling its scope of work.

Response to this comment should be forwarded to Bob Cummings, the NERC staff coordinator of the SPCTF at bob.Cummings@NERC.net.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

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Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **Salt River Project Transmission Services**

Lead Contact: Gary Nolan

Contact Organization: Salt River Project

Contact Segment: 1

Contact Telephone: 602-236-0922

Contact Email: ganolan@srpnet.com

Additional Member Name	Additional Member Organization	Region*	Segment*
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Art Feeney	SRP	WECC	1
Kristie Cocco	SRP	WECC	1
Shirley McKean	SRP	WECC	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1-4)

B – Planning Standard (Questions 5 -

C – General Issues Applying to Operating and Planning (Questions

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

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☒ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

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R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

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R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☒ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Automatic Generation Control	☐ Delete ☐ Add ☒ Modify	**The proposed definition is missing it's most important component - that of MATCHING generation to LOAD.**
Control Performance Standard	☐ Delete ☐ Add ☒ Modify	**A term cannot also be its definition**
Disturbance Analysis Working Group	☐ Delete ☐ Add ☒ Modify	**A term cannot also be its definition.**
Disturbance Control Standard	☐ Delete ☐ Add ☒ Modify	**A term cannot also be its definition.**
Integrated Value	☐ Delete ☒ Add ☐ Modify	**This term is used within other terms and should be defined**
Frequency Bias Setting	☐ Delete ☐ Add ☒ Modify	**This definition is not accurate. Its use within the ACE equation is to negate the effects of Governor action during a frequency excursion.**
Operating Committee	☐ Delete ☐ Add ☒ Modify	**A term cannot also be its definition.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Considerable improvements have been made in the formatting and presentation of the Standards in Draft 2. This has made the challenge of evaluating their accuracy much easier. It is more evident that the Drafting Team is headed in the right direction. But there continues to be some consistent errors and problems that need to be corrected and addressed.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
There no longer appears to be any "show stoppers" in Draft 2 of the Operating Standards.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
5.0	☐ R ☐ M Number	**In Purpose, the acronym ACE is used prior to being defined. Then, subsequently throughout the Standard, it is used and defined, used and not defined, etc. Be consistent by only defining it on its first appearance in this standard or do not define it since it is included in the Glossary.**
5.0	☒ R ☐ M Number 8.1	**Requirement 8.1 & 8.2 are misnumbered. Numbering a requirement as a subset to a requirement that does not exist (e.g. R8) is confusing and inaccurate. Additionally, R8.1 and 8.2 do not relate to one another and therefore have no reason to be included in the same subset. The proper numbering should be 8.1 = 8 and 8.2 = 9, with all subsequent requirements renumbered as needed.**
8.0	☐ R ☐ M Number	**In Purpose, it states that violations will be reported to the compliance program. Which program it is specifically referring to should also be stated here (e.g. NERC Compliance Program).**
9.0	☒ R ☐ M Number 7.0	**In this requirement and throughout most all of the Standards, the term Generator Operator is used. The NERC Glossary shows no such term. The NERC defined term is a Generation Operator. Consistency is critical.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
10.0	☐ R ☐ M Number	**In the Attachment 010-1 - Western Interconnection - New Transactions, the second table, Notes/Clarification, references the color coding of the preceding table. In the conversion, the color coding was not included. Either the coding needs to be retained or the table references changed.**
10.0	☐ R ☐ M Number	**Attachment 010-2 - Required Tag Data needs much more detailed information. For example, in items 4 and 16, it should state how the energy profile should be expressed (e.g. expressed in megawatts MW). In items 7 and 8, it should state that the valid POR and POD must be registered. When physical characteristics are required, an example of what that means needs to be included. Item 17 needs to state what information about a Contact person is required (e.g. name, phone, fax, email?).**
11.0	☒ R ☐ M Number 1.0	**Subsection a) sites Scheduling Agent and is capitilized as a defined term. This is not a defined term in the NERC Glossary. Also, according to the list provided here, it would appear LSEs and PSEs will no longer be provided a copy of the tag. I do not believe that is true.**
14.0	☒ R ☐ M Number 1.2	**Again I would first argue that you should not have a subsection when there is no primary section from which to sub (e.g. R1.1 and 1.2 when there is no R1). But you certainly cannot have two subrequirements numbered identically. In the Clean Version, there are two requirements both labeled R1.2. The second of which does not even exist in the Red-lined Version.**
14.0	☒ R ☐ M Number 2.0	**The acronym LTC is sited, but the definition is not given nor is it a defined term in the NERC Glossary.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
20.0	☐ R ☐ M Number	**Attachment 020-1 - Energy Emergency Alerts, Section 3.6 - Reporting, states that the report that must be filled out is in appendix 9B, Section C, which will no longer exist.** **Section C of this same attachment, refers to NERC Policy 9B section B paragraph 3.5. That policy will no longer exist when this Standard becomes active.**
25.0	☒ R ☐ M Number 2.0	**Although the Drafting Team acknowledged that there is much repetition throughout these standards and that it is hoped that much will be eliminated through this process, this particular Requirement is an exact duplicate of Standard 031 R1.2. When the duplication is this obviously, I believe it must be handled in this process and one requirement eliminated.**
25.0	☐ R ☒ M Number 2.0	**Correct sentence structure to say - its two most recent annual self-assessments.**
30.0	☐ R ☒ M Number 1.0	**Measures state items that MUST be done. That is the purpose of the Requirement. If it must be done, then it is a REQUIREMENT. It isn't a MEASURE.**
31.0	☐ R ☐ M Number	**Level 3 of the Levels of Non Compliance is missing key words. The proper sentence structure should be something like - all of A reliability authority's, transmission operator's, OR balancing authority's OPERATING PERSONNEL have not completed criterion 2… Without this correction, the Level is only reached if every single RA, TO, and BA in NERC is deficient in this manner.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
33.0	☐ R ☐ M Number	**In the last sentence of the Purpose, the word THAT is repeated.**
33.0	☒ R ☐ M Number 1.0	**The term Reliability Coordinators should be SINGULAR in this sentence for proper grammar.**
2.0	☐ R ☐ M Number	**In the Levels of Non-Compliance, the acronym APR was brought over from the Compliance Templates without its definition. Nor is it listed in the NERC Glossary.**
31.0	☒ R ☐ M Number 1.2	**The requirement for one week of Emergency Training is already addressed in Policy 6B. Inclusion in Policy 8 is redundant.**
31.1	☐ R ☐ M Number	**Attachment 031-1 is a very comprehensive list of fundamental training topics. Unfortunately, these topics are more appropriate for new Operators and do not address the training needs of seasoned Operators. With a NERC Continuing Education Program on our doorstep, it is a must that this attachment should also include advanced topics that are appropriate for Continuing Education.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
2.0	☒ R ☐ M Number 4.0	**"The Disturbance Recovery Criterion is that e" is a larger font than rest of document.**
13.0	☒ R ☐ M Number 5.0	**Heading above R5: "Dynamic" is misspelled ("Dymamic").**
20.0	☐ R ☐ M Number	**Heading should be 020 instead of O20**
20.0	☐ R ☐ M Number 2.1	**Attachment 020-1. Energy Emergeny Alerts** **Period at the end of sentence. (page 020-6)**
20.0	☐ R ☐ M Number 2.0	**Attachment 020-1. Energy Emergency Alerts** **Notification. (Line 2) "Authorities" misspelled ("Authorizes")**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**David Kiguel**	
Organization:	**Hydro One Networks Inc.**	
Telephone:	**416-345-5313**	
Email:	**David.Kiguel@HydroOne.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☒	1 - Transmission Owners
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☐ WECC		
☐ NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

Group Name: **Hydro One Networks Inc.**

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Contact Organization:

Contact Segment:

Contact Telephone: 416-345-5313

Contact Email: David.Kiguel@HydroOne.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Mike Penstone	Hydro One Networks Inc.	NPCC	3
Ajay Garg	Hydro One Networks Inc.	NPCC	1

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☒ Agree.

☐ Disagree.

Comments

Hydro One supports the IMO's position detailed in the paper presented by the IMO on the RC/RA issue.

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Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

This suggestion is outside the scope of what the Version 0 Standards Drafting Team was charged to do. The Version 0 Standards are to be a direct translation of of the Operating Policies. The attachments should remain as "guides" at this time and the matter they cover should be considered for incorporation into the Version 1 Standards.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Hydro One supports the removal of these standards from Version 0. Standards that have not gone through the entire field testing-revision process or the pilot program should go through the full ANSI approved process before becoming full fledge standards. If necessary, they could be expedited as Urgent Action Standards.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
RA	☒ Delete ☐ Add ☐ Modify	**Realign with RC**
RC	☐ Delete ☐ Add ☒ Modify	**Define as in Policy 9**
RA Area	☐ Delete ☐ Add ☒ Modify	**Reflect RC Area**
BES	☐ Delete ☐ Add ☒ Modify	**Hydro One does not agree with this defintion. See comment/justification on question 11.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Industry has been working with the present numbering scheme. Modify to the new numbering after approval by the NERC BOT.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments
See Question 11

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Hydro One Networks Inc. cannot support the Version 0 Standards as drafted for as long as the definition of Bulk Electricity System (BES) is not properly corrected. As drafted, the definition is inconsistent with the equivalent term contained in the draft USA Reliability Legialation (see below). The definition of BES has been discussed and accepted by all stakeholders, NERC, NERC BOT, Regional Councils, EEI Members, CEA and its Canadian Member Utilities, and other USA entities. We see neither the need nor the advisability of departing from the legislative wording and believe that changing the definition of BES goes beyond the mandate/scope of the Version 0 Drafting Team.

The definition of BES is a Policy matter and should be resolved by the NERC BOT.

The draft bill referrred to above contains the following language:

SEC 216. ELECTRIC RELIABILITY

(a) DEFINITIONS. For the purpose of this section

(1) The term "bulk power system" means

(A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and

(B) electric energy from generation facilities needed to maintain transmission system reliability.

*** The term does not include facilities used in local distribution of electric energy.**

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Ray Morella**	
Organization:	**FirstEnergy Corp**	
Telephone:	**330.384.5686**	
Email:	**morellar@firstenergycorp.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☒	1 - Transmission Owners
☒ ECAR	☐	2 - RTOs, ISOs, Regional Reliability Councils
☐ FRCC	☐	3 - Load-serving Entities
☐ MAAC	☐	4 - Transmission-dependent Utilities
☐ MAIN	☐	5 - Electric Generators
☐ MAPP	☐	6 - Electricity Brokers, Aggregators, and Marketers
☐ NPCC	☐	7 - Large Electricity End Users
☐ SERC	☐	8 - Small Electricity End Users
☐ SPP	☐	9 - Federal, State, Provincial Regulatory or other Government Entities
☐ WECC		
☐ NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1-4)

B – Planning Standard (Questions 5 -

C – General Issues Applying to Operating and Planning (Questions

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☒ Disagree.

Comments

Version '0' should emphasize the NERC functional model in its entirety, and that should include the Reliability Authority. Given the current controversy between the Reliability Authority and Reliability Coordinator, consensus must be reached that incorporates a single reliability entity. Having two entities designated as responsible for overall reliability will just fuel additional confusion. Our preference would be to make that entity the Reliability Authority, as is designed in the functional model. Entities that have problems incorporating the Reliability Authority (RA) functions they should modify their procedures and protocols in a manner that is conducive to the NERC functional model. This model has been approved by the industry, and as such, should be followed in a consistent manner throughout the entire interconnection. In any case, there should be only one entity responsible for overall reliability.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Version 0 should retain Transmission Operator and Reliability Authority as stated in draft 2. Reason for this are the same as given in question 1. Transmission Operator and Reliability Authority need to be incorporated into the current standards for consistancy in the migration to Version 1, which will incorporate the full functionality of the functional model.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Alternative A, translate existing policy and correct any deficiency in the future, should be adopted by FE for the following reasons:

1) The Drafting Team has only addressed half of the problem, dynamic scheduling. There is no mention of pseudo ties. In fact, pseudo tie is not defined in the glossary.

2) Alternative B further complicates the ability of one balancing authority providing regulation (Ancillary 3) to another balancing authority or another balancing authority's market. A number of balancing authorities provide regulation (Ancillary 3) from generation external to the balancing authority's area.

3) There are many cases where the current Policies or Standards are either deficient or ambiguous and the drafting teams have not attempted to correct the problem. All of these types of corrections or enhancements should go through the complete SAR process and not be corrected or enhanced on an ad hoc basis in Version 0.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

Guides should not be included in any part of the standard. The standard should be able to stand on its own merits. There should be no need to include guides or references that would help make the standard more clear. If guides are included with the standard, they have the potential to become part of the 'sprit' in which compliance and measurements may apply. Guides should be only a stand alone document that has no influence on mandatory compliance of standards. Guides should be part of a reference document that is maintained until the full version 1 is implemented.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

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- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

As noted in the discussion, the translation process for Version 0 does not allow for modifications, although field testing may have resulted in several comments to the current requirements. Therefore translating a standard with recognized deficiencies, or untested, would be unproductive and development of a tested and potentially modified standard should be postponed to the Version 1 effort.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Although these process and margins were developed to provide an indication of transmission capacity available for use, they describe calculation considerations and margins intended to protect the reliability of the transmission system.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Although these process and margins were developed to provide an indication of transmission capacity available for use, they describe calculation considerations and margins intended to protect the reliability of the transmission system.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Although these process and margins were developed to provide an indication of transmission capacity available for use, they describe calculation considerations and margins intended to protect the reliability of the transmission system.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments

Assuming the wires operated by the Distribution Provider do not respond to transmission network flows in an appreciable manner, it may not be necessary for the Distribution Provider to comply with these standards.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

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Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

The numbering scheme developed by the Version 0 drafting team looks appropriate. As long as there is consistency in the 3 letter acronym that is relative to the various functions in the NERC functional model.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

These improvements would include an industry wide consensus on the Reliability Authority and Reliability Coordinator controversy. There should be only one entity responsible for overall reliability.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
There are no 'show stoppers' that would prevent us from not voting for version 0

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

The deployment of the functional model as reflected in the Version 0 standards may result in significant uncertainties and ambiguities that will potentially compromise regional reliability. This arises from several perspectives – the registration of entities according to the current Functional Model requires that a unitary designation be ascertained for each function, despite the functions being shared or performed by several entities. For example, the Transmission Operator function in the PJM footprint is shared between the RTO/market operator and the physical asset owning entities. Thus there is no method, other than executing complex interleaved agreements among the real entities on behalf of the shared functions. In addition, the Version 0 standards impose mandatory obligations upon the functional model registered entities, yet do not address the present gaps in the reliability coverage of the standards. These obligations are currently not intended to be addressed until the eventual adoption of the Version 1 and subsequent standards. Thus, recognized limitations and problems present in the current standards are not being remedied in the Version 0 process. This will inevitably render it increasingly ambiguous to align the (uncertain delineation of) functions against the real (and often complex relationships among) operating entities against the (weakly enhanced and vague) standards and requirements embodied in Version 0.

The fact that supporting materials such as guides and references are necessary demonstrates the need for an expeditious transition to the Version 1 Reliability Standards. The Version 0 Reliability Standards should therefore recognize the need for a quick transition to Version 1 where clear and objective standards can be easily and fairly enforced. At a minimum, the Version 1 Reliability Standards should ensure that: all critical terms are defined clearly, the standards are precise, the standards have objective measures for ascertaining compliance, and the standards are internally consistent with one another. Only with these improvements to the existing and Version 0 standards can the Version 1 Reliability Standards form a strong foundation for a fair and expeditious enforcement program in which all stakeholders can have confidence and benefit from.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
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	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Kathleen Davis**	
Organization:	**Tennessee Valley Authority**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☒ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
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	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **Transmission Power Supply**

Lead Contact: Chuck Feagans

Contact Organization:

Contact Segment: 1

Contact Telephone: 423-751-4439

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*
Tim Ponseti			
Larry Akens			
Chuck Feagans			
Edd Forsythe			
Larry Goins			
Stuart Goza			
Bob Dalrymple			
Mitch Needham			
Byron Stuart			

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments
TVA does not support the concept that RA equals RC.
TVA does not feel that both RA & RC should be included in Version 0 - it needs to be one or the other.
TVA feels that the RC should be in Version 0 where it applies to Policy 9 and therefore the RA needs to come out of Version 0 at this time.
Where RA is used in Version 0, outside of Policy 9, it should be replaced with Transmission Owner, Transmission Operator, or Balancing Authority as appropriate.
Leave implementation of the RA concept to future versions.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
In order to solve industry confusion, leave RA out of the model.
Make the Reliability Coordinator responsible for Policy 9 in Version 0.
Transmission Owner, Transmission Operator and/or Balancing Authority should replace the RA for applicable policies outside Policy 9.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

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R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments
TVA Agrees, if you eliminate the word "these" in the above response.
For clarification, all guides should be labled "Should be considered" as opposed to "shall be considered".

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments
They should be proposed as new standards, using the Urgent Action SAR process as appropriate.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Reliability Authority	☒ Delete ☐ Add ☐ Modify	
Reliability Authority Area	☒ Delete ☐ Add ☐ Modify	
Transmisson Owner	☐ Delete ☒ Add ☐ Modify	**acronym TO** **this is often used to refer to the Transmission Operator**
Transmission Operator	☐ Delete ☒ Add ☐ Modify	**TOP** **so as not to be confused with Transmission Owner**
Reliability Coordinator	☐ Delete ☐ Add ☒ Modify	**to reflect modifications made based on comments to remove BA from Version 0**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
However, there is still a lot of flux in the functional responsibilities and their acronyms

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

We feel that inclusion of both RA & RC creates confusion.
Phase III & IV Planning Standards shouldn't be included in the third draft of Version 0.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

We appreciate all the time and hard work of the Standards Drafting Team and all others who made contributions to this process.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
20.0	☒ R ☐ M Number 2.0	**Remove "Reliability Coordinator". RC does not own or operate generation. BA has a capacity and energy emergency plan. RC implements EEA process.** **RA needs to come out.**
20.0	☒ R ☐ M Number 4.0	**Insert after Reliability Coordinator, "who has a Balancing Authority"**
20.0	☐ R ☒ M Number 1.0	**Delete "Reliability Coordinator"3 times** **Delete "Reliability Authority" 3 times**
20.0	☐ R ☐ M Number	**Attachment 020-1 - replace "Operating Security Limits" with "System Operating Limits" throughout the attachment**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
22.0	☐ R ☐ M Number	**Attachment 022-1 - replace "Operating Security Limits" with "Interconnected Reliability Operating Limit" .**
27.0	☒ R ☐ M Number 10.0	**5.c To be consistent with Standard 040 R5, this requirement needs to be modified to state that the Reliability Coordinator approval must be obtained prior to resynchronization of major islands**
	☐ R ☐ M Number	
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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name: **FRCC**		
Organization:		
Telephone: **813-289-5644**		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name: **FRCC Members**

Lead Contact: Linda Campbell

Contact Organization: FRCC

Contact Segment: 2

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Additional Member Name	Additional Member Organization	Region*	Segment*
Tom Washburn	Orlando Utilities Commission	FRCC	3
Ted Hobson	JEA	FRCC	1
Amy Long	Lakeland Electric Utilities	FRCC	1
Richard Gilbert	Lakeland Electric Utilities	FRCC	3
Steve Wallace	Seminole Electric Cooperative	FRCC	4
Alan Gale	City of Tallahassee	FRCC	5
Pedro Modia	FPL	FRCC	1

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☒ Agree.

☐ Disagree.

Comments

The functional model questions must get resolved. We believe the FMWG should look at the comments filed in early 2004, plus review the comments received and information learned in the drafting of the Version 0 standards. The FMWG must address these issues and resolve the functional model if it continues to be the basis for the development of reliability standards.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

We believe this will be a positive step in eliminating the confusion between the RA and RC. In review of the draft version 0 standards, everywhere RA is indicated, there is also a TOp. It makes sense to us to apply all transmission system responsibilities to the TOp but not both. The FMWG should make a high priority of addressing this issue and correcting the functional model to eliminate the confusion.

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In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

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DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

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R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

We are comfortable with correcting the deficiency in the Version 0 standard, but want to make sure that it specifically applies to a dynamic schedule. The term dynamic transfer in the purpose could apply to more than just a schedule.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

This is clearly a standard that has implications of both reliability and business practices. Perhaps a joint NERC/NAESB team could develop a set of common standards for both NERC and NAESB.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments
Same comment as above.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments
Same comment as above.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments
See our response to question 11.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

We think this is needed and do not see any reason why it should not be done with the implementation of Version 0 as a starting point.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments
Please see our response to question 11 on show stoppers.

Question 11:

Are there any "show stoppers" in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Yes. We commented in the first posting that we believed that the responsibilities currently assigned to Control Areas and Operating Authorities should only be applied to Balancing Authority, Transmission Operator and the Reliability Authority. Now that we agree that the RA should not remain in the Version 0 standards, these responsibilities should be given only to the BA and TOp. The implementation of the functional model is only partial at this time, and now the compliance obligations only rest on the reliability functions. The Gen, LSE, DP etc are not being monitored for compliance at this time and there is nothing in the near future to change this. The obligation to obtain the necessary information etc from these entities rests on the BA and TOp. The Version 0 standards can be worded properly to place the responsibility on the BA and TOp. The BA and TOp should be expected to have the appropriate mechanisms and agreements in place to enable them meet these responsibilities.

In addition, for the planning standards it appears that for requirements and measures belonging to the RRO's, the drafting team has changed the compliance monitor from NERC to an Unaffiliated Third Party. We do not understand why, and do not agree with this change. NERC should continue to be the compliance monitor for regional obligations. Was any consideration even given to cost of an unafilliated third party? This must be changed back to NERC.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
1.0	☒ R ☐ M Number 1.0	**This is really standard 001. The protected comment form automatically changes the format of the number field.** **The symbols in the paragraph for epsilon are non consistent. It is not a big deal, but the standard should use the same symbol throughout.**
1.0	☒ R ☒ M Number 1.0	**Standard 001. In R1 the term bound was changed to bandwidth. In this R2, it still uses the term bound. This needs to be consistent. This is also true in M1 when referring to the Target Frequency Bound. Should that be bandwidth as well?** **In M2, the two equations for violation clock-ten-minutes may need to be rearranged in the final document for readability.**
1.0	☐ R ☒ M Number 2.0	**Standard 001. The last paragraph of M2 that reads (A Balancing Authority providing or receiving Supplemental Regulation Service…..) seems like it should be a requirement. Should this have been R5 and just got lost in the editing? This may need to be reviewed.**
1.0	☐ R ☐ M Number	**Standard 001. The Regional Difference refers to the ERCOT Control Performance Standard 2 Waiver. We believe the details of this waiver need to be spelled out in this standard and not referenced back to something that could be lost. The specifics need to be a part of the standard.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
2.0	☐ R ☒ M Number 1.0	**Standard 002. Measure M1 begins with what the BA shall calculate and report. The first part of this paragraph really should be a requirement. It should reference Reportable Disturbances. We would suggest moving this to the requirements section and beginning M1 with the statement, Disturbance Control Standard is measured as the percentage recovery (Ri) and then have the diagram and explanation.**
2.0	☐ R ☒ M Number 1.0	**Standard 002. The portion of M1 that came from [PSRD 2.3] states, Determination of ACEm or ACEm. Should the, or ACEm, be removed? It looks like an error to us.**
2.0	☐ R ☐ M Number	**Standard 002. The Levels of Non-compliance are not really levels of non-compliance. These are what a BA or RSG must do if they do not meet the DCS, so really appear to be sanctions or penalties associated with non-compliance. This should be reviewed and corrected.**
	☐ R ☐ M Number	
4.0	☒ R ☐ M Number 1.0	**Standard 004, R1 states that a single RC in each Interconnection will be designated at the time monitor. Who will decide this and by when? The current policy states it is the NERC ORS and it is decided by Feb 1st. Will this stay the same?**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
4.0	☒ R ☐ M Number 3.0	**Standard 004, R3. For clarity, we would suggest the sentence be restructured to read as follows, Each Balancing Authority, when requested, shall participate in a Time Error Correction by one of the following methods:** **In R3.1 and R3.2 the word shall needs to be inserted between Balancing Authority and offsets. Offsets needs to be changed to offset.**
4.0	☒ R ☐ M Number 4.0	**Standard 004, R4. This states that any RC shall have the authority to terminate a time error correction in progress. The current policy says they may request the termination. Wouldn't the Time Monitor be the one to decide?**
5.0	☒ R ☐ M Number 11.0	**Standard 005, R11. This may be a nit, but we are not clear. This requirement states that the BA shall use agreed upon ramp rates in the Scheduled Interchange values to calculate ACE. THe current policy states it should include the effect of ramp rates. Not sure these are the same thing. May want to double check this.**
6.0	☐ R ☐ M Number	**Standard 006, Regional Differences. THe MISO RTO Inadvertent Interchange Accounting waiver is referenced here. Need to include the details of the waiver itself as part of the standard, not just a reference to something else.**
7.0	☒ R ☐ M Number	**Standard 007, R1--R6. Need to remove the RA and only leave Transmission Operator. Also for R2, need to put BA's in with the TOps in operating to protect against instability, etc etc. Then would also need to include BA's in the applicability section.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
8.0	☐ R ☐ M Number	**Standard 008. THe last sentence of the purpose is unnecessary and should be removed. Also, compliance template P2T2 should be a source reference. Need to add BA back into the applicability section as R3 should also apply to BA's.**
8.0	☒ R ☐ M Number 3.0	**Standard 008, R3 & R4. Need to add BA along with the TOp to take appropriate action. In R1-R4 need to remove the RA and leave the TOp with the transmission responsibilities.**
8.0	☐ R ☒ M Number	**Standard 008, M1-M3. What kind of evidence is anticipated? The word evidence can be very subjective and broad. Also the RA should be removed from these measures.**
8.0	☐ R ☐ M Number	**Standard 008. In the Compliance Monitoring Section, the 2nd paragraph states that the RC shall report to the RRO and NERC within 72 hours. Where did this come from? We did not see this is current policy or in the compliance templates P2T1 or P2T2. Also the RC reporting any SOL that has become an IROL because of changed system conditions is very different that what is in the compliance assessment notes of P2T1. Need to double check that the intent has not been changed.**
8.0	☐ R ☐ M Number	**Standard 008, Levels of Non-compliance. Need to remove the RA from each of these.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
9.0	☒ R ☐ M Number 5.0	**Standard 009, R5. Suggest striking the words, by the Transmission Operator, in the last line. It is redundant.**
9.0	☒ R ☐ M Number 9.0	**Standard 009, R9. Need to keep the TOp and the BA and remove the RA. The words of the first draft were more appropriate.**
9.0	☒ R ☐ M Number 8.0	**Standard 009, R8. We do not see this requirement in current policy. It appears to be an extension of the generator requirement. We do not think this is necessary, and if it would be necessary, the information should be supplied to the RC, not the RA.**
10.0	☐ R ☐ M Number	**Standard 010, Purpose. The reliability impacts should be assessed by Reliability Coordinators instead of RA's.** **The WECC waiver mentioned in the Regional Differences section should be spelled out. The details of the waiver need to be included as part of the standard, not the reference to one. The policies that the waiver applies to will no longer exist.**
13.0	☒ R ☐ M Number 1.0	**Standard 013, R1. We are uncertain that all of the reliability events list (a-e) are in the existing policy. Events a, d and e do appear in [Policy 3D 2] but where do events b and c come from?**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
13.0	☒ R ☐ M Number 2.0	**Standard 013, R2. How is this requirement any different than what is already stated in R1.1.1 and R1.1.2? It appears to be redundant. If it is different and stays in, Reliability Authority needs to change to RC.** **In R3 the last line refers to the sink BA, should that really be sink or source. Doesn't sink or source depend on wether it is the return of generation or load? Does this need any clarification?**
13.0	☐ R ☐ M Number	**Standard 013, Regional Difference. The WECC Waiver details need to be described rather than just referenced. The existing policies the waivers refer to will be gone and the details need to be part of the standard itself.**
14.0	☒ R ☐ M Number	**Standard 014, all requirements. The RA needs to be removed from each of the requirements. The TOp and BA should be the only entities these apply to.** **In R1.1, it should be rewritten to require the BA to obtain the information from the Generator Operator. We do not think Gen Op should be included. Please see our response to question 11.**
15.0	☒ R ☐ M Number 1.0	**Standard 015, R1 and R1.1. All references to the RA should be changed to the RC in these two requirements.** **In R2, the RA should be removed. In R4, the reference to RA should be changed to RC.**
15.0	☐ R ☒ M Number 1.0	**Standard 015, M1. The RA in this measure should be changed to RC. The current compliance template P4T2 states RC and it should remain.** **In both non-compliance level 1 and 4, responsible entity should be changed to BA and TOp and the data should be provided to the RC instead of requesting entity. In order to remove ambiguity, these changes are needed.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
16.0	☒ R ☐ M Number	**Standard 016, purpose. RA should be changed to RC. P4T4 requires info to go to the RC.** **R1.1 should be rewritten to require the TOp to obtain outage information from the GenOp and then provide it to their RC. In R1.2 the TOP should provide the info to the RC, not the RA and the RC, not the RA should establish the outage reporting requirements.**
16.0	☒ R ☐ M Number	**Standard 016, R2 and R3. The reference to RA's should be removed and the requirement only apply to TOp and BA's.** **In R4, RA should be changed to the RC as the compliance template P4T4 currently states the RC.**
16.0	☐ R ☒ M Number 1.0	**Standard 016, M1 uses the word monitored entity. This is ambiguous and should be clarified to state the BA's and TOp's, plus RA needs to be changed to RC.** **In the Compliance Monitoring Process first paragraph, the RA needs to be changed to the RC. In the 3rd paragraph, the first sentence should start with IF and RA should be changed to RC throughout the paragraph.**
16.0	☐ R ☐ M Number	**Standard 016, Levels of Non-Compliance. In Level 1 and Level 4, responsible entity needs to be changed to BA or TOP and RA should be changed to RC. Responsible entity is ambiguous.**
17.0	☒ R ☐ M Number	**Standard 017, R1 and R2.2- RA should be removed and only apply to the TOp.** **In R3.2 and R4, the RA should be changed to the RC.** **We are not sure where R5 came from, can not locate it in existing policy and we are not sure that it is clear.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
17.0	☒ R ☐ M Number	**Standard 017, R5.2 and R6 - RA should be replaced with RC.**
18.0	☐ R ☐ M Number	**Standard 018, Purpose. Would suggest the sentence to read…return the transmission system to normal conditions during and after an emergency.** **In R1 and R2 need to remove the RA, but keep the BA that was removed in this draft.**
18.0	☒ R ☐ M Number	**Standard 018, R3. Need to keep the BA, remove the RA, and strike the phrase, ….and the Generator Operator shall comply with reliability directives issued by the Transmission Operator reliability directives, as the phrase is not needed.** **In R4 remove the RA.** **In R5 and R6, remove the RA and keep the BA. The BA's are taking the place of IA in V0 and they may have to implement emergency interchange schedules.**
18.0	☒ R ☐ M Number	**Standard 018, R7. In parts a and b, RA needs to be changed to RC. In part c, the TOp should notify adjacent TOp's and RA's should be removed.** **The last R7 (looks like it should really be R8), the reference to RA in the 5th line needs to be changed to the RC and the RA in the 6th line needs to be removed as the BA and TOp will implement firm load shedding.**
19.0	☒ R ☐ M Number	**Standard 019, Purpose. Need to change the RA to RC.** **RA needs to be removed from all requirements.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
20.0	☒ R ☐ M Number	**Standard 020. Need to remove RA from the purpose and from R1, R2 and R3.** **R4- we can not find this in P5T1. It looks like it is included to be a comparable requirement for the RA or RC that the BA has in R3. Since RA should be removed, and RC is covered under the policy 9 standards, we suggest removing R4 completely.**
20.0	☐ R ☒ M Number	**Standard 020, M1 and M2. Need to remove the RA and TOps should be added back in.** **Both of these measures appear to be more of compliance monitoring methods rather than measures. Need to evaluate if they should be labeled as such and not have any measures.** **RA needs to be removed from the Data Retention statement.**
21.0	☒ R ☐ M Number	**Standard 021. Need to remove RA from all requirements.**
22.0	☒ R ☐ M Number	**Standard 022 In R2, R3 and R3.1 need to remove RA.** **R3.2 is not really a requirement. It looks as if it should be added to the end of R3.1.** **Remove RA from R3.3, R3.4 and R4. Also remove RA from attachment 022-1**
23.0	☒ R ☐ M Number	**Standard 023 Remove RA from all requirements.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
24.0	☒ R ☐ M Number	**Standard 024. Remove RA from all requirements. R4 should be reworded to place the requirement on the BA to obtain the information from the other entities. (see response to question 11)** **We recommend adding BA to R17, then both the TOP and BA report to the RC. Then you can remove R18 as it will be redundant.**
25.0	☒ R ☐ M Number	**Standard 025. Remove RA from all requirements. R3 should apply to both the TOP and the BA. In R4.3, we would suggest rewording to state…..Develop, maintain and implement a set of plans to implement load shedding for operating emergencies. In R4.4, we would suggest rewording to….Develop, maintain, and implement a set of plans to implement System Resoration after operating emergencies.**
25.0	☒ R ☐ M Number	**Standard 025. In R5.1, the word consider should be replaced with ..must address.. since the levels of non-compliance are based on including numbers of items from attachment 025-1.** **The last sentence of R6 should be deleted since requirments for RAs will be removed. In R7, the TOP and BA shall coordinate with the RC, not the RA. For R7.1-R7.4 the lead in of the entities is not needed since it is already stated in R7 and are the listing of steps.**
25.0	☐ R ☒ M Number	**Standard 025 M1-M2. These are not really measures are are shown as data retention items in compliance template P6T1. This standard may not have any associated measures. Remove RA from the measures (really data retention) and the self assessment note in the compliance monitoring process.**
26.0	☒ R ☐ M Number	**Standard 026. Remove RA from all requirements.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
27.0	☒ R ☐ M Number	**Standard 027. Remove RA from all requirements and the compliance monitoring process.** **For Level 2 and Level 4, instead of just stating should address a number of requirements, it should really refer to the elements listed in attachment 027-1. Need to tell where the requirements are.**
28.0	☒ R ☐ M Number	**Standard 028. Remove RA from R1, measures and compliance monitoring process. It appears that R1 h and R1i really concern restoration rather that back up control centers. Perhaps these need to be included in Standard 027.** **The source reference for the Levels of non-compliance show P6T2, and it should be P6T3. Need to make that correction.**
29.0	☒ R ☐ M Number	**Standard 029. We suggest removing RA and replacing with RC in requirements R1, R2, R3, R4 and R5. The telecommunication requirements should also apply to RC's.**
30.0	☒ R ☒ M Number	**Standard 030. Remove RA and replace with RC throughout the standard. In M1, insert the words..have the..between personnel and responsibility in the second line.** **In M1, item b should be reworded to…The written current job description shall state operating personnel…..** **In M1, item c should be reworded to…The written job description shall be readily …..**
30.0	☐ R ☒ M Number	**Standard 030. In M1, item d should be reworded to…Written operating procedures shall state that during normal and emergency conditions….This is to include number 4 that is on the compliance template P8T1 that was left out.** **Also, are performed should be changed to shall be performed in the last sentence. In the self-certification paragraph, it should refer to items 1-4 in the measure, not requirements. Level 3 and level 4 of non-compliance, change operating authority RC,TOP and BA.**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Linda Campbell**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☒	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **FRCC**

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Additional Member Name	Additional Member Organization	Region*	Segment*
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Ted Hobson	JEA	FRCC	1
Amy Long	Lakeland Electric Utilities	FRCC	1
Richard Gilbert	Lakeland Electric Utilities	FRCC	3
Steve Wallace	Seminole Electric Cooperative	FRCC	4
Alan Gale	City of Tallahassee	FRCC	5
Pedro Modia	FPL	FRCC	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

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☐ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

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R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
31.0	☒ R ☐ M Number	**Standard 031. Remove RA and replace with RC throughout. R1.1d uses the word trainers, we would recommend changing to training staff.** **In the Compliance Monitoring section, under self certification it refers to requirements 1 and 2. There is not a requirement 2. We believe that R1 and R1.1 was intended, but the drafting team should check and clarify.**
31.0	☐ R ☐ M Number	**Standard 031. In the Levels of Non Compliance, for Level 2, it should meet all five criteria under R1.1, not requirement 1.** **For Level 3, should state have not completed R1.2, not the criterion 2 of requirement 1.** **We suggest that attachment 031-1 be reviewed and pared down. We understand it is a transfer of Appendix 8B1, but there is too much detail, in fact repeats some of the standards. It should be reduced.**
32.0	☒ R ☐ M Number	**Standard 032. RA should be changed to RC throughout the standard. In R1 it states that positions that meet one or both of the criteria have to be certified. That is NOT current policy. Both the compliance template P8T2 and Policy 8C use the word and, which means both. The drafting team has made a change here that should not be made.** **In the Periodic Review paragraph, the term Operating Authority should be changed to RC, TOP and BA.**
33.0	☒ R ☐ M Number	**Standard 033. For R7, we can not find the words in existing documents. Policy 9A1 is referenced but these words do not agree with that section or compliance templateP9T3.** **R8 should be rewritten to place the obligation on the BA's and TOP's to comply with the RC directives. The BA's and TOP's should be required to have the appropriate agreements with the other operating entities to carry out the directives of the RC. RA should be removed from this standard.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
33.0	☐ R ☐ M Number	**Standard 033. The first paragraph of the compliance monitoring process refers to operating entities. Operating entities in the first sentence should be changed to BA and TOP.** **Level 3 non-compliance should be reworded for clarity. We suggest the following…RC does not have the documentation demonstrating authority to direct all BA's and TOP's in it RC area to take necessary actions to return the system to a reliable state. The reference to SOL and IROl is too specific and not in P9T3.**
34.0	☒ R ☐ M Number	**Standard 034. Remove the reference to RA's in R2, R3 and R4.**
36.0	☒ R ☐ M Number	**Standard 036. Remove the reference to RA in R3.**
37.0	☒ R ☐ M Number	**Standard 037. In R4 and R8, remove the reference to RA. Also reword to place the responsibility on the RC to obtain the information required for the system studies. See our comment to question 11. In R5 we think the results of system studies should only be provided to BA's, TOP's and other RC's. Gen Operators may be merchant and providing them study results may violate confidentiality agreements.** **In R7, remove RA's and the reference should be to RCIS, not RAIS.**
38.0	☒ R ☐ M Number	**Standard 038. Remove RA from R3, R6, R8, R9, R13, R15, and R17. In draft 2 the old R17 was stricken (issuing directives in a cleaar, concise……). This needs to be put back in. The notes say it is in standard 029 but we do not find it anywhere else.** **The numbering of the last three requirements needs to be corrected.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
39.0	☒ R ☐ M Number	**Standard 039. Remove RA from the purpose. R2 should be reworded for clarity, we suggest…The RC experiencing a potential or actual SOL or IROL violation on the transmission system within its RC area shall, at its discretion….** **R2.1, R2.2 and R2.3 are really Regional Differences. We would suggest moving these to that section and rewording as needed.** **The reset period statement is redundant to the compliance reset period statement.**
40.0	☐ R ☐ M Number	**Standard 040. In R1, R3, and R4, RA should be replaced with TOP and BA. RA should be removed from R5.**
51.1	☒ R ☐ M Number	**Standard 051.1, R1-2 Instead of stating….provide written summary, state develop since R1-3 tells to provide it to the compliance monitor.** **This same comment applies to 051.2, R2-2 and 051.3, R2-3.**
52.1	☐ R ☐ M Number	**Standard 052.1. The drafting team has changed the Compliance Monitoring Responsibility from NERC to Unaffiliated Third Party. We do not agree with that change and have indicated this is a show stopper in our response to question 11. The compliance monitor for RRO requirements should remain NERC.** **This comment applies also to Standards 054.1, 054.2, 054.3, 055.1, 055.2, 056.1,056.2, 057.1, 058.2, 058.4, 058.5, 058.6, 061.1, 067.1, 069.1, 069.2, 069.3, 070.1**
57.0	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
61.0	☐ R ☐ M Number	
68.0	☐ R ☐ M Number	
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COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Kathleen Davis**	
Organization:	**Tennessee Valley Authority**	
Telephone:	**423-751-6172**	
Email:	**kadavis@tva.gov**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☒ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **Transmission Power Supply**

Lead Contact: Chuck Feagans

Contact Organization:

Contact Segment: 1

Contact Telephone: 423-751-4439

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*
Tim Ponseti			
Larry Akens			
Chuck Feagans			
Edd Forsythe			
Larry Goins			
Stuart Goza			
Bob Dalrymple			
Mitch Needham			
Byron Stuart			

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

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☒ Agree.

☐ Disagree.

Comments
TVA does not support the concept that RA equals RC.
TVA does not feel that both RA & RC should be included in Version 0 - it needs to be one or the other.
TVA feels that the RC should be in Version 0 where it applies to Policy 9 and therefore the RA needs to come out of Version 0 at this time.
Where RA is used in Version 0, outside of Policy 9, it should be replaced with Transmission Owner, Transmission Operator, or Balancing Authority as appropriate.
Leave implementation of the RA concept to future versions.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

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☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
In order to solve industry confusion, leave RA out of the model.
Make the Reliability Coordinator responsible for Policy 9 in Version 0.
Transmission Owner, Transmission Operator and/or Balancing Authority should replace the RA for applicable policies outside Policy 9.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

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Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments
TVA Agrees, if you eliminate the word "these" in the above response.
For clarification, all guides should be labled "Should be considered" as opposed to "shall be considered".

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

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- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments
They should be proposed as new standards, using the Urgent Action SAR process as appropriate.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Reliability Authority	☒ Delete ☐ Add ☐ Modify	
Reliability Authority Area	☒ Delete ☐ Add ☐ Modify	
Transmisson Owner	☐ Delete ☒ Add ☐ Modify	**acronym TO** **this is often used to refer to the Transmission Operator**
Transmission Operator	☐ Delete ☒ Add ☐ Modify	**TOP** **so as not to be confused with Transmission Owner**
Reliability Coordinator	☐ Delete ☐ Add ☒ Modify	**to reflect modifications made based on comments to remove BA from Version 0**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
However, there is still a lot of flux in the functional responsibilities and their acronyms

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

We feel that inclusion of both RA & RC creates confusion.
Phase III & IV Planning Standards shouldn't be included in the third draft of Version 0.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

We appreciate all the time and hard work of the Standards Drafting Team and all others who made contributions to this process.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
20.0	☒ R ☐ M Number 2.0	**Remove "Reliability Coordinator". RC does not own or operate generation. BA has a capacity and energy emergency plan. RC implements EEA process.** **RA needs to come out.**
20.0	☒ R ☐ M Number 4.0	**Insert after Reliability Coordinator, "who has a Balancing Authority"**
20.0	☐ R ☒ M Number 1.0	**Delete "Reliability Coordinator"3 times** **Delete "Reliability Authority" 3 times**
20.0	☐ R ☐ M Number	**Attachment 020-1 - replace "Operating Security Limits" with "System Operating Limits" throughout the attachment**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
22.0	☐ R ☐ M Number	**Attachment 022-1 - replace "Operating Security Limits" with "Interconnected Reliability Operating Limit" .**
27.0	☒ R ☐ M Number 10.0	**5.c To be consistent with Standard 040 R5, this requirement needs to be modified to state that the Reliability Coordinator approval must be obtained prior to resynchronization of major islands**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☒ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☒	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☒	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **Control Area Operations / Transmission Operations**

Lead Contact: Doug Hils

Contact Organization: Cinergy

Contact Segment: 1

Contact Telephone: 513-287-2149

Contact Email: Doug.Hils@cinergy.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Doug Hils	Cinergy	ECAR	1
Larry Conrad	Cinergy	ECAR	3
Walt Yeager	Cinergy	ECAR	6

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Until it is clear what the responsibilities are and who is responsible i.e., Transmission Operator or Reliability Authority both need to remain in Version 0 as written. For instance how an IROL is calculated and who should calculate is not clear at this time. Further more, adopting a standard where all responsibilities are applied to the Transmission Operator would only confuse a situation for those companies who turned over functional control of their transmission system to an RTO. Until such time exists where all responsibilities are known and who those responsibilities resides the standard should remain as currently written.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

There needs to be some definition on whether the standards are for the current hour forward or are they for the next hour forward?

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☒ Do not agree with dropping these planning standards from Version 0.

Comments

We strongly urge the SDT to consider retaining Requirements 1 through 3 of standard 59 which relates to generator testing of MW and MVAR capability and Requirements 1 through 4 of Standard 65 that relates to AVR operation and reporting and to generator voltage/reactive schedules. The NERC blackout recommendations cited the importance of reactive resources and verification of those resources

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

All sections should go to the JIC

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections should go to the JIC

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections should go to the JIC

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments
Even though a Transmission Owner could function as a Distribution Provider for customers connected directly to the transmission system, the requirements of Standard 060 applies to Transmission Owner so it would cover those situations.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Tagged	☐ Delete ☒ Add ☐ Modify	**The submittal of an E-Tag in accordance with all of the rules of the E-tag 1.7 spec.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
20.0	☐ R ☐ M Number 2.4	**States, "Evaluating and mitigating…review all "Operating Security Limits"…" Should these read "Security Operating Limits (SOL)"?**
20.0	☐ R ☐ M Number 2.4.4	**"Operating Security Limits"…" Should these read "Security Operating Limits (SOL)"?.**
20.0	☐ R ☐ M Number 2.6	**States, "Before declaring an Alert 3, the Energy Deficient…" Should this read Before "requesting" an Alert 3… The Energy Deficient Entity requests the declaration of an Alert, whereas the Reliability Authority declares the Alert.**
20.0	☐ R ☐ M Number 3.4	**States, "…Energy Deficient Entity who has declared an Energy Emergency... Once again as above, this should read, "…Energy Deficient Entity who has "requested declaration of" an Energy Emergency…" Also uses "Operating Security Limits". As stated above should this be Security Operating Limit (SOL)?**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
20.0	☐ R ☐ M Number 3.4	**Also uses "Operating Security Limits". As stated above should this be Security Operating Limit (SOL)?**
20.0	☐ R ☐ M Number 3.5	**States, "…shall notify its respective Reliability Authority and downgrade the Alert." It should read "…shall notify its respective Reliability Authority "to" downgrade the Alert." The EDE does not declare or downgrade the Alerts. Also uses "Operating Security Limits". As stated above should this be Security Operating Limit (SOL)?**
20.0	☐ R ☐ M Number 3.5	**Also uses "Operating Security Limits". As stated above should this be Security Operating Limit (SOL)?**
23.0	☒ R ☐ M Number 1.0	**States, "…shall have procedures for making operating…". Should read, "shall have procedures for "the recognition of and for" making operating…".**
25.0	☒ R ☐ M Number 6.0	**Change to read: The Reliability Authority, Transmission Operator, and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall make emergency plans available to its Reliability Authority and Reliability Coordinator. The Reliability Authority shall make emergency plans available to its Reliability Coordinator and neighboring Reliability Authorities.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
25.0	☒ R ☐ M Number 6.0	**Providing copies of emergency plans to the TO, BA, & RC could result in Cyber & Homeland Security issues. Many plans contain confidential & proprietary information. Cinergy has 7 emergency plans and 11 interconnects, 1RC for a total of 84 copies. AEP has 18 interconnects. MISO would receive copies of emergency plans from 25 entities times the number of plans per entity.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

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Draft 2 of Proposed Version 0 Reliability Standards

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Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization: **Bonneville Power Administration Transmission Business Line**		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☒ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **Bonneville Power Administration Transmission Business Line**

Lead Contact: Tracy Edwards

Contact Organization: BPA

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Additional Member Name	Additional Member Organization	Region*	Segment*
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Paul Arnold	BPA	WECC	1
Jamie Murphy	BPA	WECC	1
Richard Spence	BPA	WECC	1
John Anasis	BPA	WECC	1
Mike Viles	BPA	WECC	1
Jon Daume	BPA	WECC	1
Carson Taylor	BPA	WECC	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

The Version 0 standards should include both the RC and the RA. It will be up to the Regions as to how they register the functions. That registration will determine who has responsibility for certain standards and tasks. Tasks can be delegated to the RC by the control areas as is currently done through agreements between the control areas and Reliability Coordinators. In fact, keeping existing agreements in place is extremely important in providing continuity as we move toward implementation of the functional model. Given the situation at the IMO, where they perform the Reliability Coordinator function, and apparently want to be the single Reliability Authority, I believe that they can accomplish that by keeping appropriate agreements in place granting them that authority. I have been a proponent of having both the RC and the RA in the standards because we were told after draft 1 that it was expected that only the Reliability Coordinators would register as Reliability Authorities. That would simply not work for us since, as a control area, we already perform most of the tasks listed under the Reliability Authority function and delegate the remaining tasks to the Reliability Coordinator through an agreement. Thus having only the RA in the standards created confusion and implied that all reliability tasks listed under the Reliability Authority must be performed by the Reliability Coordinator. That kind of direction would have forced the issue of changing the fundamental structure and agreements that are already in place. NERC should not dictate the industry structure for implementing the functional model. Including both the RA and the RC in Version 0 allows maximum flexibility for the regions to begin implementing the functional model without having to change basic agreements or organizational structures. Today, information was received from two different sources that the NERC Board of Trustees tried to resolve this issue by agreeing to retain the Reliability Coordinator and eliminate

the Reliability Authority from the standards. This resolution is acceptable as long as the current structures and agreements can stay in place and that this would be considered as a interim solution while a more unified approach towards implementation of the functional model can be identified. NERC should place a high priority on finding a permanent solution and task the various committees to develop a functional model implementation plan that would guide further development of standards.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

As the version 0 standards near completion, a matrix of which standards apply to each function should be developed. Experience with the standards and compliance monitoring can provide future direction on how to modify the standards and if necessary, the functional model.

If it is decided that the Reliabilaity Authority be eliminated from Version 0, then assigning transmission system responsibilities to the Transmission Operator and Balancing Authority would be acceptable, until a detailed functional model implementation plan is developed. This approach will also create confusion, however, since it is still not a true implementation of the functional model.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

Applicable guides should be published in a separate document. Some of the guides are applicable today and some are in serious need of updating. Since they are not standards, and thus not enforceable, they should not be included in the standards.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☒ Do not agree with dropping these planning standards from Version 0.

Comments

Removal of some of the standards that were listed in the August 14 Blackout Recommendations as possible violations is unacceptable. Old Planning Standards I.D.S1; II.B.S1 and S2; and 3.C.S1 and S2 were listed as possible standards violations that contributed to the Blackout. These standards must be included in the Version 0 standards. Waiting for a Urgent action SAR to rememdy the issues that came up in field testing and having no standard is in place in the meantime is not acting responsibly. This is a show-stopper for approval of the Version 0 standards for BPA.

We also heard that the Board decided to drop Phave III and IV standards from version 0 and resolve this issue in May of 05. Once again, this may be acceptable as a interim solution to the debate, as long as there is a process to quickly resolve this among the industry. There is however significant risk that those involved in grid planning will be getting mixed messages about which standards are necessary to follow.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

Yes, but not in Version 0. It will be extremely important to maintain continuity of existing standards and practices in version 0. NAESB business practices should be determined and developed in version 1.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
Yes, but not in Version 0. It will be extremely important to maintain continuity of existing standards and practices in version 0. NAESB business practices should be determined and developed in version 1.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
Yes, but not in Version 0. It will be extremely important to maintain continuity of existing standards and practices in version 0. NAESB business practices should be determined and developed in version 1.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments

NERC standards are to apply to the Bulk Transmission System. While there are issues with the definition of the Bulk Transmission System, it clearly does not include distribution systems. the only exception is that any facility that impacts an IROL or SOL should be included.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	**Cannot see terms**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Could go either way on this, but it might be prudent to wait on a numbering scheme until an assessment is made on how future standards, i.e., version 1 standards will fit.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Would approve Version 0 standards only if old standards I.D.S1; II.B.S1 and S2; and 3.C.S1 and S2 are included. This is a show stopper.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

The elimination of old Standards I.D.S1; II.B.S1 and S2; and 3.C.S1 and S2 from Version 0 would cause BPA to vote against approval.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.4	☒ R ☐ M Number -41.0	**In Requirement R4-1, the first paragraph of this new standard says to test a number of each of the extreme contingencies while the old standard says to evaluate only those that would produce the more severe system impacts (the first bullet in item c of this requirement has the correct wording). This language should be corrected to be consistent.**
58.5	☐ R ☒ M Number 5.1	**Measure M5-1 Measure should not be that the RRO has evidence that it contributed to the development of cases but rather that the cases are available and solved so that the measure matches the Compliance Levels.**
58.6	☐ R ☒ M Number -61.0	**Measure M6-1should not be that the RRO has evidence that it contributed to the development of the models but rather that the models are available and solved and included no errors so that the measure matches the Compliance Levels.**
60.1	☒ R ☐ M Number	**Requirement R1-1, item a should included the words -as applicable for each owner- after the words -the items listed-. Not all owners will have all the pieces of equipment listed.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
60.1	☒ R ☐ M Number	**Requirement R1-1 also includes the requirement for Generator owners to provide data. However the list does not include any generation equipment. Although information on the generation equipment is necessary, it is not included in the existing standard. This needed information should be flagged as missing for the Transmission Plan SAR 500 Team to address.**
8.0	☒ R ☐ M Number 1.0	**The RA should not be spending there time informing the RC, they should be too busy actually trying to get under the limit. The RC should know by their monitoring that an IROL or a SOL has been exceeded. I would agree with the RA informing the RC what actions have been or will be taken if they have exceeded the limit for over 30 minutes.**
8.0	☐ R ☒ M Number 3.0	**Give an example of how you would show evidence something was evaluated. This does not seem like a possible measure. Also the RC may not have needed to give any additional direction and would therefore not have any evidence as required by the measure.**
8.0	☐ R ☐ M Number	**Purpose: The last sentence of the purpose statement should read _Violations lasting longer than 30 minutes are also reported to the compliance program.**
8.0	☐ R ☐ M Number	**Compliance Monitoring Process: (first paragraph, second sentence) If this sentence were true the violation would have been an IROL to begin with. Give an example of this scenerio.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
8.0	☐ R ☐ M Number	**Compliance Monitoring Process: (bullets following the first paragraph) 2) … Is vague and not measureable 3) … Would not nessarly make it an IROL. 4) … Would not nessarly make it an IROL. 5) … Is vague and there is no unacceptable loss of load definition for NERC that is measurable**
9.0	☒ R ☐ M Number 1.0	**Appears to give Transmission Operators responsibilities outside of their area of authority. This could cause a conflict.**
9.0	☒ R ☐ M Number 2.0	**Define _voltage levels_. Clarify if this applies toTransmission only, or Transmission and Distribution.**
9.0	☒ R ☐ M Number 3.0	**Clarify if this applies to generator operators.**
9.0	☒ R ☐ M Number 5.0	**Reactive resourses that cover _first contingency_ only sounds incomplete. It should cover first contingencies and multiple contingencies where these have a high probability of occurring. The term _high probability_ would then be defined.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
9.0	☒ R ☐ M Number 6.0	**The 30 minute requirement conflicts with others: like the 20 min for OTC violations.**
9.0	☒ R ☐ M Number 7.0	**I'd like to expand this to include UF and Volts per Hertz protection relays as well.**
9.0	☒ R ☐ M Number 9.0	**This seems to take away from the Transmission Operators capability to respond on their own.**
15.0	☒ R ☐ M Number 1.0	**Data is needed for more than just monitoring. Add _for operation and monitoring of the system.**
15.0	☒ R ☐ M Number 2.1	**Add _within the RC area_ to the end of this sentence.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
15.0	☐ R ☐ M Number 2.0	**Attachment 015-1: Need a time frame for this data, it is not measurable as it reads now.**
63.0	☐ R ☐ M Number	**I thought that version 0 was just a reformatting of the old standards. But it appears some standards have been omitted. For transmission protection, 063, the old standard III.A.S2 that required sufficient redundancy to eliminate a single point of failure has been omitted. There is something similar to this for the special protection /RAS standards but not for line protection. I think this should be included. Lack of redundancy was critical to the June 14, 2004 Westwing disturbance in WECC.**
24.0	☐ R ☐ M Number	**Remove the words (to be prepared) from the first sentence of the Purpose. Current operating plans and procedures implies they have been prepared, implemented and are up to date.**
7.0	☒ R ☐ M Number 5.0	**R5 indicates that every effort shall be made to remain connected to the Interconnection. However the second sentence of the requirement implies that it may be acceptable to disconnect from the Interconnection if there is imminent danger of violating an IROL or SOL. There can be other conditions other than violating IROL's or SOL's that place the system at great risk. In fact, violating an IROL or SOL in itself does not necessary mean the system is at imminent risk. Continued**
7.0	☒ R ☐ M Number 5.0	**Continued I would hope that no one would consider opening an Interconnection just because of an imminent danger of violating an IROL or SOL. The bottom line is the Reliability Authority and Transmission Operators need to be able to take actions as they deem necessary to protect their area independent of whether an IROL or SOL is in imminent danger of being violated. Continued**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
7.0	☒ R ☐ M Number 5.0	**Continued Therefore, change the second sentence of R5 to read as follows: The Reliability Authority or Transmission Operator may take such actions as disconnecting from the Interconnection, as it deems necessary, to protect its Area.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Gerald Rheault**	
Organization:	**Manitoba Hydro**	
Telephone:	**204-487-5423**	
Email:	**gnrheault@hydro.mb.ca**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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☐ Agree.

☒ Disagree.

Comments

The intent of any Reliability Standard developed in the NERC process is that the duties assigned to any entity in the Standards should reference the functional entities contained in the Functional Model . The Reliability Coordinator is not referenced in the Functional Model and therefore should not be referenced in the Version 0 Standards.

The Functional Model was developed to define the functions required to ensure that the bulk electric system is planned and operated in a reliable manner and to facilitate the development of a revised organization structure that better meets the needs of the unbundled electric transmission industry of today.

The industry debate about RC and RA is consuming a lot of time and effort and is confusing to many industry players. The Reliability Coordinator is an entity which was developed in pre Functional Model time frame to address certain shortcomings in the existing reliability procedures which were in place. The Functional Model, with the RA function, is intended to become the procedural reliability model complimenting the Reliability Standards which are presently being developed. These two functional entities were not intended to apply in the same space-time continuum and the present debate is very confusing and counterproductive to the whole Reliability Standards development process. The concerns that some entities have relative to the difference in functionalily between these two entities should be addressed because it could be an issue in overall implementation of the Functional Model.

NERC and the industry should endeavour to resolve the concerns relative to this RC function in a timely fashion and move on to implementing the Functional Model. If the issues relative to the difference in scope between the RC and the RA cannot be resolved then NERC may be required to

modify the Functional Model to bring it in line with industry reality. One option would be that the Functional Model taskgroup revise the Functional Model to allign the RA scope to be the same as the present RC scope and assign the other RA tasks to other entities such as the TOP. This would allow the industry to move forward and still ensure that all Version 0 Standards map to the Functional Model. Version 0 Standards should not be posted for ballot till this issue has been resolved.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

The Version 0 Standards must be referenced to the Functional Model. If there are difficiencies in the Functional Model they should be addressed immediately and a revised Functional Model approved before Version O Standards are approved and implemented. This link is required to ensure that the Standards can be implemented in a clear and concise manner.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

The intent of the Version 0 exercise was to translate existing policy; therefore to expedite the process, the version 0 SDT should follow this original intent. Any deficiencies should be addressed as part of Version 1 Standards development.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

The Version 0 Standards should include only the elements that are to be included in the Standard itself. This will simplify the process of approving the Standard and minimize the need to modify the Standard.

Having supporting documnts to help clarify and implement the Standard is a good idea but they should be issued on their own not to be confused with the Standard and to make it easier to change them if required. This will also help to emphasize that these guides are only to be used in a support mode to the Standard and not mandatory in themselves.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

There is no point in including these Standards as part of the Version 0 package being reviewed at present because of the deficiencies which were stated above. To include these Standards in Version 0 would create problems for the industry and for the compliance programs and could lead to the total Version 0 package being rejected in balloting.
The best way to deal with these Standards is to put them through the Standards development Process as urgent action SARs, as suggested by the SDT, so they can be properly developed.
Some of the Standards included in Phase III and phase IV are important reliability elements which should be implemented as Standards asap.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 054 should continue to be apart of Version 0 because the entire Standard is needed for reliability reasons. However we recognize that Section 054.3 has aspects which could be part of a NAESB Business Practice.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
Standard 055.3 should be a NAESB business practices because it is concerned with equity in regard to the use of CBM and deals primarily with business issues. It should be provided to the Joint Committee for review and resolution.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
Portions of Standard 056.1 should not be a NERC Reliability Standard but a NAESB business practice. In section c, under R1-1, there is a list of of items which may be included in TRM. Specifying what uncertainty can be included in TRM is an equity issue that is more suitable to a business practice. An other element which could be a business issue is the reference "any additional component of uncertainty shall benefit the interconnected transmission system as a whole before they shall be permitted to be included in the Transmission Reliability Margin calculations". This statement is clearly an equity issue and not a reliability one. R1-1d requires a description of the conditions under which TRM is available to the market as non-firm transmission service which is a business practice.
Therefore R1-1c&d of 056.1 should be eliminated from the reliability Standard and forwarded to the JIC for consideration as a business practice.

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

These Standards are being developed to ensure the reliability of the bulk electric system at voltages of 100Kv and above. These are the entities for which NERC has traditionally been responsible for and for which the existing policies and Standards were developed. The distribution function of the utility industry did have to operate according to NERC policies unless an element of the distribution system could impact the performance of the transmission system. Then that element of the distribution system would have to comply with NERC requirements. Therefore it would not be appropriate to make this Standard applicable to Distribution Providers. There may be instances where some sub-transmission or distribution facilities can impact the transfer capability of a regional transmission facility such as a flowgate. These facilities should then be included in the list of facilities which must comply with Standard 060 even if the overall distribution system is not required to comply.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Balancing Area	☒ Delete ☐ Add ☐ Modify	**It is a repetition of and has the same definition as the Balancing Authority Area and therefore is redundant and serves no purpose.**
Burden	☒ Delete ☐ Add ☐ Modify	**This definition does not effectively describe the act of operating outside the acceptable boundaries of the system and is difficult to understand.**
Cascading	☐ Delete ☐ Add ☒ Modify	**The words"beyond an area predetermined" should be repaced by "beyond an area predicted".**
Compliance Monitor	☐ Delete ☐ Add ☒ Modify	**should read"Function which monitors performance of the responsible entities to the reliability Standards".**
Generation Load Distribution Factor	☐ Delete ☐ Add ☒ Modify	**The section of sentence "LSF to determine to total" should be changed to "todetermine the total"**
Native Load	☐ Delete ☐ Add ☒ Modify	**the definition provided for Native Load Customer applies here instead of the one presented.**
Native load Customer	☐ Delete ☐ Add ☒ Modify	**the definition provided for Native load applies here instead of the one presented.**
Reliability Coordinator	☒ Delete ☐ Add ☐ Modify	**This term does not belong here since it has not been defined in the Functional Model and only serves to confuse the industry on the responsibilities of the RA**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

The current numbering scheme has many deficiencies. However on initial review, the proposed new numbering scheme also has many deficiencies associated with it. The acronyms proposed are incomplete, are inflexible and do not intuitively describe the Standard area of responsibility. Therefore Manitoba Hydro believes that to avoid further confusion the numbering scheme should not be tampered with at the present time.
Once the Version 0 Standards are approved, a revised numbering scheme could be posted subject to review and comment . Once a concensus is developed with the industry stakeholders then this new numbering scheme could be implemented for both Version 0 and Version 1 Standards.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

Based on our read of the Standards as they presently exist, Manitoba Hydro would vote against approval of the version 0 Standards. The Standards as presently drafted are confusing in their reference to both the RA and RC as well as reference to the regional reliability committee regional compliance monitor and operating committee. The RC , regional reliability committee and the operating committee are all entities referenced in the Version 0 Standards which are not included and defined in the Functional Model. NERC should resolve the issues surrounding the RC/RA controversy before these Version 0 Standards are balloted. If this is not the case then Manitoba Hydro will not not approve the Standards.

Question 11:

Are there any "show stoppers" in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

The showstoppers are the RA/RC issue and referencing of non Functional Model entities in the Version 0 Standards as discussed in comment to question 10. Manitoba Hydro will review any modifications made to the Standards in consideration of what is best to ensure the reliable operation of the bulk electric system. However the way in which NERC implements solutions to the concerns addressed in question 10 will weigh heavily on whether Manitoba Hydro will consider voting to approve the Version 0 Standards.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
0.0	☐ R ☐ M Number	**Manitoba hydro is submitting comments to the Standards 001to 020 in an attachment the email which was used to submit the comment form to NERC. This document is referenced as**
0.0	☐ R ☐ M Number	**MH Comment draft 2 version 0 standards2.**
58.5	☒ R ☐ M Number 5.1	**The RRO referenced here is not an entity identified in the Functional Model**
58.6	☒ R ☐ M Number 6.1	**The RRO referenced here is not an entity identified in the Functional Model**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
61.1	☒ R ☐ M Number -11.0	**The RRO which is not identified in the Functional Model is referenced in this Standard.**
	☐ R ☐ M Number	**The comment about the RRO is applicable in many of the planning Standards in Version 0.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

referred to areas
XX~~XX~~ corrections
XXXX comments

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
001	Purpose	To maintain Interconnection steady-state frequency within defined limits by balancing real power demand and supply (generation plus INTERCHANGE) in real-time. CPS1 and CPS2 are steady-state measurements as opposed to disturbance measurements.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
001	R1	**Appendix 1A:** "NIA accounts for all actual meter points that define the boundary of the CONTROL AREA and is the algebraic sum of flows on all tie lines. Likewise, NIS accounts for all scheduled tie flows of the CONTROL AREA." **Standard 001** NIA is the algebraic sum of actual flows on all tie lines. NIS is the algebraic sum of scheduled flows on all tie lines. There is no reference to the size of the area such as Control Area or Balancing Authority Area, these statements could be referring to the entire Eastern Interconnect. **Appendix 1A:** "The 10ß represents a CONTROL AREA'S frequency bias (ß's sign is negative)" (This is important information that should be included) "where ß is the actual frequency bias setting (MW/0.1 Hz) used by the CONTROL AREA and 10 converts the frequency setting to MW/Hz." **Standard 001** B is the actual frequency bias setting (MW/0.1 Hz) for the Balancing Authority area ~~The constant factor~~ and 10 converts the frequency setting to MW/Hz. By adding "The constant factor" you are making the statement more complicated instead of keeping it simple. **Appendix 1a** "IME is the meter error recognized as being the difference between the integrated hourly average of the net tie line instantaneous interchange MW (NIA) and the hourly net interchange demand measurement (MWh). This term should normally be very small or zero." **Standard 001** "IME is the meter error correction factor typically estimated from the difference between the integrated hourly average of the net tie line flows (NIA) and the hourly net interchange demand measurement (megawatt-hour). This term should normally be very small or zero." "Recognized as being" has a different meaning than "typically estimated". Should leave as original. "Instantaneous interchange" is much more specific than "flows".

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
001	R2	**Standard 001** $\sum_{10}$ is a constant derived from the targeted frequency bound. It is the targeted RMS of ten minute average frequency error from schedule based on frequency performance over a given year. The bound, $\sum_{10}$, is the same for every Balancing Authority Area within an Interconnection. Bi is the frequency bias of the Balancing Authority area and B_s is the sum of the frequency bias settings of the Balancing Authority Areas in the respective INTERCONNECTION. For Balancing Authority Areas with variable bias, this is equal to the sum of the minimum frequency bias settings. Standard 001 R2 did not define Bi and is inconsistent with referring to Balancing Authority Areas.
001	M1	**Standard 001** [PSRD C Calculation of Compliance 1.1] CPS1 ~~is calculated by~~ convert~~sing~~ a compliance ratio to a compliance percentage as follows: $CPS_1 = (2 - CF) * 100\%$ [PSRD C 1.1.1] The rating index $CF_{12\text{-month}}$ is derived…. [PSRD C 1.1.1.1] A clock-minute average is the average of the reporting Balancing Authority's valid measured variable (i.e., for ACE and for frequency error**)** (missing the close bracket) for each sampling cycle during a given clock-minute. [PSRD C 1.1.1.3] The reporting Balancing Authority shall be…. [PSRD C 1.1.2] In order to ensure that the average….. Improper references.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
001	M2	**Standard 001** [Policy 1A 2.2] Each Balancing Authority shall achieve, as a minimum, Requirement 2 compliance of 90% (CPS2). [PSRD **C** 1.2] CPS2 relates to a bound on the ten-minute average of ACE. A compliance percentage is calculated as follows: The Violations $_{\text{per month}}$ are a count of the number of periods that ACE $_{\text{clock-ten-minutes}}$ exceeded L_{10}. ACE clock-ten-minutes is the sum of valid ACE samples within a clock ten-minute period divided by the number of valid samples. Violation $_{\text{clock-ten-minutes}}$ Formatting of subscripts. [PSRD **C** 1.2.2] A condition may arise which [PSRD **C** 1.2.2.1] In order to ensure that the average PSRD C 1.2.2.1 is a subset of PSRD C 1.2.2 so it should be indented. [Policy 1 A 2.1] A Balancing Authority providing or receiving Supplemental Regulation Service through Dynamic Transfer shall continue to be evaluated on the characteristics of its own ACE with the Supplemental Regulation Service included. Improper references.
002	R2	R2 [Policy 1B 1.~~1~~2] Each Regional Reliability Organization, sub Regional Reliability Organization or Reserve Sharing Group…. R2.1 [Policy 1B 1.1] The same portion of resource capacity (e.g. reserves from jointly owned generation) shall not be counted more Improper references.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
002	R4	Standard 002 "R4 [Policy 1B 2.2] ……. The Disturbance Recovery Criterion is that each Balancing Authority or Reserve Sharing Group shall meet the DCS 100% of the time for Reportable Disturbances." Policy 1 B 2.2.1 **"DISTURBANCE RECOVERY CRITERION**. The CONTROL AREA shall return its ACE to zero if its ACE just prior to the DISTURBANCE was positive or equal to zero. For negative initial ACE values just prior to the DISTURBANCE, the ACE must return to its pre-disturbance value." The Disturbance Recovery Criterion is not that the BA or Reserve Sharing Group meet DCS 100% of the time, it's the returning of it's ACE to zero or pre-disturbance values. It should read "Each Balancing Authority or Reserve Sharing Group shall meet the DCS 100% of the time for Reportable Disturbances."
002	M1	M1 [PSRD C 2.] A Balancing Authority or Reserve Sharing Group shall calculate and report compliance with the Disturbance Control…..<br ~~Regions~~ Regional Reliability Organizations may, at their discretion, require a lower reporting threshold. Disturbance Control Standard is measured as the percentage recovery (R_i). M1 is missing the graph that depicts ACE < zero showing the recovery time. [PSRD C 2.1] Determination of MW_{LOSS}…. [PSRD C 2.2] Determination of ACE_A….. In the illustration to the right, the horizontal line represents an averaging of ACE for 15 seconds prior to the start of the Disturbance with a result of ACE_A = - 25 MW. The illustration is not to the right but below the next section. Should give graphs figure numbers. [PSRD C 2.3] Determination of ACE_M or ACE_m. [PSRD 2.3] Determination of ACE_M or ACE_m. $ACE_{~~m~~M}$ is the maximum value of ACE measured within fifteen minutes following a given disturbance. At the discretion of the Balancing Authority or of the Reserve Sharing Group, compliance may be based on the ACE measured fifteen minutes following the Disturbance, i.e., $ACE_M = ACE_{15\ min}$. Improper reference and incorrect ACE measure.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
002	**Compliance Monitoring Process**	Periodic Review: Each Balancing Authority or Reserve Sharing Group shall submit one completed copy of DCS Form, "NERC Control Performance Standard Survey – All Interconnections" to its Resources Subcommittee Survey Contact no later than the 10th…. Is this the correct committee? Data Retention: The data that support the calculation of DCS are to be retained in electronic form for at least a one-year period. If the DCS data for a Reserve Sharing Group and Balancing ~~Area~~ Authority are undergoing a review to address a question that has been raised regarding the data, the data are to be saved beyond the normal retention period until the question is formally resolved.
003	R2	R2 [Policy 1C S1.~~3~~1] Each Balancing Authority shall establish and maintain a Frequency Bias Setting that is as close….. R2.1 [Policy 1C S1.1.~~2~~1] The Balancing Authority may use a fixed frequency bias….. R2.2 [Policy 1C S1.1.~~3~~2] The Balancing Authority may use a variable… Improper references.
003	R3	R3 [Policy 1C S1.~~1~~] Each Balancing Authority shall operate its AGC… Improper references.
003	R4	R4 Policy 1C S1.1.3] Balancing Authorities that use Dynamic… Improper references.
003	R5	R5 [Policy 1C S1.1.4] Balancing Authorities….. R5.1 [Policy 1C S1.1.5] Balancing Authorities that do not….. Improper references.
004	R3	Policy 1 D Requirements 1.2 **1.2. Schedule offset.** If the frequency schedule cannot be offset, the CONTROL AREA may offset its net INTERCHANGE schedule (MW) by an amount equal…. Standard 004 R3 gives the Balancing Authority a choice to offset their frequency to correct time error or offset their interchange schedule by an equivalent amount. The Policy Says "If the frequency schedule cannot be offset" then it's okay to offset the interchange schedule. Implying the frequency offset should be attempted first. The standard leaves it up to the BA.
004	R4.1	Any RELIABILITY AUTHORITY in an INTERCONNECTION shall have the authority to terminate a time error correction in progress for reliability considerations. (change from original statement)

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
005	**Source References**	Policy 1 — Generation Control and Performance: Section ~~A~~E — Automatic Generation Control Standard Improper references.
005	R11	**Policy 1 E** **4.3.3. Interchange Ramps**. SCHEDULED INTERCHANGE values used in ACE shall include the effect of ramp rates, which are identical and agreed to between affected CONTROL AREAS. The standard eliminates the need to have the ramp rates identical.
005	R17	R17 [Policy ~~5~~1E 5.] Each Balancing Authority shall at least annually check and calibrate its time error and frequency devices against a common reference. [Policy 1 E 4.7.4] The Balancing Authority shall adhere to the minimum values for measuring devices as listed below: Improper references.
005	**Compliance Monitoring Process**	[Policy 1E 4.8.3.~~2~~1] Within one week upon request, Balancing Authorities shall provide NERC or the Regional Reliability Organization CPS source data…. Improper references.
008	M3	M3 [P2T~~1~~2] Evidence that the Reliability Coordinator evaluated actions.. Improper references.
008	**Source References**	Policy 2 — Transmission: Section A — Transmission Operations Compliance Template P2T1 Compliance Template P2T2 Improper references.
009	R3	R3 Policy 2B 2.1] Each Purchasing-selling Entity shall arrange for (self-provide or purchase) reactive resources to satisfy its reactive requirements identified by its Transmission Service Provider. The policy doesn't specify the reactive requirements are being "identified by it's Transmission Service Provider."

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
009	R5.1	**Policy 2 B** **3.2.1. Location.** Reactive resources shall be dispersed and located electrically so that they can be applied effectively and quickly when contingencies occur. **Standard 009** R5.1 [Policy 2B 3.2.1] Each Transmission Operator shall disperse and locate its reactive resources so that the resources can be applied effectively and quickly by the Transmission Operator when contingencies occur. The wording should be changed back to the original wording in the policy. I know it doesn't mean this: *The Transmission Operator cannot physically move reactive resources, all he can do is request reactors, capacitor, etc. be installed in appropriate locations. The location of reactive resources is done by planning.* But that's the impression it leaves.
016	R1.1	R1.1 [P4T4] Each Generator Operator shall provide outage information daily to its Transmission Operator for scheduled generator outages planned for the next day (~~any foreseen outage of a generator~~ greater than 50 MW) that may collectively cause or contribute to an SOL or IROL violation or a regional operating area limitation. The Transmission Operator shall establish the outage reporting requirements. This standard talks about planned outages only, not unforeseen outages.
016	R1.2	R1.2 [P4T4] Each Transmission Operator shall provide outage information daily to its Reliability Authority, and to affected Balancing Authorities and Transmission Operators for scheduled generator and bulk transmission outages planned for the next day (any ~~foreseen outage of a~~ transmission line or transformer greater than 100 kV or generator greater than 50 MW) that may collectively cause or contribute to an SOL or IROL violation or a regional operating area limitation. The Reliability Authority shall establish the outage reporting requirements. This standard talks about planned outages only, not unforeseen outages.
016	R1.3	R1.3 [P9T1] Such information shall be available by 1200 Central… Improper references.
017	**Source References**	Policy 4 - System Coordination: Section ~~B~~D - System Protection Coordination Improper references.
017	R6	R6 [Policy 4D 6.] Each Transmission Operator and Balancing Authority shall monitor the status of each Special Protection System in their Area, and shall notify ~~all~~ its Reliability Authority, and affected Transmission Operators and Balancing Authorities of each change in status.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
018	**Purpose**	To ensure reliability entities have clear decision-making authority and capabilities to take appropriate actions or direct the actions of others to return the transmission system to normal conditions during an~~d~~ emergency.
019	**Purpose**	**Policy 5 B** The OPERATING AUTHORITY shall have communications (voice and data links) to appropriate entities within its OPERATING AUTHORITY AREA, which are staffed and available to act in addressing a real time emergency condition. **Standard 019** To ensure Reliability Authorities, Balancing Authorities, Transmission Operators, and Generator Operators have adequate communications and that these communications capabilities are staffed and available for addressing a real-time emergency condition. In Policy the "which are staffed" is referring to the "appropriate entities". The standard has changed that to staff the "communications capabilities". This should be reworded to reflect the original meaning. The following is an email explaining the intent of Policy 5B. Email from Larry Kezele, Manager Operating Reliability and Market Services "I am responding to your question to NERC regarding the intent of policy 5B. The essence of the requirement is to ensure that operating authorities can communicate with those entities within its area during emergency situations. Thus the 24 hours per day requirements. As such any entity within the operating authority's area that may be responsible for providing assistance in responding to the emergency must be staffed for 24 hour per day operation. **In other words, the 24 hour per day requirement is on the operating entity and not the communications system provider.**"
019	R2.1	R2.1 [Policy 5B 2.1.1] The Reliability Authority or Balancing… R2.2 [Policy 5B 2.1.2] The Reliability Authority or… R2.3 [Policy 5B 2.1.3] The Reliability Authority… R2.4 [Policy 5B 2.1.4] The Reliability Authority, Transmission… Improper references.
020	R6	R6 [Policy 5C 2.2] A deficient Balancing Authority… Improper reference.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
020	R7, R8	**Standard 020** R7 [Policy 5C 2.1] If the Balancing Authority cannot comply with the Control Performance and Disturbance Control Standards, then it shall immediately implement remedies to do so. These remedies include, but are not limited to: a) Loading all available generating capacity. b) Deploying all available operating reserve. c) Interrupting interruptible load and exports. d) Requesting emergency assistance from other Balancing Authorities. ~~e) Declaring an Energy Emergency through its Reliability Coordinator; and~~ ~~f) Reducing load, through procedures such as public appeals, voltage reductions, curtailing interruptible loads and firm loads.~~ R8 [Policy 5C 2.1] Once the Balancing Authority has exhausted the steps listed in Requirement 7, or if these steps cannot be completed in sufficient time to resolve the emergency condition, the Balancing Authority shall: R8.1 [Policy 5C 2.1.1] Manually shed firm load without delay to return its ACE to zero; and R8.2 [Policy 5C 2.1.2] Request the Reliability Coordinator to declare an Emergency Energy Alert in accordance with Attachment 020-1 "Energy Emergency Alert Levels." R7 e) and f) are repeats in R8.1 and R8.2.
020	R8.2	R8.2 [Policy 5C 2.1.2] Request the Reliability Coordinator to declare an ~~Emergency~~ Energy Emergency Alert in accordance with
020	R9	R9 [Policy 9F ~~7.6~~ and P5T1] A Reliability Coordinator that… Improper reference.

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Alan Johnson**	
Organization:	**Mirant**	
Telephone:	**(678) 579-3108**	
Email:	**alan.r.johnson@mirant.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☐	1 - Transmission Owners
☐ ECAR	☐	2 - RTOs, ISOs, Regional Reliability Councils
☐ FRCC	☐	3 - Load-serving Entities
☐ MAAC	☐	4 - Transmission-dependent Utilities
☐ MAIN	☐	5 - Electric Generators
☐ MAPP	☒	6 - Electricity Brokers, Aggregators, and Marketers
☐ NPCC	☐	7 - Large Electricity End Users
☐ SERC	☐	8 - Small Electricity End Users
☐ SPP	☐	9 - Federal, State, Provincial Regulatory or other Government Entities
☐ WECC		
☐ NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

I concur with the decision to continue the use of the RC in the Version 0 reliability standards. Doing so should eliminate some of the concern expressed in the industry. However, in going down this path, I don't believe that we should utilize the FM Reliability Authority entity. I believe that doing so creates significant confusion. Use one or the other, not both.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

None of the above. Only the RC should be used in Version 0 with local reliability responsibility assigned to the Transmission Operator.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

I'm not supportive of the idea of using RC and RA within the same standard. Further, alternative B, although a move in the right direction, represents a significant change from existing policy which really makes it more appropriate for consideration under Version 1.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

Don't want to see the guides lost, so can accept them as being attachments to the standard on a case by case basis. However believe that a better solution would be to simply collect all of the guides in a Guide book. My concern with including them as attachments to the standard is that the guides will be perceived as standards when they are instead intended to be best practices.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections. The development of capacity benefit margin is a business issue and thus should be developed in the NAESB forum.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
Section 056.1

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Okay with changing the numbering scheme now. Would like to see an additional identifier to indicate whether the standard is a planning or operating standard. Also, would like to see some type of identifier that indicates whether there is a companion business practice developed by NAESB.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments
Need to settle on either RA or RC. Can't use both.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
The use of the RA and the RC within the Version 0 standards is a potential show stopper.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
001	☒ R ☐ M Number 1.0	**In the second paragraph, the word "bound" is replaced with "bandwidth". For consistency and clarity, suggest retaining "bound".**
001	☐ R ☒ M Number 2.0	**In several places subscripts were not used, making language tough to follow. For example, in the paragraph which references PSRD 1.2.1 reads: …same factors that limit total periods per month will limit violations per month." It should read: …same factors that limit Total Periodsmonth will limit Violationsmonth", with "month" as a subscript to be consistent with the equation to which the text refers.**
001	☒ R ☐ M Number	**In the Process section on page 5, the last two paragraphs were deleted. They appear to be existing reporting requirements (shall statements). They should be captured as a requirement (R5?).**
001	☐ R ☐ M Number	**Under the Levels of Non Compliance section, Balancing Area should be replaced with Balancing Authority Area, a defined term under the NERC Functional Model.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
5.0	☒ R ☐ M Number 1.1	**This requirement is a significant deviation from the existing standard, which is applicable to the Balancing Authority. How does the GOP, TOP or LSE ensure that the BA has included its generation, transmission or load in the BA's calculations? With the text contained in R1, R1.1 R1.2 and R1.3 are not necessary.**
006	☒ R ☐ M Number 4.0	**Per the draft Glossary, Off Peak is defined as Those hours or other periods defined by NAESB business practices, contract, agreements, or guides as periods of lower electrical demand. Don't believe this is clear enough. The existing definition is more specific and is found in Appendix A of the NAESB Inadvertent Interchange Standard. Believe it will be much clearer to cite the specific NAESB business practice in the requirement, rather than relying on a general definition found in the glos**
007	☒ R ☐ M Number	**With the decision to use RC in lieu of RA in standards 33-40, believe that the RA should not be used at all in Version 0. It is confusing to have both the RA and RC within the same standard set. As such recommmend replacing references to RA with RC in this standard**
007	☒ R ☐ M Number 1.0	**Although I agree with the requirement, it is a stretch from what Policy 5A requirement 1 currently says.**
007	☒ R ☐ M Number 2.0	**For clarity, suggest modifying the requirement to read as follows: Each Reliability Coordinator and Transmission Operator shall operate the transmission system …**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
007	☒ R ☐ M Number 5.0	**Believe that this translation of Policy 5A, requirement 7 is too restrictive. In this case, believe that the translation of OA should extend to the GOP. Also, it doesn't make sense to include the RA within the requirement because the RA is not an operator of equipment (e.g. generators, transmission facilities) connected to the transmission system.**
008	☒ R ☒ M Number	**With the decision to use RC in lieu of RA in standards 33-40, believe that the RA should not be used at all in Version 0. It is confusing to have both the RA and RC within the same standard set. As such recommmend replacing references to RA with RC in this standard**
009	☒ R ☐ M Number 3.0	**This requirement appears to be more of a business practice than a reliability standard.**
009	☒ R ☐ M Number 4.0	**In the first sentence of the requirement, suggest replacing its capacitive with the capacitive in recognition of the fact that the TOP doesn't own all inductive reactive resources within its Area.**
010	☒ R ☐ M Number 4.0	**Should include the reference to the E-Tag spec in P3 A requirement 2 within this requirement. Requirements 10-13 for some reason avoid references to E-Tag. Are we relying on the NAESB reference to the use of E-Tag as the prefered method for transmitting a tag? How do we ensure that transaction information makes its way into the IDC without the use of E-Tag?**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
010	☐ R ☒ M Number 1.0	**The addition of within the Balancing Area to this measure is a new requirement and should not be included in Versio 0.**
010	☐ R ☐ M Number	**Why isn't the non-compliance section of P3T3 not included as part of this standard?**
010	☒ R ☐ M Number 4.0	**Comments regarding Attachment 010-2: 12. Should read Transmission Reservation Number; 17. Suggest more specificity than Contact Person. Need telephone, fax, etc.; suggest adding 21. A description of the necessity for the scheduling change.; suggest adding 13a. Transmission Reservation Profile (2.1.2.2.3)**
011	☒ R ☐ M Number	**Remove references to Reliability Authority**
011	☒ R ☐ M Number 3.0	**Looks like an attempt was made to provide some clarity by creating items b and c, which is one bullet in the current standard. Find the split to be more confusing and unclear.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
011	☒ R ☐ M Number 4.0	**After Path, insert the following: responsible for assessing and approving or denying the Interchange Transaction.**
012	☐ R ☐ M Number	**Referring to the Source Reference section, remove the reference to Compliance Template P3T3 as it is not referenced in the standard.**
012	☒ R ☐ M Number 4.0	**In the current standard, after the phrase …as tagged the text goes on to say the following: in accordance with Policy 3A requirement 2. This was left out presumably because of the desire to not refer to E-Tag. Note also that the correct reference is Policy 3A requirement 6, not Policy 3B.**
012	☒ R ☐ M Number 5.0	**After Interchange Schedules, add or schedule changes.**
013	☐ R ☐ M Number	**Under the Source References section, the reference should be to Compliance Template P3T4, not P3T3**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
013	☐ R ☐ M Number	**References to RA should be removed.**
013	☒ R ☐ M Number 1.0	**Per current policy (P3D, req. 2.5), regarding communication of modifications to the Interchange Transaction, entities beyond the Sink BA should be notified. Others to be included are the Source BA, the GOP, PSE, etc.**
014	☒ R ☐ M Number	**Suggest global replacement of references to RA with RC.**
014	☒ R ☐ M Number 3.0	**The proposed language represents a shift in required action from the current standard. The exising language calls for techncial information pertaining to protective relays to be available in the control room. The propsoed lanuguage suggests that this information be directly provided to each person qualifying as operating personnel. This may place a new burden on some entities.**
015	☒ R ☐ M Number	**Suggest global replacement of references to RA with RC.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
015	☒ R ☐ M Number 6.0	**This standard need to be restructured. Per the FM, the BA does not perform reliability assessments. This is the job of the RA (or the RC in the non-FM view?). It's also not clear from the FM that the TOP is performing reliability assessments. So if the purpose of the PSE providing information for the performance of reliability assessments, then such information should not be directed to the BA or TO, unless these entities are intended to only be conduits for the information.**
015	☐ R ☒ M Number 1.0	**The PSE should not be included within this measure. The intent of the measure being translated (from P4T2) is to apply the measure to Operating Authorities. PSEs are not Operating Authorities by definition. The RA should also not be included in this measure. The proposed measure is outside the context of Version 0.**
016	☒ R ☐ M Number 1.0	**This is a new requirement, and hence a Version 1 standard. No place in Policy 4 does it state that a GOP or TOP shall provide planned outage information.**
016	☒ R ☐ M Number 1.1	**This standard goes beyond the requirements contained in P4T4 which is being translated. The template is focused on Control Areas and their interaction with the Reliability Coordinator. This relationship has been taken down a level to a relationship between the GOP and TOP, thus creating new requirements in policy. No disagreement that such a relationship must exist, but the creation of new requirements is beyond the scope of Version 0.**
016	☐ R ☐ M Number	**Within the Levels of Non Compliance section, need to define responsible entity. Also, should replace RA with RC.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
018	☒ R ☐ M Number	**Global comment on standard 018: Need to settle on either RA or RC. To use both is confusing the question of who is the ultimate reliability authority.**
018	☒ R ☐ M Number 2	**Consistent with existing policy (P5A, req. 2.1) the GOP should be included within this standard as it qualifies as an Operating Authority.**
019	☒ R ☐ M Number	**Global comment on standard 019: Need to settle on either RA or RC. To use both is confusing the question of who is the ultimate reliability authority.**
020	☒ R ☐ M Number	**Global comment on standard 020: Need to settle on either RA or RC. To use both is confusing the question of who is the ultimate reliability authority.**
024	☒ R ☐ M Number	**Global comment on standard 024: Need to settle on either RA or RC. To use both is confusing the question of who is the ultimate reliability authority.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
024	☒ R ☐ M Number 14.0	**Concerned that the translation from Control Area to BA or TOP creates a new requirement for the GOP. The proposed language allows the possibility of the GOP having to perform tests at the request of both the BA and TOP. The GOP should only be required to perform 2 seasonal capability tests per year (winter and summer) within pre-defined parameters.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Robert C. Williams**	
Organization:	**Florida Municipal Power Agency**	
Telephone:	**407-355-7767**	
Email:	**bob.williams@fmpa.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☒ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☒	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*
Joseph J. Krupar	Florida Municipal Power Agency	FRCC	3

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

For a better transition from NERC Operating Policies to Standards in Version 0 it is recommened that Reliability Authority be dropped, Reliability Coordinator be included and the Control Area responsibilities be split between the Transmission Operator and the Balancing Authority. Then an evaluation of the operation of the functions in Version 0 Standards can be used in any future revision of the Functional Model.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
See comments on question 1.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Could live with either and alternative B, at best, is an interim solution. The ideal requirement would be that a tag be required for the next day estimated hourly energy of a Dynamic Interchange Schedule, but no updates would be necessary if the actual schedule signal is provided to the Reliability Coordinator overseeing the Area of the Bulk Electric System. The Reliability Coordinator overseeing the Area of the Bulk Electric System would be required to provide the actual schedule signal to the IDC. This is more information that the IDC receives from an existing Control Area about the generation dispatch that effects flowgates modeled in the IDC.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

The attachments need to be upgraded to be included in the Version 0 Standards. Glossary of Terms need to be used and other terms like Contol Area needs to be changed to BA or TOP. Also terms used in these Attachments may require additions to the Glossary like the terms RMS, CTs, PTs which are used in one Attachment.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

In fact, the Reliability Coordinators, Transmission Operators and Balancing Authorities should be the only ones that are responsible for compliance in the operations sections Version 0 Standards.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Bulk Electric System	☐ Delete ☐ Add ☐ Modify	**OK for now. But needs work to assure TOPs, BAs and RCs functions to assure reliability to the Bulk Electric System.**
Network Integration Transmission Service	☐ Delete ☐ Add ☒ Modify	**Change "tot hat" to "to that" in the definition.**
Network Integration Transmission Service	☐ Delete ☒ Add ☐ Modify	**Need to add "The highest quality service offered to customers under a filed rate schedule that anticipates no planned interruptions."**
Area	☐ Delete ☐ Add ☒ Modify	**Remove Reliability Authority in definition because the RA should not be included in Version 0.**
Reliability Authority	☒ Delete ☐ Add ☐ Modify	**Remove Reliability Authority because the RA should not be included in Version 0.**
Reliability Authority Area	☒ Delete ☐ Add ☐ Modify	**Remove Reliability Authority Area because the RA should not be included in Version 0.**
Reliability Authority Information System	☐ Delete ☐ Add ☒ Modify	**Change title to Reliability Coordinator Information System because the RC has been added to Verion 0 Standards. Also change acronym to RCIS.**
Reliability Coordinator	☐ Delete ☐ Add ☒ Modify	**Remove Reliability Authority in definition because the RA should not be included in Version 0.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments
See question 11 for comment on show stoppers.

Question 11:

Are there any "show stoppers" in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

We believe that the Reliability Authority should not be included in Version 0 Standards since the Reliability Coordinator has been added. There is only partial implementation of the Functional Model and the compliance obligations, for the operating portion of Version 0 Standards, are placed on the reliability functions. The only entities being monitored for compliance of the Operating Policies now are the Control Areas and Reliability Coordinators which should translate to Transmission Operators, Balancing Authorities and Reliability Coordinators in the operating portion of Version 0. The operating portion of Version 0 Standards can be worded properly so that the existing Control Area responsibilities are given to the Transmission Operator and Balancing Authority. The existing responsibilities for the Reliability Coordinators should be retained.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
1.0	☒ R ☒ M Number	**In R1, R2, M1 and CPS2 Data, the symbol epsilon in the text is slightly different than the symbol epsilon in the equations. Should be same symbol for epsilon in all of Draft 2.**
1.0	☒ R ☒ M Number	**In R1 the term "targeted frequency bound" was changed to "targeted frequency bandwidth". If bandwidth is the new term then bound should be changed in R2, M1, CPS1 Data and CPS2 Data.**
1.0	☐ R ☒ M Number 2	**Last sentence of M2 should be a Requirement (R5) instead of a Measurement. "A Balancing Authority providing or receiving Supplemtal Regulation Service through Dynamic Transfer shall continue to be evaluated on the characteristics of its own ACE with the supplemental Regulation Service included."**
1.0	☐ R ☐ M Number	**Regional Differences The actual ERCOT Control Performance Standard 2 Waiver approved November 21, 2002 by the OC should be shown under "Regional Differences".**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
2.0	☐ R ☒ M Number 1.0	**The term Reportable Disturbance needs to replace some words in the first sentence of M1. Recommended change " A Balancing Authority or Reserve sharing Group shall calculate and report compliance with the Disturbance Control Standard for all Reportable Disturbances.**
2.0	☐ R ☒ M Number 1.0	**In [PSRD 2.3] the second ACE in the first sentence should be eliminated. Also there are three ACE subscript "m" in [PSRD 2.3] that should be changed to subscript "M".**
4.0	☒ R ☐ M Number 3.0	**Change to "Each Balancing Authority, when requested, shall participate in a Time Error Correction by one of the following methods:** **R3.1 [Policy 1D 3.1] The Balancing Authority shall offset its frequency schedule by 0.02 Hertz, leaving the Frequency Bias Setting normal; or** **R3.2 [Policy 1D 3.2] The Balancing Authority shall offset its Net Interchange Schedule (MW) by an amount equal……."**
6.0	☒ R ☐ M Number	**Regional Differences The actual MISO RTO Inadvertent Interchange Accounting Waiver approved by the Operating Committee on March 25, 2002 should be shown under "Regional Differences".**
7.0	☒ R ☐ M Number	**The "Reliaibility Authorities" and "Reliability Authority" should be changed to "Reliability Coordinators" and "Reliabilty Coordinator" in "Applicability" and R1-6**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
7.0	☒ R ☐ M Number 2.0	**Need to include "Balancing Authority" because of the impact on stability of generation serving load.**
008	☒ R ☐ M Number	**Remove "Reliability Athority" from Standard 008.**
009	☒ R ☐ M Number	**The sentence "Violations are also reported to the compliance program." is unnecessary in the Purpose.**
9.0	☒ R ☐ M Number	**Remove "Reliability Authority" from Standard 009.**
9.0	☒ R ☐ M Number 5.1	**Remove "by the Transmission Operator"**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
9.0	☒ R ☐ M Number 9.0	**Recommend that "Reliability Authority shall direct" be replaced with "Reliability Coordinator and Transmission Operator shall direct or implement".**
10.0	☒ R ☐ M Number	**The "Reliability Authority" should be removed from the Purpose.**
10.0	☐ R ☐ M Number	**Regional Differences The actual WECC Tagging Dynamic Schedules and Indaverent Payback Waver approved by the OC and effective on November 21, 2002 should be shown under "Regional Differences".**
10.0	☒ R ☐ M Number	**Regional Differences The actual MISO Energy Flow Information Waiver approved by the OC and effective July 16, 2003 should be shown under "Regional Differences".**
11.0	☒ R ☐ M Number 1.0	**Remove "Reliability Authority(ies),"**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
13.0	☒ R ☐ M Number	**Remove "Reliability Authorities" from Applicability and "Reliability Authority" from R1, R4 and R5.3**
13.0	☒ R ☐ M Number	**Regional Differences The actual WECC Tagging Dynamic Schedules and Indaverent Payback Waver approved by the OC and effective on November 21, 2002 should be shown under "Regional Differences".**
14.0	☒ R ☐ M Number	**The "Reliability Authorities" & "Reliability Authority" needs to be removed from Standard 014.** **Requirement R1.1 should be rewritten to require the BA to receive information from the Generator Operator.** **The second R1.2 should be removed if RA is removed from Standard 014.**
15.0	☒ R ☐ M Number	**In the Applicability section the "Reliability Authority" should be removed.** **In R1 and R1.1 all "Reliability Authority" should be changed to "Reliability Coordinator".** **In R2 and R5 remove "Reliability Authority" and "Reliability Authorities".** **In M1 remove "Reliability Authority".**
15.0	☒ R ☐ M Number	**In non-complaince level 1 and level 4 "responsible entity" should be changed to "Transmission Operator and Balancing Authority" and "requesting entity" should be changed to "Reliability Coordinator".** **In Attachment 015-1 "Reliability Authorities" should be changed to "Reliability Coordinators".**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
16.0	☒ R ☐ M Number	**In Purpose and Applicability "Reliability Authorities" should be replaced with "Reliability Coordinators".** **In R1.1 the Transmission Operator should obtain the outage data from the Generator Operator and provide the outage data to the Reilability Coordinator.** **In R1.2, R2, R3, R4, M1, Compliance Monitoring and Levels of Non Compliance the "Reliability Authority" should be replaced with the "Reliability Coordinator".**
17.0	☒ R ☐ M Number	**In R1 and R2.2 the "Reliability Authority" should be removed.** **In Applicability, R3.2, R4, R5.2 and R6 the "Reliability Authority" should be changed to "Reliability Coordinator".**
18.0	☒ R ☐ M Number	**In Purpose change "normal conditions during and emergency" to "to normal coditions during and after an emergency".** **In Applicability, R1 and R2 the "Reliability Authority" should be replaced with "Reliability Coordinator".** **In R3, R4 and R5 the "Reliability Authority" should be removed.** **In R6 and R7 "Reliability Authority" should be replaced with "Reliability Coordinator".** **The second R7 should be R8.**
19>28	☒ R ☐ M Number	**The "Reliability Authorities" and "Reliability Authority" should be removed from Standard 019, 020, 021, 022, 023, 024, 025, 026, 027 and 028.** **In Attachment 020-1 A 1 the "Reliability Authority's" should be changed to "Reliability Coordinator's".** **In Attachments 022-1 and 022-2 The "Reliability Authorities" and "Reliability Authority" should be removed. Also in Attachment 027-4 "reliability coordinators" replace "Reliability Coordinators".**
29>30	☒ R ☐ M Number	**The "Reliability Authorities" and "Reliability Authority" should be replaced with "Reliability Coordinators" and "Reliability Coordinator" in Standard 029 and 030.** **In 030 M1 add " have the " between the words "personnel" and "responsibility". Also in 030 M1 d) change "are" to "can be" or "shall be".**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
31.0	☒ R ☐ M Number	**The "Reliability Authority" should be replaced with "Reliability Coordinator".** **In Self-Certification of Compliance Monitoring Process change "requirement 1 and 2" to "R1" because there is only one requirement of Standard 31.** **In Level 2 of Levels of Non Compliance change "Requirement 1" to "R1.1". Also in Level 3 change "Criterion 2 of Requirement 1" to "R1.2".**
31.0	☒ R ☐ M Number	**Attachment 031-1 has:** **The word control area 41 times. Should be changed to Balancing Authority and/or Transmission Operator as appropriate.** **Terms used in the Glossary of Terms like dynamic schedules that are not shown as defined terms like Dyanmic Schedules. Need to go though the attachment to correct.** **There are incorrect terms like "Regional Council" which in the glossary is Regional Reliability Organization (Region).**
32.0	☒ R ☐ M Number	**The "Reliaibility Authorities" and "Reliability Authority" should be changed to "Reliability Coordinators" and "Reliabilty Coordinator" in Standard 032.** **Remove the words "either one or" from R1 to be consistent with existing Policy.** **In the Compliance Monitoring Process the term "Operating Authority" should be changed to "Reliability Coordinator, Transmission Operator or Balancing Authority".**
33.0	☒ R ☐ M Number	**The Reliability Authority should be removed from Standard 033.** **In Compliance Monitoring Process the words "operating entities" are used twice and should be replaced with "Transmission Operator and Balancing Authority".**
34.0	☒ R ☐ M Number 234.0	**Remove "Reliability Authorities".**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
36.0	☒ R ☐ M Number 3.0	**Remove "Reliability Authorities".**
37.0	☒ R ☐ M Number	**In R4, R7 and R8 Remove "Reliability Authorities".** **In R7 change "(RAIS)" to "(RCIS)".**
38.0	☒ R ☐ M Number	**The "Reliability Authorities" and "Reliability Authority" should be removed from Standard 038.**
039	☒ R ☐ M Number	**The "Reliability Authorities" should be removed from Standard 039.** **Attachment 039-1:** **In 1.3 and 2.8.2 change "bulk system" to "Bulk Electric System".** **In Figure 1 of 6.2 the current hour and next hour are missing.** **In Figure 2 of 6.2 "Sink Control Area" should be changed to "Sink Balancing Authority".** **In 7.9 "Control Area" should be changed to "Balancing Authority".**
40.0	☒ R ☐ M Number	**The "Reliability Authority" in R1, R3 and R4 should be changed to "Transmission Operator and Balancing Authority". The "Reliability Authority" should be removed from R5.**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

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A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**California ISO**	
Organization:	**Ed Riley**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☒ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☒	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

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This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

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SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments
The Functional Model needs to be immediately updated to include the Reliability Coordinator. This needs to include defining which functions and tasks belong to the RA and which belong to the RC.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

If a standard is dependent on the information that is included in a guide to be complete and implementable, then the guide needs to be included in the standard and subject to the same ANSI process for approval and revision as the standard.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

As stated in the question, Phase III and Phase IV standards should be reviewed by the Planning Standards Task Force as soon as possible and any standards needed to support the NERC blackout recommendations should be entered into the standards development process as Urgent Action SARs separate from Version 0.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

Methodologies for developing and review of ATC values should be developed as NAESB Business Practices.

Methodologies for developing and review of TTC must remain as a NERC Reliability Standard.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
The use of TRM is a reliability tool so the methodology to calculate TRM should remain a Reliability Standard.

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Various	☐ Delete ☐ Add ☒ Modify	**Several terms in the Glossary do not have definitions. The Glossary needs to be completed and reposted.**
Regional Reliability Organization	☐ Delete ☐ Add ☒ Modify	**It is important that this definition be developed. Many of the requirements are the responsility of the RRO and it is not part of the Functional Model.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

The proposed numbering scheme will not work as some standards will not be able to be assigned to only one area.

The CAISO believes an updated numbering scheme is needed but should be done after Version 0 is complete.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments
Please refer to the show stoppers listed in Question 11.

The CAISO fully supports the Version 0 concept and hopes that the several show stoppers can be resolved so the CAISO can vote in favor of Version 0.

The CAISO is also very concerned about the resolution of the RA v. RC issue.

Question 11:

Are there any "show stoppers" in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
The CAISO has identified two show stoppers:

1) NERC Tagging:

Standard 10 - Interchange Transaction Tagging
Measure 1 sets a 100 Percent criteria for tagging. It is not feasible for an entity that implements over a thousand tags per day to have 100 Percent compliance. If you were to have an error on one tag per day you would continually be in a level 4 non-compliance. This is unacceptable to the California ISO and we will be forced to vote against Version 0 if this is included. (Note: This Standard does not include levels of non-compliance but the CAISO is assuming the NERC compliance group would develop them simular to those of Standard 13). When tagging was added to the WECC Reliability Management System (RMS) it had to be implemented using a percentage of missed tags as a basis, instead of a fixed number of missed tags to obtain approval for implementation. (Note: This Standard lists a Regional Difference for WECC. This Regional Difference only applies to Dynamic Schedules).

Standard 13 - Interchange Transaction Modifications
Concern is the same as Standard 10. (Note: Entities in WECC are currently exempt from Requirement 5, tagging of Dynamic Schedules, as a Regional Difference).

2) Standard 67.3 - Implementation and Documentation of Underfrequency Load Shedding Equipment Maintenance Program

Maintenance requirements are imposed on Transmission Operators (TOPs) incorrectly. Unless a TOP also owns the equipment and facilities, it does not have access, nor jurisdiction over the maintenance. In the case of the CAISO, this requirement goes directly against the Transmission Control Agreement (TCA) we have with the TO's. Therefore, this responsibility should lie with the Transmission Owner (TO). It is unclear if this requirement was carried over from the source materials, or if it was mistakenly assigned during the drafting process, but if left, this will be a show stopper for the CAISO. If removed, Transmission Operator should be deleted from R3-1, R3-2, M3-1, and M3-2.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
11.0	☒ R ☐ M Number 1	**Add: f) Generating source**
17.0	☒ R ☐ M Number 3.0	**R3.1 The Generator Operator should be Generator Owner and Transmission Operator should be Transmission Owner.** **R3.2 The Transmission Owner should coordinate with it's RA and TOP and affected TO's and BA's.**
20.0	☐ R ☐ M Number	**Attachment 020-1 - Energy Emergency Alerts** **BA and Resource Sharing Groups need to be added in the Introduction first sentenece after Load Serving Entity.** **RA needs to be added to A.2. as a party to be notified.** **RA needs to be added to B.2.2 as a party to be notified.** **RA needs to be added to B.3.5.1 as a party to be notified.** **RA needs to be added to B.4.1 as a party to be notified.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
20.0	☐ R ☐ M Number	**Attachment 020-1 - Energy Emergency Alerts** **The following locations, B.3.6 and 4C, refer to NERC Policy 9B. This is actually now in NERC Policy 5.** **These references to NERC Policies will be invalid after Version 0 is in place.**
31.0	☐ R ☐ M Number 4	**In the Title section, P8T3 should be added as a source of requirements for the Standard.** **Reliability Coordinator should be added to the Applicability section.**
32.0	☒ R ☒ M Number	**Reliability Coordinator should be added to the Applicability section.** **Reliability Coordinator should be added to R1 as a responsible party.** **Reliability Coordinator should be added to M1 as a responsible party.**
38.0	☒ R ☐ M Number 4	**Reliability Authority should be added to the Applicability section.** **Load Serving Entities should be added to Requirement 4 at the very end after Balancing Authority.**
67.3	☒ R ☐ M Number	**Remove Transmission Operator from R3-1, R3-2, M3-1, and M3-2. The Transmission Operator is not responsible for equipment maintenance programs. This item could be a show stopper for the California ISO and has been identified as such in Question 11.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
53.0	☐ R ☐ M Number	**In the Purpose Statement between Generator Owners and Transmission Owners replace the word and with a comma.**
53.1	☐ R ☒ M Number 1.2	**Remove the word it after that they.**
	☐ R ☐ M Number	
53.2	☒ R ☐ M Number 2.1	**In c, replace the word cooperated with coordinated.**
58.1	☒ R ☐ M Number -12.0	**Remove NERC from the list of parties the data shall be provided to.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.2	☒ R ☐ M Number 2.1	**In b, replace (net real and reactive power) with (gross real and reactive power).**
58.2	☒ R ☐ M Number 2.1	**In d, add line status, transformer ratings, and metering locations.**
	☐ R ☐ M Number	
60.0	☒ R ☐ M Number 1.2	**Add Reliability Authority to list of parties to receive documentation in addition to the RRO and NERC.**
69.0	☐ R ☐ M Number	**The way this is currently written it could apply to any SPS. It should be rewritten to indicate that it only applies to SPS's that protect the Interconnection as a whole and not SPSs that are installed for local reliability problems.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
69.6	☒ R ☐ M Number 6.1	**In f, it needs to be changed to require that the last two dates of testing and maintenance are kept. This is necessary to verify an action that is required bi-annually or bi-monthly.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

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DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☒ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
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	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
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Group Comments (Complete this page if comments are from a group.)

Group Name: **Duke Power Company**

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Sam Holeman	Duke Power Company	SERC	1
Greg Stone	Duke Power Company	SERC	1
Kodwo Ghartey-Tagoe	Duke Power Company	SERC	1

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☐ Agree.

☒ Disagree.

Comments
NOTE: These comments are still in DRAFT form.

Note: Since the use of quotations is forbidden, an asterisk (*) is used to denote quotation marks.

This violates the charge given the Drafting Team. The language in Draft 1 is acceptable. Reversion to that language is the acceptable solution.

The fact that current Reliability Coordinator duties do not align with the functional model responsibilities of a Reliability Authority is clear evidence that additional development of the Functional Model is needed. This development should be performed in a fair and open (ANSI) approval process and should not be done through the decision of a single drafting team.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

This is the choice of the lesser of two undesireable alternatives. Deferral of implementation of Reliability Authority is preferred principally because it is quite evident that additional development of this element of the Functional Model is needed. It is recognized that assignment to the Transmission Operator is a temporary solution, but at least it does not violate the charge given the Drafting Team.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Although Alternative B is very much desired as an improvement to current policy, it is a change to policy nonetheless and violates the charge given the Drafting Team. This particular change is a very good example of the kind of standard for which an appropriate SAR could move through the approved ANSI process to implementation in record time.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

Again, although many of the guides are very well written and quite correct, this is outside the scope of the SAR. These guides should be handled through an appropriate approval process. As guides only, this approval may be gained through approval by the appropriate committee, but consideration as requirements must be through the ANSI approved process.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Not only is it agreed that these standards be dropped, but it should be noted that some of these standards have been in some phase of development for more than five years and it not likely that an Urgent Action SAR will resolve the problems with these standards overnight.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

The following is a comment submitted in response to a draft of the *Determine Facility Ratings, Operating Limits and Transfer Capabilities* SAR:

First Contingency Incremental Transfer Capability (FCITC) is the basic calculation normally used to determine transfer capability. FCITC calculations can be impacted by the assumed source and sink designations, contingencies examined, required participation factors, allowance for operating guides, as well as other assumptions employed in the base model. Affecting the result of FCITC calculations will have an obvious impact on the ultimate calculation of ATC values used by the market. Because transfer capability calculation has market implications, the procedures used should be addressed jointly by NAESB and NERC.

TTC, ATC, TRM, and CBM are all based on FCITC. The point of the comment is that we should recognize that all of these calculations have both reliability and business practice impacts. Standards 054, 055, and 056 should all be included in Version 0, but they should also be considered by NAESB to determine business practice impacts and, through the JIC, a consensus should be reached.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All of these calculations (TTC, ATC, TRM, and CBM) have both reliability and business practice impacts. Standards 054, 055, and 056 should all be included in Version 0, but they should also be considered by NAESB to determine business practice impacts and, through the JIC, a consensus should be reached.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All of these calculations (TTC, ATC, TRM, and CBM) have both reliability and business practice impacts. Standards 054, 055, and 056 should all be included in Version 0, but they should also be considered by NAESB to determine business practice impacts and, through the JIC, a consensus should be reached.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	**General comment on the Glossary: There are many terms, old and new, which warrant inclusion. The Glossary should be more thorough or omitted.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

There is enough confusion already. Mapping of existing policy to new standards has already been published and used to review drafts thus far. Changing the scheme on the third and final draft would add confusion to the review process for balloting.

If, as further development of the Functional Model occurs, it is likely that the proposed new scheme would result in a standard changing its identifier simply because the Functional Model changed the responsibilities of a given entity. The resulting confusion is not needed.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

Reversion to Draft 1, with corrections for grammar, typos, etc., elimination of incomplete Planning Standards, and exclusion of any standard that is not within the scope of the SAR (i.e., not already approved as policy, standard, or template) would be acceptable.

Question 11:

Are there any "show stoppers" in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
Yes.
1)Introduction of new Functional Model elements (i.e., both a Reliability Coordinator and a Reliability Authority),

2) Inclusion of incomplete Phase III or IV planning standards, and

3) Any modifications or additions to existing policy (This is not the charge of the Drafting Team).

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

The Drafting Team is to be commended on its efforts, particularly in the work to develop Draft 1, and those efforts are greatly appreciated.

Duke did not make any substantial comments to Draft 1 precisely because it was solely a direct mapping of existing policies, standards, and templates to the new standard structure. It is recommended that Draft 1 (with the improvements noted in the comments to questions 10 and 11) be used with appropriate mapping of CA/RC functions to the appropriate EXISTING Functional Model entities that currently exist in the industry.

According to the *Plan for Accelerating the Adoption of NERC Reliability Standards*, the SAR itself, and in other explanatory documents, Version 0 was not intended to implement policy changes. Some of the changes in Draft 2 are in fact a change from the original policies, templates, and standards. A clear example of this is the difference between Drafts 1 and 2 of Standard 007.

It is understood that the definitions of Transmission Operator, Balancing Authority, Reliability Authority, and any other Functional Model entities referenced in the new standards will retain the definition provided in the standards. Revisions to the definition of these entities in any future versions of the Functional Model will not change the definitions incorporated in the standards without explicit revision of the standard.

The mapping of Functional Model entities to existing structures in the industry is not complete and needs further development. The requirements in the letter *Request to Register Entities for Implementing Version 0 Standards*, being principally a directive as to how entities must register, are premature. The requirement and qualifications for registration need to be clearly defined and approved through the appropriate approval process. Assuming these standards are approved through the balloting process, it is unclear how the industry moves beyond the standards to implementation of them through the various entities, compliance monitoring of the various entities, and enforcement of the standards. We all risk failure to meet compliance by registering to perform functions that have not been clearly defined.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Alan Boesch**	
Organization:	**Nebraska Public Power District**	
Telephone:	**402-845-5210**	
Email:	**agboesc@nppd.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☒ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

I agree with inserting the Reliability Coordinator. However, including the Reliability Authority in the standards will only cause confusion unless there is a document tha describes the responsibilities of the Reliability Authority. Modifying the model to assign local reliability functions to the Reliability Authority and the big picture to the Reliability Coordinator would be the best model and would adapt to all existing configurations. If the Functional Model team refuses to modify the model then I would suggest that the drating team create a document that provides the discription of the responsibilites and relationships of all the entities in the Version 0 standard.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

I do not agree with either option. DO NOT ASSIGN RESPONSIBILITY TO TWO FUNCTIONS. The word "or" should be banned from the standards. The Functional model needs to be revised to correctly assign the local reliability to the appropriate entity. I have no preference for Transmission Operator or Reliability Authority. After the model is changed or the drafting team develops there own document to identify responsibilities the appropriate entiy can be identified in the standard.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

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R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

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Question 4: Guides

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Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

"Shall be considered" means to think about them. These are good items and should be captured in a reference document for the industry to use when developing restoration plans and training programs.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

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- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
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- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

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- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

54.3 Having a common methodology is a good idea. Take out all the language about equity and markets and stick to the reliability benefits of the standard.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
55.3, 55.4 Having a common methodology is a good idea and the reliability benefits of the CBM should be included in the standard. Take out all the language about equity and markets and stick to the reliability benefits of the standard.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
Having a common methodology is a good idea and the reliability benefits of the TRM should be included in the standard. Take out all the language about equity and markets and stick to the reliability benefits of the standard.

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

The version 0 standards fail to add clarity to the existing polices and standards. Allthough they are in a format consistent with reliability standards they do not meet the Definition of a Reliability Stanard as defined in the NERC Reliability Standards Process Manual approved by the NERC Board. As defined "A Reliability Standard defines certain obligations or requirements of entities that use the bulk electric systems of North America. The obligations or requirements must be material to reliability and measureable." Much of the information in the version 0 standards would be better suited for a Standard Reference, Procedure, or Practice as described in the NERC Reliability Standards Process Manual. Below are some specific comments.

All requirements should have measurements. If they do not have measurements then they should be retained in a supporting document.
Some of the requirements, such as participation in time error correction, are not reliability related and do not reflect the purpose of the standard.
Standard 006 has a good purpose but does not have any requirements to support the purpose. It does not include measurements.
Several requirements are assigned to the Transmission Operator and the Reliability Authority some are assigned to the Transmission Operator or the Reliability Authority. Other requirements are assigned to the BA, RA and TOP. One entity needs to have the responsilbility to meet the requirements.
As defined the RA and the RC both are the "highest level". Please define the relationship between the RA and the RC.
The relationship between the Reliability Authority, Transmission Operator and Reliability Coordinator is not clearly defined.
The standards have numerous instences of improper assignment of tasks. For example the BA balances load, generation and interchange schedules and supports frequency. Contray to the definition of a BA the version 0 standards require the BA to be familiar with system protection schemes. This is one of many misaplications that were identified in comments to the first draft of the standards. The standard drafting team did not implement the comments and the responsibilities of the BA and TOP are inconsistent with the functional model. It is not sufficient for the drafting team to implement the functional model in name only. The appropriate requirements and tasks need to be assigned to the appropriate functions.

Please slow down and do it right.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

All requirements should have measurements. If they do not have measurements then they should be retained in a supporting document.
Some of the requirements, such as participation in time error correction, are not reliability related and do not reflect the purpose of the standard.
Standard 006 has a good purpose but does not have any requirements to support the purpose. It does not include measurements.
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Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
25.0	☒ R ☐ M Number 4.3	**As I stated in the comments on the first draft "Develop, maintain, and implement a set of plans to mitigate operating emergencies for load shedding." does not make any sense and should be changed to read "Develop, maintain a set of plans to implement load shedding for operating emergencies"**
25.0	☒ R ☐ M Number 4.4	**As I stated in the comments on the first draft "Develop, maintain, and implement a set of plans to mitigate operating emergencies for system restoration." does bnot make any sense and should be changed to read "Develop, maintain a set of plans to implement System Restoration"**
24.0	☒ R ☐ M Number 4.0	**Take the TSP out of this standard and put in the transmission owner as it is currently identified in Policy 6. The generator owner will coordinate with the BA and the Transmission owner will coordinate with the TOP.**
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Anita Lee, P.Eng.**	
Organization:	**Alberta Electric System Operator**	
Telephone:	**403 539-2497**	
Email:	**anita.lee@aeso.ca**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☒ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☒	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

The RC/RA issues are very contentious and we encourage NERC to urgently address the ambiguities between the current roles of the RC and the future responsibilities of the RA.

As an interim measure, we support the retention of the existing RC responsiblities and the existing operating agreements between the RC and those they are coordinating.

We believe there should be one "ultimate authority" for wide-area oversight. That being said there are alternatives to assigning all of the responsibilities of the RA to the RC to achieve this.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

See comments to Question 1. We agree to defer implementation of RA until the RA/RC roles and responsibilities are clarified.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

These guides should be reviewed and considered for inclusion in the Version 1 standards if appropriate.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

ATC methodology should be NAESB business practice.

TTC methodolgy should remain as NERC reliability standards.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
TRM should remain as NERC reliability standards.

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Various	☐ Delete ☐ Add ☒ Modify	**Several terms in the Glossary do not have definitions. The Glossary must be completed and reposted.**
Regional Reliability Organization	☐ Delete ☒ Add ☐ Modify	**This definition should be added.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
How many "general areas" or categories will be there?
There may be standards that involve multiple functions and will not fall into one particular category.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

There must be a indication of commitment from NERC that the issue with respect to RA and RC will be resolve as a priority and be included in the Version 1 standards.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

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Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

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Draft 2 of Proposed Version 0 Reliability Standards

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Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**William L. Wylie**	
Organization:	**OGE Energy Corp**	
Telephone:	**405-553-3461**	
Email:	**wyliewl@oge.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☒ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
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	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

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☒ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Version 1 is a likely candidate for this hand-off, but not necessary or desirable for Version 0.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Version 1 is a likely candidate for this hand-off, but not necessary or desirable for Version 0.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Version 1 is a likely candidate for this hand-off, but not necessary or desirable for Version 0.

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Bill Dearing**	
Organization:	**P.U.D. #2 of Grant County**	
Telephone:	**509-754-5088 Ex. 2105**	
Email:	**bdearin@gcpud.org**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☐	1 - Transmission Owners
☐ ECAR	☐	2 - RTOs, ISOs, Regional Reliability Councils
☐ FRCC	☒	3 - Load-serving Entities
☐ MAAC	☒	4 - Transmission-dependent Utilities
☐ MAIN	☒	5 - Electric Generators
☐ MAPP	☐	6 - Electricity Brokers, Aggregators, and Marketers
☐ NPCC	☐	7 - Large Electricity End Users
☐ SERC	☐	8 - Small Electricity End Users
☐ SPP	☐	9 - Federal, State, Provincial Regulatory or other Government Entities
☒ WECC		
☐ NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

Those specific duties assigned to the Reliability Coordinators by Policy 9 should remain assigned to that entity. All other references made to Operating Authorities should be broken out to RA/TOp/BA functions. This would most consistently follow what Ver0SDT was asked to do in rewriting current Policies to the new Standards format. It is important that the Reliability Coordinator entity is not assigned any more authorities than is currently assigned to him. Conversely, he should not have less authority when the Ver0 Standards are implemented.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

By completely removing the Reliability Authority, and dividing this function between the Reliability Coordinator and the Transmission Operator, Version 0 has failed to implement the Functional Model in conjunction with the current Policies. This could create a situation that may allow the Reliability Authority to be implemented at a later time, and inconsistent to current Pacific Northwest practices and charters. Grant would be strongly opposed to any proposal that does not reflect current practices, accurately translate current policies, and incorporate all of the Functional Model concepts given to Ver0. This will be a primary consideration when voting to accept the Ver0 finished product.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

The Ver0SDT was tasked specifically with translating current policies, not with correcting the deficiencies. Any deficiencies should be noted by the team, and addressed in future versions. Because of the aggressive timeline for Ver0 product, the Ver0SDT should refrain from engaging in any discussions on how to fix deficiencies in the standards. To take on the task of correcting this deficiency, the Ver0SDT puts itself in a position to begin fixing others. This will cause unending debate.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

It has become apparent, through the recent Readiness Audits, that having a guide is not very beneficial when evaluations are based on Industry Best Practices. We do not think that having the guides included as "shall be considered" will harm the effort. However, we encourage the Ver0SDT to fall back to its original directives, and let the industry decide what is best practice. Removing these attachments will streamline the document.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

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- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

It is important that current practices are captured, not new and unproven practices implemented. The Ver0SDT has enough controversy without introducing new and unproven standards.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Though these standards have an impact on Market interests, they must first be determined for reliability reasons. Therefore Ver0SDT should retain these measures

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Though these standards have an impact on Market interests, they must first be determined for reliability reasons. Therefore Ver0SDT should retain these measures.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
Though these standards have an impact on Market interests, they must first be determined for reliability reasons. Therefore Ver0SDT should retain these measures.

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

Little advantage would be gained by including them in this Standard. The Distribution Provider would be held to more local standards in the Distribution System. Facilities that connect the Distribution Owners to the Transmission or Generator Owners would come under TO or GO responsibilities.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Balancing Area	☐ Delete ☐ Add ☒ Modify	**Balancing Authority Area. "Balancing Area" is not used in the documentation that I could find. "Balancing Authority Area" is**
Blackstart	☐ Delete ☒ Add ☐ Modify	**It is a term used in the documentation that should be well defined**
Burden	☐ Delete ☐ Add ☒ Modify	**"Operation of the Bulk Electric System in a way such that it causes, or may cause, another entity to violate SOL or IROL limits, or any other …"**
Cascading	☐ Delete ☐ Add ☒ Modify	**Replace "incident" with "contingency"**
Congestion Management Report	☐ Delete ☐ Add ☒ Modify	**Second sentence should read "This report identifies the transactions, and native and network…"**
Contigency Reserve	☐ Delete ☐ Add ☒ Modify	**Need to tie this to Operating Reserve. "That portion of Operating Reserves deployed…"**
Spinning Reserve	☐ Delete ☒ Add ☐ Modify	**Need to define since the term is used under Operating Reserve**
Supplemental Reserve	☐ Delete ☒ Add ☐ Modify	**Need to define since the term is used under Operating Reserve**
Demand Side Management	☐ Delete ☒ Add ☐ Modify	**Need to include the "DSM" abbreviation (020-7)**
Disturbance Control Standard	☐ Delete ☐ Add ☒ Modify	**Need to include the "DCS" abbreviation**

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

To efficiently manage the Standards, and the changes there after, a new numbering scheme must be applied as soon as practicable.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☒ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

As presented, we would approve the standards. There are issues in this posting that concern us, and we are confident that through this comment process that most of our concerns will be addressed.

Question 11:

Are there any "show stoppers" in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Our only show stopping issue is the RA/RC situation. If the Standards are changed to imply that the RC will be the only entity that can register as an RA we will actively challenge the approval of Ver0. We are very passionate in the belief that our rights, and current practices are preserved.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

We are concerned that the Ver0SDT is being influenced by outside interests. We believe there has been some inappropriate communications to the Ver0SDT from entities not interested in preserving procedures and practices permitted under the current interpretation of NERC Policies.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
1.0	☒ R ☐ M Number 2.0	**Typo. Replace "bound" with "band."**
1.0	☐ R ☒ M Number 2.0	**"L10 is defined in Standard 002." This is not defined as stated, it is defined in R2 (page 001-2)**
2.0	☒ R ☐ M Number 4.0	**Delete last sentence in first paragraph. Insert "100% of the time for Reportable Disturbances" between "met" and "within."**
2.0	☐ R ☒ M Number 1.0	**Formula appears to have an error. "0,"**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
2.0	☐ R ☒ M Number 1.0	**ACEM is defined twice using a different definition.**
2.0	☐ R ☐ M Number	**Compliance Monitoring Process: Second Paragraph is the same Standard as in page 001-5, paragraph 1, as it references NERC Control Performance Standards Survey. We understand that the reporting event is different, but the wording makes the report appear to be two different reports.**
2.0	☐ R ☐ M Number	**Levels of Non Compliance: We could not identify where "APR" is defined. Should this be "DCS?"**
3.0	☒ R ☐ M Number 1.0	**In reference to "NERC Operating Committee" throughout the Ver0 Standards, would it be more correct to use "Compliance Monitor?"**
3.0	☒ R ☐ M Number 6.0	**Change to active voice: (suggested) "A Balancing Authority shall not change its Frequency Bias setting when performing Supplemental Regulation Service."**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
4.0	☒ R ☐ M Number 4.1	**Add Reliability Authorities**
5.0	☒ R ☐ M Number 6.0	**Add Reliability Authority or replace Reliability Coordinator with Reliability Authority**
6.0	☐ R ☐ M Number	**Compliance Monitoring Process: Strike last sentence in third paragraph. It seems to be covered in the 5th paragraph.**
13.0	☒ R ☐ M Number 5.0	**Use current policy and resist fixing problems. Leave the issue to Ver1SDT.**
20.0	☐ R ☐ M Number	**Title: The letter "O" is used instead of the number "0."**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
20.0	☐ R ☐ M Number	**Attachment: A.1 Change this title to "Initiation" so the title isn't used in the first sentence.**
20.0	☐ R ☐ M Number	**Attachment: A.2 Use "Area of Responsibility" when referring to the Reliability Coordinator's Area. Use of Reliability Area could cause misunderstandings. This should apply throughout the Ver0 Standards Document.**
20.0	☐ R ☐ M Number	**Attachment: B.2.2 Add Reliability Authorities.**
20.0	☐ R ☐ M Number	**Attachment: B.2.4.4 Add Reliability Authorities. Strike Reliability Areas.**
20.0	☐ R ☐ M Number	**Attachment: B.2.6.3 DSM is not defined.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
20.0	☐ R ☐ M Number	**Attachment: B.3.5.1 and B.4.1 Add Reliability Authorities.**
20.0	☐ R ☐ M Number	**Attachment: B.3.6 and Section C have references to old Policies.**
27.0	☐ R ☐ M Number	**Attachment: Paragraphs 8 and 9 need Reliability Coordinators and Operating Entities capitalized.**
30.0	☐ R ☐ M Number	**Purpose: (recommended change) Establish the responsibility, and authority to implement real-time actions to ensure stable and reliable operation of the Bulk Electric System. This prevents R1 from repeating the purpose.**
30.0	☐ R ☒ M Number 1.0	**Missing the word "which" in b and d. Insert it before "states."**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
30.0	☐ R ☐ M Number	**Levels of Non Compliance: Level 4 "The Operating Authority has no written documentation, or has written documentation that includes none of…"**
31.0	☐ R ☐ M Number	**Through out this standard, where functions are listed, add Reliability Coordinator. The are held accountable to these training standards as well.**
31.0	☐ R ☐ M Number	**Attachment: We do not believe that this attachment is necessary. With that said, through out the whole attachment there are many references to NERC Policies, and to Control Areas. The problem with this attachment is that, even though these are suggested topics, the attachment is in such detail that it could be interpreted that training must follow this format. If it is decided to keep this attachment, considerable editing must be completed to have this conform to Functional Model language.**
32.0	☐ R ☐ M Number	**Applicability: Add Reliability Coordinator**
32.0	☒ R ☐ M Number 1.0	**Add Reliability Coordinator**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
32.0	☐ R ☒ M Number 1.0	**Add Reliability Coordinator**
32.0	☐ R ☐ M Number	**Levels of Non Compliance: Add Reliability Coordinator**
36.0	☒ R ☐ M Number 1.0	**Remove second sentence and incorporate this language into Standard 31 R1.2**
37.0	☐ R ☐ M Number	**Applicability: Add Reliability Authority**
37.0	☒ R ☐ M Number 3.0	**Add Reliability Authorities**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
37.0	☒ R ☐ M Number 5.0	**Add Reliability Authorities**
37.0	☒ R ☐ M Number 7.0	**Change Reliability Coordinator Information System (RAIS) to Reliability Authority Information System**
38.0	☐ R ☐ M Number	**Applicability: Add Reliability Authorities**
38.0	☒ R ☐ M Number 4.0	**Change Balancing Authority to Reliability Authorities**
39.0	☒ R ☐ M Number 15.0	**Change Reliability Coordinator Information System to Reliability Authority Information System**

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Draft 2 of Proposed Version 0 Reliability Standards

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Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Bill Dearing**	
Organization:	**P.U.D. #2 of Grant County**	
Telephone:	**509-754-5088 Ex. 2105**	
Email:	**bdearin@gcpud.org**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☐	1 - Transmission Owners
☐ ECAR	☐	2 - RTOs, ISOs, Regional Reliability Councils
☐ FRCC	☒	3 - Load-serving Entities
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☐ MAPP	☐	6 - Electricity Brokers, Aggregators, and Marketers
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☐ SERC	☐	8 - Small Electricity End Users
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☒ WECC		
☐ NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

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Additional Member Name	Additional Member Organization	Region*	Segment*

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This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Dynamic	☐ Delete ☐ Add ☒ Modify	**Dynamic Transfer**
Eastern Interconnection	☐ Delete ☐ Add ☒ Modify	**Use the term "Interconnection" and then define Eastern, Western, and Ercot**
Entities Responsible for the …	☐ Delete ☐ Add ☒ Modify	**Use "Entity(ies)"**
Energy Emergency	☐ Delete ☐ Add ☒ Modify	**Add Balancing Authority to the definition**
Load Shift Factor	☐ Delete ☐ Add ☒ Modify	**Definition is awkward**
Network Integration Transmission Service	☐ Delete ☐ Add ☒ Modify	**Typo in definition**
NERC Operating Committee	☐ Delete ☐ Add ☒ Modify	**Add NERC to the acronym. There are too many Operating Committees in the different organizations**
Operating Reserve - Spinning and Supplemental	☐ Delete ☐ Add ☒ Modify	**The difference of these two are not clear.**
Regional Reliability Organization	☐ Delete ☐ Add ☒ Modify	**Use "RRO" in acronym**
Reliability Authority	☐ Delete ☐ Add ☒ Modify	**Use "RA" in acronym.**

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Bill Dearing**	
Organization:	**P.U.D. #2 of Grant County**	
Telephone:	**509-754-5088 Ex. 2105**	
Email:	**bdearin@gcpud.org**	
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☐ Agree.

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Comments

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Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Reliability Authority	☐ Delete ☐ Add ☒ Modify	**The current context doesn't match up with the RA/RC changes in this posting. Add "The RA will either have, or arrange through the RC a wide area view of the**
Reliability Authority (Continued)	☐ Delete ☐ Add ☐ Modify	**Bulk Electric System**
Reliability Coordinator	☐ Delete ☐ Add ☒ Modify	**Add RC abbreviation. Strike "the highest level of all entities." Add "or between multiple Reliability Authority Area" at the end of the definition**
Reportable Disturbance	☐ Delete ☐ Add ☒ Modify	**Fix reference to "Control Area." First sentence is redundant to the third sentence**
Reportable Disturbance	☐ Delete ☐ Add ☒ Modify	**Add ", and shall include events that cause an ACE change greater than, or equal to, 80% of a Balancing Authority, or Reserve Sharing Group's MSSC" to end**
TLR Log	☐ Delete ☐ Add ☐ Modify	**Need to define TLR**
Transmission Operator, Transmission Operator Authority	☐ Delete ☐ Add ☒ Modify	**Include Acronyms**
Transmission Owner, Transmission Service Provider	☐ Delete ☐ Add ☒ Modify	**Include Acronyms**
Wide Area	☐ Delete ☐ Add ☒ Modify	**Should read "Wide Area View." We propose the following for a definition: "Two or more Balancing Authority Areas that include critical flow and status**
Wide Area (continued)	☐ Delete ☐ Add ☐ Modify	**Information from adjacent Reliability Authority Areas as determined by detailed system studies to allow the calculation of IROL**

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **WECC Operations Training Subcommittee**

Lead Contact: Hank LuBean, Douglas County PUD

Contact Organization: WECC

Contact Segment: 2

Contact Telephone: 801-582-0353

Contact Email: mike@wecc.biz

Additional Member Name	Additional Member Organization	Region*	Segment*
Rod Brynell	BCTC	WECC	1
Glen Pederson	SPR	WECC	1
Richard Krajewski	PNM	WECC	1
John Phipps	CISO	WECC	2
Tessia Park	IPC	WECC	1
Brian Tuck	BPA	WECC	1
Don LaDue	PG&E	WECC	4
Robert Eubank	TSGT	WECC	4
Gary McVay	CMRC	WECC	2
Robert Baldwin	SCE	WECC	4
Robert Williams	PAC	WECC	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

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054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

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055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
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Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

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Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

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☐ Would not approve the standards.

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Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

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Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
31.0	☐ R ☐ M Number	**APPLICABILITY – the Reliability Coordinator is not listed. The RC must be part of the Functional Model, as Standard 36 properly recognizes by referring to the RC. Standard 31 should include the RCs under "Applicability" otherwise there is no requirement for RCs to have a formal training program. Standard 36 simply refers to RCs being "adequately trained."**
31.0	☒ R ☐ M Number 1	**R1 indicates the Standard applies to the RA, TO and BA that are involved EITHER with a) or b) which is consistent with the draft of Standard 32 dealing with operator certification requirements. While OTS does not support the language used in Standard 32 for certification, we support the concept that a training program should be required of all entities with system operators that perform either a) or b).**
31.0	☒ R ☐ M Number 1.2	**The Reset Period of this Standard is "One-calendar year." The OTS recommends R1.2 be modified from "five days per year" to "five days per calendar year" to be more specific.**
31.0	☒ R ☐ M Number 1.2	**R1.2 modifies the Recommendation 6 approved by the NERC Board of Trustees on February 10, 2004. Greater clarity of the recommendation has been needed since it was approved and Version 0 should be the vehicle to accomplish this. It is noted the Recommendation 6 sentence, "This system emergency training is in addition to other training requirements" has been omitted, and OTS supports this change.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
32.0	☒ R ☐ M Number 1.0	**Policy 8.C (Certification) reads "shall staff operating positions that meet both of the following criteria with NERC-Certified System Operators." The language in R1 is "that meet either one or both of the following criteria." This has the potential to significantly increase the number of system operators required to be NERC-certified, and is not in the spirit of the Version 0 Standard development of reformatting existing Policies into Standards while making few if any changes in meaning (cont)**
32.0	☒ R ☐ M Number 1.0	**This type of change should be part of the Version 1 development, allowing the industry full opportunity to understand and comment. It should be noted this change was part of Draft 1 and we do not see where the Standard Drafting Team responded to comments submitted by several entities with this same concern.**
32.0	☐ R ☒ M Number 1.a	**M1.a indicates that "Trainees may perform critical tasks only under the direct, continuous supervision and observation . . ."What constitutes a "critical task?" What duties performed in a typical control center are not "critical?" Inclusion of "critical tasks" is most likely a reference to the Critical Task List that has been established to guide operators in determining which of the four certification credentials (BIO, TO, BIT, RO) they are required to attain. (cont)**
32.0	☒ R ☐ M Number 1.0	**The OTS suggests the reference to "critical tasks" be removed to prevent possible interpretation that the uncertified operator can perform routine tasks but not "critical" tasks. Or, change it to reference the Critical Task List of the credential and include it in the Standard.**
32	☐ R ☐ M Number	**COMPLIANCE MONITORING PROCESS - It isn't clear what is meant by "previous calendar year staffing plan." A "staffing plan" sounds like a plan for staffing – if so, what does that have to do with filling operating positions with certified operators? A simple determination of which positions require certified operators should be sufficient. Need to modify to be clear.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
36.0	☒ R ☐ M Number 1.0	**The Reliability Coordinator must be part of the Functional Model, as Standard 36 properly recognizes. RCs should be included in Standard 31, or the requirements of Standard 31 should be repeated in this Standard, otherwise there is no requirement to have a formal training program since Standard 36 simply refers to RCs being "adequately trained." This is major omission with respect to the RCs.**
36.0	☒ R ☐ M Number 1	**Standard 31 modifies the Recommendation 6 approved by the NERC Board of Trustees on February 10, 2004. Greater clarity of the recommendation has been needed since it was approved and Version 0 should be the vehicle to accomplish this. Standard 31 omits the Recommendation 6 sentence, "This system emergency training is in addition to other training requirements" and OTS supports this change. (cont)**
36.0	☒ R ☐ M Number 1	**However, Standard 36 doesn't make the same change when it states the requirement is "in addition to other training required." Why the difference? The OTS believes the RCs should be required to have a training program as stated in our comments on Standard 31, and does not see any reason to include the "in addition to other training requirements" for the RCs.**
36.0	☐ R ☐ M Number	**Standard 31 has a Reset Period of "One-calendar year" for this requirement and OTS suggested a slight change in the language. The Compliance Monitoring Process for Standard 36 indicates "Not Specified." The OTS recommends the Reset Period be defined and include the same modification as in Standard 31, that "five days per year" be changed to "five days per calendar year."**
36.0	☐ R ☐ M Number	**Comment – Why are Measures, Compliance Monitoring, and Levels of Non-Compliance still "Not Specified?" This is Draft 2 of the Version 0 Standards and it is expected the Standards would be fully developed by now in order for the industry to comment. What are the issues causing these parts of the Standard to remain not specified?**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Jean-Marie Gagnon**	
Organization:	**Hydro-Québec TransÉnergie**	
Telephone:	**514-289-2211 ext. 2616**	
Email:	**gagnon.jean-marie@hydro.qc.ca**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments
See NPCC position on the subject.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

I do not agree that the Guides did go true a rigorous comment process because most of the discussion was on the standard (S) and the Measurements (M). So I think the Guides do not need to be included.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

The idea of Version 0 was to translate the existing standards and not to exclude standards. I understand however that Version 0 is also to establish a set of standards that could become the base for enforcement standards. So I suppose that the Phase III and Phase IV standards that have not been field test may not be ready to provide enforceable standard.

At the same time, several of these standards or measures are at the hart of August 14th recommendations. So we must develop them on a fast track or as Urgent action SARs.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

As TTC and TRM are clear reliability requirements, I think that ATC and CBM are business related issues and should be transferred to NAESB.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
CBM are business related issues and should be transferred to NAESB.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
TRM are clear reliability requirements.

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments
It appears that the question being posed is incorrect. There is no mention of "Distribution Provider" in standard -060 (Facility Ratings).

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
SPS	☐ Delete ☐ Add ☒ Modify	**Depending if the action is local or remote, I think that Undervoltage load shedding could be classified as an SPS.**
BES	☐ Delete ☐ Add ☒ Modify	**As proposed by NPCC, the difinition should be base on adverse impact.**
Cascading	☐ Delete ☐ Add ☒ Modify	**Cascading should be defined not only on widespread interruption but also on adverse impact on the Electric system (the size of impact defined on a Region basis)**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
Deal with it later.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments
See Question 11 for details.

Question 11:

Are there any "show stoppers" in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

The Standards must clearly indicated that the Bulk Electric System must be defined on a Regional basis and be based as proposed by NPCC on adverse system impact. The NERC definition of BES and cascading is to vague or general to be applied.

As proposed by the PSTF, I agree with reinstating the "Applicable To" category in the Version 0 standards.

As proposed by the PSTF, I agree to maintain a standard statement (goal or objective) separate from the standard requirements. Combining the standard statement with the requirements (which is not even true) has in most case completely change the intent of the original standard. A good example of it is the Standard 54. While S1 and S2 in the original Standard I.E Transfer Capability was requesting TTC to comply with Categories A, B and C of Table 1, Standard 54 put the requirements on documentation, methodology, review, etc.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

I think in many case, that the translation team by merging the Ms of the original standard as the requirements of the new standard has changed future compliance requirements from Reliability to a quality control process. Before we were saying the System must comply to this. Now we say: show me the study report. If not, you are not compliant. It is not the same I think.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

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Draft 2 of Proposed Version 0 Reliability Standards

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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Dean Schiro**	
Organization:	**Xcel Energy**	
Telephone:	**612-337-2376**	
Email:	**dean.e.schiro@xcelenergy.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☒	1 - Transmission Owners
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☒ Agree.

☐ Disagree.

Comments
Xcel Energy agrees as long as the use of Reliability Coordinator is carried through to all NERC processes which includes the Functional Model.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

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Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

Xcel Energy agrees that guides are an useful tool and to include guides as attachments as long as it is clearly identified that the guides as just that guides and are not requirements.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

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Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Xcel Energy supports the decision to exclude these standards from Version 0. Xcel Energy also strongly supports the recommendation to utilize the SAR process (regular or urgent) to create complete agreed upon standards as they are critical to system reliability and for that reason they should be complete and correct.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Xcel Energy believes that for Version 0 it is appropriate to leave these items in the NERC Reliability arena. However, Xcel Energy expects that, soon after Version 0 is completed, NAESB and NERC should collaborate on additional requirements to ensure that the business issues related to these items are addressed.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments
Xcel Energy believes that for Version 0 it is appropriate to leave these items in the NERC Reliability arena. However, Xcel Energy expects that, soon after Version 0 is completed, NAESB and NERC should collaborate on additional requirements to ensure that the business issues related to these items are addressed.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments
Xcel Energy believes that for Version 0 it is appropriate to leave these items in the NERC Reliability arena. However, Xcel Energy expects that, soon after Version 0 is completed, NAESB and NERC should collaborate on additional requirements to ensure that the business issues related to these items are addressed.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☒ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Xcel Energy would also encourage the continued use of the EFFECTIVE DATE section in each standard.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Xcel Energy would approve given that the comments on this draft are addressed. This includes those on the phase III and IV standards.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Xcel Energy would like to see a consitency in the way that terms are defined. Currently draft 2 has some terms defined in the standards and in the glossary. All terms should be defined in one place that being the glossary and remove the definitions from the standards. Xcel Energy would also like to see a consitency between the standards and other areas of NERC, for instance including Reliability Coordinator in the Functional Model.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
1.0	☐ R ☒ M Number 1.0	**Calculation for CPS1 should not include the character % after the number 100.**
1.0	☐ R ☐ M Number	**Attachment 001-1: In the description for the variable V in the CPS2 Data table, Number of incidents per hour should be changed to per month. Same for description of variable U**
2.0	☐ R ☒ M Number 1.0	**In the section defining the variables to calculate percentage recovery, the second ACE_M should be ACE_m.**
2.0	☐ R ☒ M Number 1.0	**In PSRD 2.3, The ACE_m starting the second sentence should read ACE_M**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

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ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Martin Huang**	
Organization:	**BCTC**	
Telephone:	**604-699-7428**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☒	1 - Transmission Owners
☐ ECAR	☐	2 - RTOs, ISOs, Regional Reliability Councils
☐ FRCC	☐	3 - Load-serving Entities
☐ MAAC	☐	4 - Transmission-dependent Utilities
☐ MAIN	☐	5 - Electric Generators
☐ MAPP	☐	6 - Electricity Brokers, Aggregators, and Marketers
☐ NPCC	☐	7 - Large Electricity End Users
☐ SERC	☐	8 - Small Electricity End Users
☐ SPP	☐	9 - Federal, State, Provincial Regulatory or other Government Entities
☒ WECC		
☐ NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
Should be less confusing.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Alternative B allows the Reliability Coordinator/Authority or Transmission Operator to determine the deviation when transmission is constrained.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Disturbance Control Standard	☐ Delete ☐ Add ☒ Modify	**Missing abbreviation DCS. The definition should be TBD.**
Operating Reserve	☐ Delete ☐ Add ☒ Modify	**Definition for OR in the IOS document may be better. It is not clear what is the linkage between OR and local area protection.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
Just might be less confusing in order to get the standards done under a tight timeline.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☒ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
No show stoppers.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Mapping of the Operating Policies is useful.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
001	☒ R ☐ M Number 1.0	**Epsilon 1^2 changed from "….frequency bound.." to "…frequency bandwidth" but not changed anywhere else.** **CPS2 Data V should be for "absolute value of ACE clock-ten-minutes is greater …"**
002	☐ R ☒ M Number 1.0	**Missing graph with ACE< 0. Should delete second reference to ACEM that "is the minimum algebraic value of ACE…" and all subsequent reference to ACEm since the purpose of this standard applies to loss of generation, not load.**
003	☒ R ☐ M Number 1.0	**Standard is translated correctly. Utility with variable freq. bias may still misrepresent their freq. bias for a significant part of the year due to the requirement for "monthy average Freq. Bias Setting that is at least 1%" of yearly peak demand.**
004	☐ R ☐ M Number	**None**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
005	☐ R ☐ M Number	**None**
006	☐ R ☐ M Number	**None**
007	☐ R ☐ M Number	**None**
008	☒ R ☒ M Number 1.0	**R1 and M1 both requires the Reliability Coordinate be informed of any IROL or SOL violation but the level of non-compliance only applies when the limit is exceeded more than 30 minutes and none for failure to report the violation.**
009	☐ R ☐ M Number	**None**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
010	☐ R ☐ M Number	**None**
011	☐ R ☐ M Number	**None**
012	☐ R ☐ M Number	**None**
013	☐ R ☐ M Number	**None**
014	☐ R ☐ M Number	**None**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
015	☐ R ☐ M Number	**None**
016	☐ R ☐ M Number	**None**
017	☐ R ☐ M Number	**None**
018	☐ R ☐ M Number	**None**
019	☐ R ☐ M Number	**None**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
020	☐ R ☐ M Number	**None**
021	☐ R ☐ M Number	**None**
022	☐ R ☐ M Number	**None**
023	☐ R ☐ M Number	**None**
024	☐ R ☐ M Number	**None**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
025	☐ R ☐ M Number	**None**
026	☐ R ☐ M Number	**None**
027	☒ R ☐ M Number 10.5	**R10.5 should not include d). Part d) should be under a separate R10.6 because it is not necessary a condition for resynchronizing isolated area(s), and is therefore a better translation of Policy 5E. 1.**
028	☐ R ☐ M Number	**None**
029	☐ R ☐ M Number	**None**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

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A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Bill Bojorquez**	
Organization:	**ERCOT**	
Telephone:	**512 248 3036**	
Email:	**bbojorquez@ercot.com**	
NERC Region		**Registered Ballot Body Segment**
☒ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☒	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments
No comment

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

The Applicability of this standard has been and should continue to be with the Transmission Operator. While ERCOT serves as the Planning Authority in the functional model, it does not have the resources required to perform these assessments - the Transmission Owners will continue to perform all of the detailed assessments. Assigning the responsibility to both the Planning Authority and the Transmission Owner will lead to confusion as to who is really responsible.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments
No comments.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☒ Do not agree with dropping these planning standards from Version 0.

Comments

If these standards are to be dropped, a process needs to be adopted to address these standards in a timely manner (less than 1 year).

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

No comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments
No comment

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments
No comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any "show stoppers" in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

The assignment of transmission assessment functions to multiple parties would prevent ERCOT from approving the Planning Standards. Assigning responsibility of assessments to multiple parties is very confusing and will lead to duplicative and/or incomplete reports. ERCOT recommends the Transmission Owner continues to serve this function, or that the Reliability Authority is assigned responsibility to oversee the compliance of these requirements by the Transmission Owners.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	**All specific comments were previously submitted and included in the filed enclosed.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Narinder K. Saini**	
Organization:	**Entergy Services**	
Telephone:	**870-543-5420**	
Email:	**nsaini@entergy.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☒ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☒ Disagree.

Comments

Entergy does not agree with the proposed change, as currently drafted, for two reasons. First, the inclusion of an entity not in the Functional Model and with no defined "functions", "Reliability Coordinator", in the standards has added more confusion and made the division of reliability functions less clear than the previous draft. Second, Entergy is also concerned that the inclusion of Reliability Coordinators in the standards, combined with limits on who can qualify as a Reliability Coordintator, effectively forces local electric utilities and control area operators to involuntarily surrender reliability responsibilities to an RTO-type organizational structure. NERC should not seek to propose such a drastic restructuring requirement through these standards. In sum, although the proposed change was apparently motivated by a desire to reduce confusion and minimize disruptions, it will actually only increase the likelihood of both and, therefore, must be modified.

The proposed change replaces many references to "Reliability Authority" in Draft 2 of Version 0 of the Operating Standards with the term "Reliability Coordinator." However, the Operating Standards nor the Functional Model never actually define the term "Reliability Coordinator" and, consequently, the lack of a definition increases the likelihood of confusion. Moreover, the definition of a Reliability Coordinator in NERC Policy 9 only adds to this confusion. A Reliability Coordinator under NERC Policy 9 is defined as, among other things, "[t]he entity that is the highest level of authority who is responsible for the reliable operation of the Bulk Electric System . . . " Similarly, a Reliability Authority in the NERC Functional Model is defined as, among other things, "[t]he entity that is the highest level of all responsible entities." To the extent the existing

definition of Reliability Coordinator in NERC Policy 9 was intended apply when that same term is used in the Operating Standards, then the Operating Standards appear to designate two different entities as having the "highest" level of authority over reliability-related matters. This is internally inconsistent and only adds confusion to the question of which entity is ultimately responsible. This ambiguity is so severe that it is difficult to provide meaningful comments on the proposed change, without guessing as to what the proposed change actually means. We provide such comments below based on what we believe the proposed change means, but we also recognize that the impact of the proposed change is by no means clear.

Entergy's second objection to the proposed change is based on the assumption that inclusion of the term Reliability Coordinator in Draft 2 of the Operating Standards was intended to establish the Reliability Coordinator – not the Reliability Authority – as the supreme authority on all reliability matters. This is of particular concern in light of the letter to regional managers concerning functional registration, which states that, "[a]ll organizations that serve as the existing Reliability Coordinators, and only those organizations, should register as Reliability Coordinators...." Thus, it appears that the proposed change – combined with the limit on who can be a Reliability Coordinator – could force local electric utilities and control area operators to transfer authority and control over reliability matters to one of the limited number of entities that qualify as Reliability Coordinators.

Such a result – whether intentional or not – is wrong and unproductive for a number of reasons. It must be recognized that entities such as control area operators and local electric utilities that are not Reliability Coordinators have traditionally retained the responsibility, authority, and control of the electric system to serve load. This responsibility, authority, and control is granted in part by the local regulatory authorities and in part by ownership of transmission facilities and is accompanied by liability for electric system operations.

In certain regions of the country, local electric utilities and control area operators have voluntarily transferred control over certain reliability-related functions to RTOs or have been required to do so by local regulators. However, in other areas of the country, the responsibility, authority, and control of the electric system remains with the local electric utility or control area operator in part because local regulators have not yet saw fit to transfer this responsibility to RTOs. Although many of these utilities and control area operators have delegated certain reliability-related functions to a Reliability Coordinator, these delegations have been voluntary and the ultimate responsibility continues to reside with the local electric utility or control area operator.

To the extent the proposed change is designed to force Reliability Authorities (such as local electric utilities and control area operators) to surrender responsibility for reliabiliaty-related functions to a limited number of Reliability Coordinators, Draft 2 of the Operating Standards is inconsistent with the determination of those local regulators, electric utilities, and control area operators that have concluded that such matters should not be forcibly delegated to RTOs or other similar structures. Attempting to overturn this determination through a NERC Operating Standard exceeds NERC's authority to draft such standards and will likely lead to protracted litigation over such a radical change. In any event, it will hardly reduce "disruptions" associated with compliance and in fact will have the opposite effect.

To address this problem, Entergy believes that NERC must eliminate the ambiguity created with the proposed change and adopt Operating Standards that allow for flexibility in organizational structures, without mandating one particular structure for all regions of the country. One way to achieve this goal would be to retain the Reliability Coordinator term in the Operating Standard, but include a new definition for Reliability Coordinator. For example, the Reliability Coordinator could be defined as, "the entity with responsibility and authority to perform reliabilty-related tasks delegated to it by one or more Reliability Authorities." This definition would make clear that the

Reliability Authority is the "highest" authority over reliability matters, but that individual Reliability Authorities may voluntarily delegate this authority to Reliability Coordinators. In the event that no delegation occurs, the Reliability Authority would remain responsible.

Another way to address the flaws in the proposed change would be to return to the approach adopted in Draft 1, where Reliability Authorities – which includes RTOs, local electric utilities, or control area operators – would retain the highest level of authority. A Reliability Authority could then delegate reliability functions – such as Reliability Coordinator functions – depending on the organizational structure in place in its particular region. Under this approach, the term Reliability Coordinator would be deleted from the Operating standards, and Reliability Authority would be re-inserted. The comment in Standards 33 Version 0 Draft 1 that begins "For areas that intend to assign Reliability Authority functions to current control areas...." would be re-inserted and highlighted. Entergy prefers this second approach to address these flaws in Draft 2.

Further, NERC should not preclude certain types of entities – such as control area operators or electric utilities – from registering as a Reliability Authority

Without either of these modifications to the proposed change, Entergy would have to reconsider approving these standards.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
See comments in response to Question 1.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

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R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Entergy encourages the drafting team to make changes in current policy to correct known deficiencies. The proposal in Alternative B acknowledges that larger transactions have greater impact on reliability than a smaller transaction. The lower threshold for larger transactions will benefit reliability.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

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- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

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- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Entergy believes that the transmission capacity available to the market place is a reliability issue. Therefore, TTC/ATC calculation methodology should remain in NERC Version 0 standards.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments
Current policies do not include Distribution Provider, therefore, these should not be included included in NERC version 0 standards.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Having the Reliability Coordinator take over functions of the Reliability Authority may be a show stopper for Entergy.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
1.0	☒ R ☐ M Number 1.0	**Convert ∈ symbol to epsilon in formulas similar to the changes made in the text.**
001	☒ R ☐ M Number 2.0	**Explain or spell out RMS**
1.0	☐ R ☒ M Number	**The last paragraph, which discusses Supplemental Regulation Service, seems to belong in the requirements section, not as part of M2.**
1.0	☐ R ☐ M Number	**Attachment 001-1: For the description of epsilon, change [bound] to [bandwidth] to be consistent with the revision made to R1.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
2.0	☐ R ☐ M Number	**Purpose: Change [to ensure the Balancing Authority] to [to ensure that each Balancing Authority]**
2.0	☐ R ☐ M Number	**Applicability: Periods are unnecessary following listed entities. This is a general comment for all such sections.**
2.0	☒ R ☐ M Number	**Inconsistent font usage.**
2.0	☒ R ☐ M Number 5.0	**The phrase [fully implmented, and within] is used twice. In each case, no comma is necessary.**
2.0	☐ R ☒ M Number 1.0	**Reference is made to the illustration to the right, but the illustration is below.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
2.0	☐ R ☐ M Number	**Levels of Non-Compliance: Most Servere Single Contingency should not be capitalized.**
3.0	☒ R ☐ M Number 1.0	**Change [by January 1 of each year] to [before the end of each year.] As written, it sounds as if BA's have only one day to review their settings.**
3.0	☒ R ☐ M Number 1.0	**Change [The Balancing Authority] to [Each Balancing Authority]**
3.0	☒ R ☐ M Number 1.0	**Area is not a defined term. Use Balancing Authority Area if that is the intent.**
5.0	☐ R ☐ M Number	**Purpose: Change [the Regulating Reserve] to [Regulating Reserve]**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
5.0	☒ R ☐ M Number 1.0	**Change Balancing Area to Balancing Authority Area**
7.0	☒ R ☐ M Number 6.0	**Change Area to Reliability Area**
53.1	☐ R ☒ M Number 1.2	**Omit [they] following [inspection evidence that]**
53.2	☒ R ☒ M Number	**Several instances where [and] should be replaced by [or] when listing functional model entities in R2.2, M2.1 and M2.2**
53.2	☒ R ☐ M Number 2.2	**Omit [Council] at end of paragraph as it was replaced by [Organization]**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
54.1	☒ R ☐ M Number 1.1	**[how] should not be deleted from subsection d**
54.1	☒ R ☐ M Number 1.1	**Replace [Indication that] with [Indication of the] in subsection f**
55.1	☒ R ☐ M Number 1.1	**Requirement has several references to [transmission provider's] in subsections e, f, and g that should be replaced by [Transmission Service Provider's]**
56.1	☒ R ☐ M Number 1.1	**Reference to [Region's] that should be changed to [Regional Reliability Organization] or not capitalized**
56.1	☒ R ☐ M Number 1.1	**[Load distribution error] in subsection c after [Aggregate load forecast error] needs to be its own bulleted point**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
56.1	☐ R ☐ M Number	**Do not delete [methodology] from Non-Compliance Level 1**
56.2	☒ R ☐ M Number 2.1	**[Available Transfer Capability] should be [Transmission Reliability Margin] in subsection c**
56.2	☐ R ☐ M Number	**Reference to [Region's] that should be changed to [Regional Reliability Organization] or not capitalized in Non-Compliance Level 4**
58.1	☒ R ☐ M Number 1.1	**[Regional] in R1-1; functional model entity or unnecessarily capitalized?**
58.0	☐ R ☐ M Number	**058.2 and 058.3 Compliance Monitoring Process Timeframes need to say [Data requirements and reporting procedure available on request: 5 business days] like 058.4, or use new wording in 058.1 [As specified within the applicable reporting procedures]**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.3	☒ R ☐ M Number 3.1	**[Regional] in R3-1; functional model entity or unnecessarily capitalized?**
58.3	☒ R ☐ M Number 6.1	**Reference to Reliability Standard 058-R4 in sections 058.3-R3-1 and 058.3 Levels of Non-Compliance should be 058.4-R4**
58.6	☒ R ☐ M Number 6.1	**[send] should be [and]**
58.6	☒ R ☐ M Number 6.2	**R6-2 is listed as a separate requirement but a similar statement in R5-1 is not defined as a separate requirement**
51.1	☒ R ☐ M Number 1.1	**R1-1 Bullet number one: Is the text (entity performing the study) the same as (responsible entity) found in 058.2, R2-1 bullet number 2? If so please be consistent in the terminology to avoid confusion.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.1	☒ R ☐ M Number 1.1	**R1-1 Bullet number six: To be consistent with R2-1 bullet number six, the words (and evaluated) should be added after (Be performed).**
51.2	☒ R ☐ M Number 2.1	**R2-1 c) Add the words (of Table 1) after the words (following Category B).**
51.2	☒ R ☐ M Number 2.2	**R2-2 Make (Authorities) and (Planners) singular to be consistent with other sections of standard.**
51.3	☒ R ☐ M Number 3.1	**R3-1 c) Add the words (of Table 1) after the words (following Category C).**
51.3	☐ R ☐ M Number	**Compliance Monitoring Responsibility: Add the sentence (Each Compliance Monitor shall report compliance and violations to NERC via the NERC Compliance Reporting Process).**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.0	☐ R ☐ M Number	**Table 1: (1) Footnote c) should be removed since the definition of Cascading is in the glossary. (2) Footnote g) does not have a corresponding notation in Table 1.**
52.1	☐ R ☐ M Number	**Golbal comment: Beginning in this standard and in many of the standards that follow it, no consistency is found in the use of a capital R in the stand alone word regional. Please decide if Regional will be a defined word and capitalize accordingly.**
53.1	☐ R ☒ M Number 1.2	**M1-2: The second line of the paragraph contains two pronouns (they it) in that word order in the sentence. Please delete one.**
53.2	☒ R ☒ M Number	**Global comment: (1) In standard 053.2 and following standards, the use of and instead of or in the text (The Planning Authority, Transmission Planner, Generation Owner, Transmission Owner, Load Serving Entity, and Distribution Provider) implies an action taken together. Using or would be more correct. (2) Use of the indefinite pronoun its in conjuction with a plural subject (the text of the first part of this comment) is inappropriate.**
53.2	☐ R ☒ M Number 2.2	**M2-2: If the word and is not replaced by or then its should be their and assessment should be plural.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
54.0	☐ R ☐ M Number	**Purpose: The parenthetical text at the end of the paragraph is not a complete sentence and does not make sense as written.**
54.1	☒ R ☐ M Number 1.1	**[explaining how] should not be deleted from subsection d**
54.1	☒ R ☐ M Number 1.1	**R1-1 e) This item contains three time frames and should be broken down into three separate items.**
54.1	☒ R ☐ M Number 1.1	**Replace [Indication that] with [A narrative explaining the] in subsection f**
54.1	☐ R ☐ M Number	**Compliance Monitoring Process: Timeframe: Remove current sentence and replace with (No timeframe requirement in version zero).**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
54.3	☐ R ☐ M Number	**Compliance Monitoring Process: Timeframe: Remove current sentence and replace with (No timeframe requirement in version zero).**
55.1	☐ R ☐ M Number	**Compliance Monitoring Process: Timeframe: Remove current sentence and replace with (No timeframe requirement in version zero).**
55.2	☒ R ☐ M Number 2.1	**R2-1 d), R2-2, R2-3: These three sections do not appear to contain any substative differences. Please clarify the sections so that the differences are more obvious.**
55.4	☐ R ☐ M Number	**Compliance Monitoring Process: Timeframe: After the text presently in the standard, add the words (the documentation shall be posted on a website accessible by the Regional Reliability Organizations, NERC and the transmission users in the electricity market).**
56.1	☐ R ☐ M Number	**Compliance Monitoring Process: Timeframe: Remove current sentence and replace with (No timeframe requirement in version zero).**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Narinder K. Saini**	
Organization:	**Entergy Services**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☒ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☒ Disagree.

Comments

Entergy does not agree with the proposed change, as currently drafted, for two reasons. First, the inclusion of an entity not in the Functional Model and with no defined "functions", "Reliability Coordinator", in the standards has added more confusion and made the division of reliability functions less clear than the previous draft. Second, Entergy is also concerned that the inclusion of Reliability Coordinators in the standards, combined with limits on who can qualify as a Reliability Coordintator, effectively forces local electric utilities and control area operators to involuntarily surrender reliability responsibilities to an RTO-type organizational structure. NERC should not seek to propose such a drastic restructuring requirement through these standards. In sum, although the proposed change was apparently motivated by a desire to reduce confusion and minimize disruptions, it will actually only increase the likelihood of both and, therefore, must be modified.

The proposed change replaces many references to "Reliability Authority" in Draft 2 of Version 0 of the Operating Standards with the term "Reliability Coordinator." However, the Operating Standards nor the Functional Model never actually define the term "Reliability Coordinator" and, consequently, the lack of a definition increases the likelihood of confusion. Moreover, the definition of a Reliability Coordinator in NERC Policy 9 only adds to this confusion. A Reliability Coordinator under NERC Policy 9 is defined as, among other things, "[t]he entity that is the highest level of authority who is responsible for the reliable operation of the Bulk Electric System . . . " Similarly, a Reliability Authority in the NERC Functional Model is defined as, among other things, "[t]he entity that is the highest level of all responsible entities." To the extent the existing

definition of Reliability Coordinator in NERC Policy 9 was intended apply when that same term is used in the Operating Standards, then the Operating Standards appear to designate two different entities as having the "highest" level of authority over reliability-related matters. This is internally inconsistent and only adds confusion to the question of which entity is ultimately responsible. This ambiguity is so severe that it is difficult to provide meaningful comments on the proposed change, without guessing as to what the proposed change actually means. We provide such comments below based on what we believe the proposed change means, but we also recognize that the impact of the proposed change is by no means clear.

Entergy's second objection to the proposed change is based on the assumption that inclusion of the term Reliability Coordinator in Draft 2 of the Operating Standards was intended to establish the Reliability Coordinator – not the Reliability Authority – as the supreme authority on all reliability matters. This is of particular concern in light of the letter to regional managers concerning functional registration, which states that, "[a]ll organizations that serve as the existing Reliability Coordinators, and only those organizations, should register as Reliability Coordinators...." Thus, it appears that the proposed change – combined with the limit on who can be a Reliability Coordinator – could force local electric utilities and control area operators to transfer authority and control over reliability matters to one of the limited number of entities that qualify as Reliability Coordinators.

Such a result – whether intentional or not – is wrong and unproductive for a number of reasons. It must be recognized that entities such as control area operators and local electric utilities that are not Reliability Coordinators have traditionally retained the responsibility, authority, and control of the electric system to serve load. This responsibility, authority, and control is granted in part by the local regulatory authorities and in part by ownership of transmission facilities and is accompanied by liability for electric system operations.

In certain regions of the country, local electric utilities and control area operators have voluntarily transferred control over certain reliability-related functions to RTOs or have been required to do so by local regulators. However, in other areas of the country, the responsibility, authority, and control of the electric system remains with the local electric utility or control area operator in part because local regulators have not yet saw fit to transfer this responsibility to RTOs. Although many of these utilities and control area operators have delegated certain reliability-related functions to a Reliability Coordinator, these delegations have been voluntary and the ultimate responsibility continues to reside with the local electric utility or control area operator.

To the extent the proposed change is designed to force Reliability Authorities (such as local electric utilities and control area operators) to surrender responsibility for reliabiliaty-related functions to a limited number of Reliability Coordinators, Draft 2 of the Operating Standards is inconsistent with the determination of those local regulators, electric utilities, and control area operators that have concluded that such matters should not be forcibly delegated to RTOs or other similar structures. Attempting to overturn this determination through a NERC Operating Standard exceeds NERC's authority to draft such standards and will likely lead to protracted litigation over such a radical change. In any event, it will hardly reduce "disruptions" associated with compliance and in fact will have the opposite effect.

To address this problem, Entergy believes that NERC must eliminate the ambiguity created with the proposed change and adopt Operating Standards that allow for flexibility in organizational structures, without mandating one particular structure for all regions of the country. One way to achieve this goal would be to retain the Reliability Coordinator term in the Operating Standard, but include a new definition for Reliability Coordinator. For example, the Reliability Coordinator could be defined as, "the entity with responsibility and authority to perform reliabilty-related tasks delegated to it by one or more Reliability Authorities." This definition would make clear that the

Reliability Authority is the "highest" authority over reliability matters, but that individual Reliability Authorities may voluntarily delegate this authority to Reliability Coordinators. In the event that no delegation occurs, the Reliability Authority would remain responsible.

Another way to address the flaws in the proposed change would be to return to the approach adopted in Draft 1, where Reliability Authorities – which includes RTOs, local electric utilities, or control area operators – would retain the highest level of authority. A Reliability Authority could then delegate reliability functions – such as Reliability Coordinator functions – depending on the organizational structure in place in its particular region. Under this approach, the term Reliability Coordinator would be deleted from the Operating standards, and Reliability Authority would be re-inserted. The comment in Standards 33 Version 0 Draft 1 that begins "For areas that intend to assign Reliability Authority functions to current control areas...." would be re-inserted and highlighted. Entergy prefers this second approach to address these flaws in Draft 2.

Further, NERC should not preclude certain types of entities – such as control area operators or electric utilities – from registering as a Reliability Authority

Without either of these modifications to the proposed change, Entergy would have to reconsider approving these standards.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
See comments in response to Question 1.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Entergy encourages the drafting team to make changes in current policy to correct known deficiencies. The proposal in Alternative B acknowledges that larger transactions have greater impact on reliability than a smaller transaction. The lower threshold for larger transactions will benefit reliability.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Entergy believes that the transmission capacity available to the market place is a reliability issue. Therefore, TTC/ATC calculation methodology should remain in NERC Version 0 standards.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments
Current policies do not include Distribution Provider, therefore, these should not be included included in NERC version 0 standards.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
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Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Having the Reliability Coordinator take over functions of the Reliability Authority may be a show stopper for Entergy.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
56.2	☐ R ☐ M Number	**Compliance Monitoring Process: Timeframe: Remove current sentence and replace with (No timeframe requirement in version zero).**
58.1	☐ R ☐ M Number	**Compliance Monitoring Process: Timeframe: Remove the M in Standard 058.2-R2-M1.**
58.3	☐ R ☐ M Number	**Global comment: Throughout 058.3, the pointers to the standard location (e.g. 058-R4) are incomplete. Please give complete citations.**
58.4	☐ R ☒ M Number 4.1	**M4-1:: Add the words (and shall provide the documentation as specified in Reliability Standard 058.4-R4-2) to the end of the sentence.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.5	☐ R ☐ M Number	**Levels of Non-compliance: A discrepency exists between the second sentence of the paragraph: (Violations will not be assessed for Data Sets posted by the scheduled dates.) and the violation content for both level 1 and level 2. These two levels state that violations exist when the data was submitted by the deadline but was (not fully solved) etc.**
58.6	☐ R ☐ M Number	**Levels of Non-compliance: A discrepency exists between the second sentence of the paragraph: (Violations will not be assessed for Data Sets posted by the scheduled dates.) and the violation content for both level 1 and level 2. These two levels state that violations exist when the data was submitted by the deadline but was (not fully solved) etc.**
61.5	☐ R ☒ M Number 5.1	**M5-1: Change the tense of the verb in the phrase (forecast demand data was.) Data is plural, so the verb should be were.**
61.7	☐ R ☒ M Number 7.1	**M7-1: and the word shall after the term Resource Planner.**
63.1	☒ R ☐ M Number 1.1	**R1-1 b): Change affects to affect. The verb should be plural to match the subject.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
67.1	☒ R ☐ M Number 1.1	**R1-1: (1) The term (underfrequency load shedding) should be capitalized since it is a defined term (Two instances in the requirement.) (2) The word Program should not be capitalized. (Two instances in the requirement.) (3) In sub-section d) the word cause should be causes. (Verb/subject agreement.)**
67.2	☐ R ☒ M Number 2.1	**M2-1: After the words (load shedding program shall) add the words (show evidence of) and change be to being.**
68.3	☒ R ☐ M Number 3.1	**R3-1 b): Pleae provide more detail in the term Standard 51.**
69.2	☐ R ☒ M Number 2.1	**M2-1: Remore the s from (Distribution Providers) to make it consistent with the other nouns.**
70.1	☒ R ☐ M Number 1.1	**R1-1 b): The third sentence in the paragraph should be separate bullet.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
32.0	☒ R ☐ M Number 1.0	**Delete the words (either one or) from seond line or R1, as the original Policy 8C 1 requires both of the criteria to be met to have the NERC certified operators. In fact there is a word and in bold after sub criteria a) in the policy. Theerefore, the proposed language in the standard expands the requirement significantly from the current NERC Policy 8.**
16.0	☒ R ☐ M Number 1.1	**A Generator Operator is not required to identify SOL's, IROL's, regional operating limitations, so how do they know what information is relevant to provide. Shouldn't they just be required to submit the outages and let the Transmission Operator and Reliability Coordinator deal with what is relevant or not? Also, shouldn't someone be responsible for approving the outage of the unit (hopefully before the day before the outage starts).**
17.0	☒ R ☐ M Number 2.1	**How would a Generator Operator know if a relay failure or equipment failure would reduce system reliability (isn't that the responsibility of the Transmission Operator and Reliability Coordinator). This could lead to Generator Operators not informing the Transmission Operator and Reliability Coordinator of relay or equipment failure because they did not think it mattered.**
17.0	☒ R ☐ M Number 2.2	**ow would a Generator Operator know if a relay failure or equipment failure would reduce system reliability (isn't that the responsibility of the Transmission Operator and Reliability Coordinator). This could lead to Generator Operators not informing the Transmission Operator and Reliability Coordinator of relay or equipment failure because they did not think it mattered.**
60.0	☐ R ☐ M Number	**Sometimes the word methodolgy(ies) is used, and sometimes methodolgy(s), word methodology(ies) is correct and should be used.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
61.0	☐ R ☐ M Number	**Delete the word the in the purpose statement.**
61.5	☐ R ☒ M Number 5.2	**Delete the word the in the purpose statement**
61.6	☐ R ☒ M Number 6.1	**Change the word per to phrase (as specified in)**
61.7	☒ R ☐ M Number 7.1	**Change to reflect lanugage in M7-1.**
54.0	☐ R ☐ M Number	**Check Timeframe in Compliance Monitoring Process of 54.1 and 54.3 to ensure that a timeframe is present or that it is clear no timeframe currently exists**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
55.1	☒ R ☐ M Number 1.1	**Subsection a has a deleted [Reliability[that needs to be included**
55.2	☒ R ☐ M Number	**R2-1 d), R2-2, R2-3: These three sections do not appear to contain any substative differences. Please clarify the sections so that the differences are more obvious.**
56.0	☐ R ☐ M Number	**Check Timeframe in Compliance Monitoring Process of 56.1 and 56.2 to ensure that a timeframe is present or that it is clear no timeframe currently exists**
58.5	☒ R ☐ M Number 5.1	**R5-1 needs the second paragraph divided into a second requirement, similar to 58.6-R6.1 and 58.6-R6.2**
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Thomas Mielnik**	
Organization:	**MidAmerican Energy Company**	
Telephone:	**563-333-8129**	
Email:	**tcmielnik@midamerican.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☒	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1-4)

B – Planning Standard (Questions 5 -

C – General Issues Applying to Operating and Planning (Questions

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments
MidAmerican Energy agrees with this new approach of including both Reliability Coordinators and Reliabilty Authorities in the Version 0 Standards. We think it is less confusing and will result in appropriate handling of the Version 0 standards while the industry is in transition.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

MidAmerican Energy supports including guides as an attachment providing the NERC member only needs to consider following the provisions in the attachment. MidAmerican Energy does not support including guides as absolute requirements.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
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- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

MidAmerican Energy fully supports the Working Group's new approach with regard to the Phase III and Phase IV Planning Standards because we believe standards which have either not been revised to include significant comments based upon field testing or which have not been field tested should not be included in the Version 0 Standards. The resulting reduced set of standards will result in enforceable standards that make sense without causing unnecessary hardships or confusion.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

MidAmerican Energy believes that the entire Standard 054 should continue to be included in Version 0, because the entire standard is needed for reliability reasons. However, MidAmerican Energy recognizes that this standard has business aspects associated with it.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
MidAmerican Energy believes that Standard 055.3 is a business practice that is concerned with equity with regard to the use of CBM. It indicates that CBM is only to be used after non-firm is exhausted, that it can only be used for those experiencing generation deficiency, and requires discription of when CBM can be offered for non-firm transmission service. Therefore, we believe that Standard 55.3 primarily deals with business issues and should be provided to the Joint Committee for review and resolution.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
MidAmerican Energy believes that portions of Standard 056.1 are business practices. In c. under R1-1, the standard says, The following components of uncertainty, if applied, shall be accounted solely in Transmission Reliability Margin and not Capacity Benefit Margin. We believe that specifying what uncertainty shall be accounted solely in TRM and not CBM is an equity issue that is more suitable for a business practice. The reason for these words is to differentiate between things that might be thought of as being for the benefit of all market participants, TRM, and things that might be thought of as being for the benefit of generation reserve sharing pool members, CBM. Also, there is a statement that, Any additional components of uncertainty shall benefit the interconnected transmission systems, as a whole, before they shall be permitted to be included in the Transmission Reliability Margin calculations. Again, this statement is clearly an equity issue

not a reliability one. MidAmerican Energy asks that the statement, solely in TRM and not CBM, and the statement, Any additional components of uncertain shall benefit the interconnected transmission systems, as a whole, before they shall be permitted to be included in the Transmission Reliability Margin calculations, be deleted from the standard to result in an R1-1c without business practices. If not, then delete R1-1c. in its entirety and submit to the JIC for consideration as a business practice. R1-1d. requires description of the conditions under which TRM is available to the market as non-firm Transmission service. We believe R1-1d. also is a business practice. Therefore, MidAmerican Energy recommends that R1-1d of 56.1 be deleted and provided to the JIC for consideration as a business practice.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☒ Yes.

☐ No.

Comments

MidAmerican Energy believes that Distribution Provider was NOT added to the list of entities to comply. (The Standard Drafting Team apparently intended to do so.) MidAmerican Energy believes that in certain cases, the Distribution Provider must comply with the standard. So MidAmerican Energy supports adding the Distribution Provider as long as it is clear that it is with regard to facilities that have regional impact such as facilities that are a part of a flowgate and NOT for all distribution facilities owned by the Distribution Provider. MidAmerican Energy recommends that when the Distribution Provider is added, a clear statement be added that facilities below 100 kV are generally not to be covered by the standard.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

MidAmerican Energy agrees that a numbering scheme that provides information on the general category of standard is preferred to a number which has no bearing as to the content of the standards. We encourage the Standards Drafting Team to review the proposed new numbering scheme to make sure that it is flexible for the changes that may occur in the next few years in the industry.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

MidAmerican Energy does not see any show stoppers in Draft 2 Version 0. We are especially supportive of the deletion of the Phase III and Phase IV Planning Standards which we considered our show stopper in Draft 1 Version 0.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

MidAmerican Energy supports MAPP's comments on Question 8. We do not repeat those comments here.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **Idaho Power Company**

Lead Contact: Kent McCarthy

Contact Organization: IPC

Contact Segment: 1

Contact Telephone: 208-388-2565

Contact Email: kmccarthy@idahopower.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Marsha Leese	IPC	WECC	1
Ronald Schellberg	IPC	WECC	1
Bert Gumm	IPC	WECC	1
Tess Park	IPC	WECC	1
Terry Davis	IPC	WECC	1
Lisa Grow	IPC	WECC	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

IPC wishes to maintain functionality and responsibilities it has today while incorporating functional model terminology.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments
IPC supports the ability to have all dynamic transactions tagged.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments
This is additional information on how to meet the standards.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

IPC strongly supports retaining the I.D. Voltage Support and Reactive Power planning standard and recommend the WECC additions be included as soon as possible. If it is not included in Version 0, it is IPC's recommendation that this should be a priority Urgent Action SAR.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

FERC Tariffs and Orders already require the documentation of these calculations therefore standards developed by either NERC or NAESB are redundant. This standard should be deleted and not be retained as part of the reliability standards. Reliability Standards are used to establish TTC, so additional requirements for TTC should be unnecessary. ATC, CBM, and TRM are terms used in the commercial allocation of TTC.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
FERC Tariffs and Orders already require the documentation of these calculations therefore standards developed by either NERC or NAESB are redundant. This standard should be deleted and not be retained as part of the reliability standards. CBM is a term used in the commercial allocation of TTC. Is NERC mandating a requirement that CBM be reserved? If this standard is retained, it should be made clear whether or not CBM is a requirement on NERC members to maintain CBM.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
FERC Tariffs and Orders already require the documentation of these calculations therefore standards developed by either NERC or NAESB are redundant. This standard should be deleted and not be retained as part of the reliability standards. TRM is a term used in the commercial allocation of TTC.

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
SPS	☐ Delete ☐ Add ☒ Modify	**For clarity should retain the existing definition. But if the new definition is kept, correct Also called Remedial Action Scheme to a complete sentence.**
Unaffilated Third Party	☐ Delete ☒ Add ☐ Modify	**Need to define.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments
The treatment of 53, 54, 55, 64 will be a factor in our decision whether to support these stanards.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

If standards were separated into smaller blocks, IPC would feel more comfortable approving those standards which contribute to the reliable operation of the transmission system.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

The introduction in each of the original NERC Standards provided useful back ground information in applying the standards and should be retained as part of each standard. Perhaps this information could be included as a Purpose statement in each standard. The standards could be more succint by combining the requirement to prepare and submit under one requirement instead of two. This appear throughout the standards. For example, see standard 058.1 R1-1 and R1-2.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
8.0	☒ R ☐ M Number 1.0	**If IPC must inform RC anytime IROL or SOL has been exceeded, it would impose a great and unnecessary burden on it. Recommend elapsed time requirement be included.**
6.0	☐ R ☐ M Number	**An inadvertant time-error payback methodology already exists in the WECC and IPC will continue to use it. If Version 0 does not support this methodology, the WECC would likely request a variance.**
10.0	☒ R ☐ M Number	**Requirement R2b. It appears that this requirement changes current policy. We recommend that if a change is necessary you consider allowing for time frames longer than one hour for dynamic or reserve tags that may require longer than one hour for adjustment.**
11.0	☒ R ☐ M Number 1.0	**The existing Policy 3 and E-Tag 1.7 Specification provide for all Generation Providing Entities to receive a copy of the tag and to optionally participate in the approval process. Both NERC's Version 0 standards and NAESB's Companion Business Practices should be reviewed to ensure that this existing capability is retained.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
13.0	☒ R ☐ M Number 5.0	**See prior comments to Dynamics schedules.**
14.0	☒ R ☐ M Number 1.1	**We agree with and support this requirement.**
20.0	☒ R ☐ M Number	**IPC supports the migration of Policy 9 requirements for EEAs into Standard 20.**
22.0	☒ R ☐ M Number	**Attachment 022-1. See comments for std 8, R1.**
31.0	☒ R ☐ M Number 1.0	**R1.1d. Recommend removing requirement that Trainers must be identified in training program.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
39.0	☐ R ☐ M Number	**Figure 2, upper left corner. Change SC to RC.**
51.0	☐ R ☐ M Number	**All of the bulleted items under the 51.x standards are repeated in many places. these items should be be located in one place and references made to the list.**
51.1	☒ R ☐ M Number	**The statement: Be supported by a current or past study and/or system simulation testing that . . . being assessed is confusing. The following is suggested as a replacement: Be supported by a current or past study that demonstrates compliance with Category A of Table 1 for the plan year being assessed.**
51.0	☐ R ☐ M Number	**The introduction in the original NERC Standards provided critical background information in applying the standard and should be retained. These introductions should establish the principle for which the requirement is based. Suggest retaining these introductions in all standards.**
51.2	☒ R ☐ M Number	**The statement: Be supported by a current or past study and/or system simulation testing that . . . being assessed, is confusing. The following is suggested as a replacement…Be supported by a current or past study that demonstrates compliance with Category B of Table 1 for the plan year being assessed.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.3	☒ R ☐ M Number	**The statement: Be supported by a current or past study and/or system simulation testing that . . . being assessed… is confusing. The following is suggested as a replacement…Be supported by a current or past study that demonstrates compliance with Category C of Table 1 for the plan year being assessed.**
51.4	☒ R ☐ M Number	**The statement: Be supported by a current or past study and/or system simulation testing that . . . being assessed…is confusing. The following is suggested as a replacement …Be supported by a current or past study that demonstrates compliance with Category D of Table 1 for the plan year being assessed.**
53.1	☒ R ☐ M Number	**This standard is not focused on interconnected transmission system reliability. Since this standard is covered by the FERC and state juristitions (i.e. 2003/2003A), this standard should eliminated. It has little to do with reliability.**
53.1	☒ R ☐ M Number	**If this standard is kept, R1-1 and R1-2 should be merged. It is difficult to draw a distiction between them.**
53.2	☒ R ☐ M Number R2-1c	**Replace the word cooperated with coordinated.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
54.0	☐ R ☐ M Number	**The last sentence in the Purpose should be deleted as it repeats previously stated information.**
54.1	☒ R ☒ M Number	**This standard should be deleted and not be part of the reliability standards. FERC has already issued orders concerning this standard. The reliability constraint should be that the calculation of the TTC must meet all of the reliability standards. 054.1 as it stands now does not require meeting the standards.**
54.2	☒ R ☒ M Number	**This standard should be deleted and not be part of the reliability standards. FERC has already issued orders concerning this standard. The reliability constraint should be that the calculation of the TTC must meet all of the reliability standards. 054.2 as it stands now does not require meeting the standards.**
54.3	☒ R ☒ M Number	**This standard should be deleted and not be part of the reliability standards. FERC has already issued orders concerning this standard. The reliability constraint should be that the calculation of the TTC must meet all of the reliability standards. 054.3 as it stands now does not require meeting the standards.**
	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.0	☒ R ☐ M Number	**Define whom the Responsible Entity is for providing the data. This appears to be a defined term, but it is not in the Glossary.**
58.0	☒ R ☐ M Number	**Interchange Transactions should be Interchange Schedule.**
	☐ R ☐ M Number	
63.0	☐ R ☒ M Number	**It does not appear that III.A.M2 was translated into the Version 0 standard. There is no principle or mention about the desire to maintain redunancy to meet system performance requirements This appears to be a serious omission, since 60 percent of the disturbances result from relay misoperations.**
68.4	☒ R ☐ M Number 4.2	**The statement: shall provide documentation of the program and its implementation; should be replaced by: shall provide documentation of the maintenance and testing program and its implementation**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
69.1	☐ R ☐ M Number	**Suggest renaming title to Special Protection System Review Procedure.**
69.1	☒ R ☒ M Number	**IPC believes that only SPS with regional impact should have a review requirement.**
70.4	☐ R ☒ M Number 4.0	**As written it is unclear what must be reported as a blackstart unit. IPC intreprets that the house unit at a hydro plant is the blackstart unit and not each unit at the faciltiy.**
61.0	☐ R ☐ M Number	**These requirements are not consistent with current reporting practices in the west. Entities report information to WECC and WECC reports to NERC. What you are asking is the LSA, PA and RP each report to several entities.**
61.7	☒ R ☐ M Number 7.1	**R7-1 and M7-1 are not consistent with respect to whom the data should be reported to. It appears that M7-1 is correct and R7-1 is in error and should be corrected.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
61.0	☒ R ☐ M Number 7.1	**Resource Planner should not be included in this requirement. IPC does not see a need for this.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**H. Steven Myers**	
Organization:	**ERCOT**	
Telephone:	**512-248-3077**	
Email:	**smyers@ercot.com**	
NERC Region		**Registered Ballot Body Segment**
☒ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☒	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☒ Disagree.

Comments
ERCOT believes that only Reliability Coordinators should be included in Version 0 and that the enhancements to accommodate both Reliability Authority and Reliability Coordinator should be taken up in Version 1.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
ERCOT believes that only Reliability Coordinator should be included, not Reliability Authority.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

If these attachments are not included, there must be some deliberate treatment of the information, through Operating Committee or other appropriate action, to ensure that the information is not lost and is distributed to the industry in usable form.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☒ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

No Comment

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments
No Comment

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments
No Comment

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

ERCOT believes that Version 0 should include only the Reliability Coordinator and not both the Reliability Coordinator and the Reliability Authority. Treatment of the Reliability Authority should be taken up in actions for Version 1.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Armando (Armie) Perez, chairman of Planning Standards Task Force (PSTF)**	
Organization:	**Planning Committee/PSTF (submitted by PSTF)**	
Telephone:	**609-452-8060 (NERC office-VCS)**	
Email:	**virginia@nerc.com (Armie is out of the office until Nov. 1, 2004)**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☒ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **Planning Committee/Planning Standards Task Force**

Lead Contact: Armando (Armie) Perez, Chair PSTF

Contact Organization: Planning Standards Task Force

Contact Segment:

Contact Telephone: 609-452-8060 Virginia Sulzberger

Contact Email: virginia@nerc.com (Armie Perez is out of the office until November 1, 2004)

Additional Member Name	Additional Member Organization	Region*	Segment*
Armando J. Perez	CAISO	WECC	
Manjula Datta-Barua	CenterPoint Energy	ERCOT	
John W. Shaffer	Florida Power & Light Co.	FRCC	
Kenneth W. Braerman	Baltimore Gas & Electric	MAAC	
Mahendra C. Patel	PJM Interconnection, LLC	MAAC	
Greogory L. Pieper	Xcel Energy, Inc.	MAPP	
Jeffrey R. Webb	Midwest ISO		
Virginia C. Sulzberger	NERC Staff	NERC	
PC Members (survey respondees)	Various		

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

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Question 1: Reliability Coordinator v. Reliability Authority

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☐ Agree.

☐ Disagree.

Comments
PSTF -- no comment.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

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☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
PSTF -- no comment.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

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R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments
PSTF -- no comment.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

The PSTF agrees to the proposed concept of the guides being attached to the Version 0 Standards if the "SHALL" is replaced by "SHOULD." Guides are not standards, and this concept needs to be made very clear. Guides are for consideration only and are not mandatory.

Similar to the operating perspective, supporting documents in the form of a number of "should be considered" (not shall be considered) guides were developed for each section or category of the planning standards and approved by the Planning Committee and NERC Board along with the planning standards and measurements. These guides, while not mandatory, followed the same development, comment, and approval process as the standards. They are not run-of-the-mill guides, and should be retained for consideration by the users of the Version 0 planning standards.

Guides that have withstood the rigors of the standards process and have been approved by the NERC Board and specifically relate to the standards at hand should be included with the Version 0 standards.

The planning standard guides, which in all cases, are only one or two pages in length, provide additional descriptive and explanatory information, suggestions on good utility practices, and suggestions on the implementation of the standards and their measurements.

A majority of the PC members surveyed and the PSTF recommend that these approved guides be retained and appended to their respective standards, or included as an appendix in the Version 0 standards document (not a separate document).

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
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- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

A majority of the PC members surveyed agreed to drop the Phase III and Phase IV planning standards from the Version 0 standards. Those who agreed to drop these standards also expressed concern that these standards need to be addressed by the industry at the earliest possible date. All PC members surveyed also recognized that these standards were critical in the investigation of the August 14 blackout and the implementation of the post-blackout recommendations that are currently being investigated by several PC subgroups at the NERC board's request.

Some PC and PSTF members do not agree with the characterization by the Standards Drafting Team that all of these Phase III and Phase IV standards are incomplete. Many operating standards have been implemented or are being proposed to be implemented without field testing and are not characterized as incomplete. Further, field testing of standards is not now mandatory in the NERC Standards Development Process. In addition, the Phase III and Phase IV standards, having not been revised along with the other standards proposed for Version 0, have now been automatically held back or placed at a disadvantage compared to the rest of the Version 0 standards.

Therefore, if the Phase III and Phase IV planning standards are to be dropped from Version 0, it is recommended that an industry process be developed and adopted to address these standards in a timely manner (within one year) so that they are modified and approved by the industry at the earliest possible date.

The PSTF recommends the following process to address these Phase III and Phase IV standards and offers the following comments for consideration:

STANDARDS PROCESS

The Phase III and Phase IV standards should not enter the NERC standards development process as either regular Standard Authorization Requests (SARs) or Urgent Action SARs. The PSTF believes that the Phase III and Phase IV standards are well beyond the SAR or Urgent Action SAR steps in the NERC Standard Development Process. The need for and scope of these standards have already been established based on the Planning Committee's and NERC board's approval of these standards and measurements back in 1997.

As a minimum, the Standards Authorization Committee (SAC) should be requested to authorize the Phase III and Phase IV planning standards to be jump started by sending them directly to the standard drafting phase. The SAC should also appoint appropriate standard drafting teams to address these standards, many of which are critical to the reliability of the interconnected systems.

In the case of Phase III, the possibility of a field-test phase should be eliminated as these measurements were already field tested in 2001. Rather, the comments from the 2001 Phase III field tests along with the comments and recommendations from the PC subgroups that have been assigned to review certain of these Phase III planning standards in light of the August 14 blackout recommendations should be addressed by the standard drafting teams. (Consideration should also be given to staffing the drafting teams with several of the members of the respective PC subgroups that are already assigned to conduct detailed reviews of these standards. These teams could also be

supplemented with other industry representatives.) A public posting of the revised draft standards should take place, followed by a formal balloting of the standards.

In the case of the Phase IV standards, the above process should also be followed. Limited, if any, field testing should be considered. In addition, the comments and recommendations from the PC subgroups that have been assigned to review certain of these Phase IV standards should be addressed by the assigned standard drafting teams.

AUGUST 14 BLACKOUT IMPLICATIONS

Many of the Phase III and Phase IV planning standards that have been eliminated from Version 0 are the very standards that are critical to the August 14 blackout follow-on recommendations — voltage support and reactive power, disturbance monitoring equipment and data reporting, verification of generator capabilities, undervoltage load shedding, blackstart capability, automatic load restoration, etc.

The PC subgroups that have been assigned to address the NERC August 14 blackout recommendations, many of which call for a review of existing standards that have now been dropped, are being impacted. Several of these groups, based on their review of the standards, have expressed opposition to the dropping of the Phase III and Phase IV standards. (Several of these PC subgroups are expected to provide comments on the Version 0 standards under separate cover.) The elimination of these standards from Version 0 will likely set back the implementation of the recommendations and lessons learned in the August 14 blackout by a year or more.

BACKGROUND ON PLANNING STANDARDS

All of the eliminated Phase III and Phase IV planning standards and measurements were previously approved by the Planning Committee in July 1997 and the NERC Board in September 1997.

The PSTF believes that the full-scale removal of all of the Phase III standards may not be appropriate. The Phase III planning standards were field tested in NERC's 2001 Compliance Enforcement Program. As a minimum, perhaps a review of the comments by the original standards drafting team on a standard by standard basis rather than the full-scale removal of all of the Phase III standards may be more appropriate.

Of the 30 measurements in Phase III, six have been retained in the Version 0 standards as a result of the compliance template effort associated with recommendation 2c of the NERC blackout recommendations, thereby leaving a number of holes in the planning standards pertaining to disturbance monitoring equipment and data reporting (I.F.), generation control and protection (III.C.), undervoltage load shedding (III.E.), system blackstart capability (IV.A.) and automatic restoration of load (IV.B).

The Phase IV standards have not been field tested. The field testing of NERC's standards is not necessarily mandatory in all cases under the current NERC Standards Development Program. Again, a detailed review of these standards by possibly the original drafting team and others, on a standard-by-standard basis, may be more appropriate than the full-scale removal of all of the Phase IV standards.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

A majority of the PC members surveyed and the PSTF believe that the NERC Planning Standards on TTC/ATC/CBM/TRM are reliability-based standards and should be retained in the NERC Version 0 standards. A minority of PC members surveyed believe that some or a portion of the measurements of these standards may be business related. These members were encouraged to provide their comments directly to the Version 0 Standards Drafting Team.

Following the field testing and minor modifications of the TTC/ATC/CBM/TRM standards in the 2000–2001 timeframe, both the NERC Planning Committee and Market Interface Committee approved these standards as NERC planning standards in January 2002, followed by the NERC Board's approval in February 2002.

The PC members and PSTF recognize that some or a portion of the measures associated with the TTC, ATC, CBM, and TRM standards may be business related but a majority of the measures are believed to be reliability based.

Representatives of the PC, in conjuction with representatives from NAESB, should jointly and carefully review each of the measurements in these standards to identify those requirements that may be considered business practices and which, if any, should be recommended to the Joint Interface Committee for its consideration. If appropriate, certain (or portions thereof) of the measurements that are business practice related should be transferred to NAESB for business pratice development.

The PSTF will provide its specific comments on these standards under separate cover. The most critical comment is that the TTC, ATC, CBM, and TRM terms as defined in the original standards must be retained and not separated from the standards, even though the terms and their definitions may also appear in a NERC Glossary of Terms or other documents. These definitions are central to and the basis for the standards and measurements. Compliance to the definitions of these terms are part of the standard requirements.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
See above response.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
See above response.

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments
060 was intended to apply to the rating of transmission facilities. It is not clear that all of the requirements for transmission facility ratings would automatically apply to distribution facilities without further study.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	**In general, the terms and their definitions as used in the Planning Standards (PL terms) need to be retained.**
	☐ Delete ☐ Add ☐ Modify	**These terms and their definitions were developed through the NERC standards process and approved by the Planning Committee and NERC Board of Trustees. similar**
	☐ Delete ☐ Add ☐ Modify	**to the original existing NERC Planning Standards. Additional comments on these terms will be provided under separate cover. For example, definitions of Area,**
	☐ Delete ☐ Add ☐ Modify	**Transmission Planner, Planning Authority, and Resource Planner need to be modified, added, or expanded for consistency with the Functional Model.**
	☐ Delete ☐ Add ☐ Modify	**In addition, NERC's Regional Reliability Councils should be added to the list of terms in addition to the RRO concept.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

The following global comments are provided for the Version 0 Standard Drafting Team's consideration.

PURPOSE -- The Purpose section of the planning standards should be expanded to include as much of the Introduction sections of the original existing planning standards as possible.

ORIGINAL STANDARD STATEMENTS -- A majority of the PC members surveyed indicated that they would prefer to keep the original standard statement separate from the requirements. Others indicated that including the standard statement in the requirements would be acceptable. If the standard statement cannot be made a separate category of the standards document, then an attempt should be made to keep that umbrella standard statement as the first goal or requirement of the standard, with the original measurements following as the remainder of the standard requirements.

MEASUREMENTS -- More work is needed on the measurements for the Planning Standards. The content and format being followed are confusing and need further clarifications and less repetition.

The measurements are nearly identical to the requirements. Within the measurements there seems to be a formula that M1 requires documentation and M2 requires evidence that documentation was provided. As an example, see III.A.M3.:

M1-1. The Regional Reliability Organization shall have a procedure for the monitoring, review, analysis, and correction of transmission protection system misoperations as defined in Standard 063.1-R1-1.

M1-2. The Regional Reliability Organization shall have evidence it provided documentation of its procedure as defined in Standard 063.1-R1-2.

This structure is redundant and off putting. In this case, the Region would send its procedure to NERC when requested. Must it also send evidence that it sent the procedure to NERC (e.g. certified mail return receipt requested). What if the procedure is not requested. How does the Region provide evidence that it sent the procedure. This format for compliance review seems to be an unnecessary, awkward, and repetitive structure.

TRACKING CHANGES -- More of the PSTF's comments and recommended tracking changes need to be accepted.

APPLICABILITY -- It is recommended that the "Applicable To" category be reinstated in the Version 0 standards format, similar to what was in Version 0 draft 1. As discussed on several occasions, the ability to sort the standards by such a category would be helpful in identifying those standards for which particular groups of users are responsible and for which compliance reviews will be conducted.

From a format perspective, it is important to reinstate this category now rather than try to add it later.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Need to define and agree upon the treatment of the Phase III, Phase IV, and TTC/ATC/CBM/TRM planning standards.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

The original Planning Standards were written from an overall wholistic or total transmission system perspective. An expected standard of performance was established in each of a number of areas with a corresponding number of measurements to be followed to ensure compliance to the standard.

The standards format now being used combines the standards and measurements into a list of requirements without much explanation of why these requirements must be followed and achieved. Further, the breaking up of the planning standards into various phases during the initial NERC compliance programs and the possibly dropping of the Phase III and Phase IV standards have tended to develop a number of holes or lack of continuity in the standards.

At some point, it will be important for a group to look at the whole set of Version 0 planning standards and planning standards under development to ensure that an overall systems approach is reestablished with necessary new standards developed to fill any apparent gaps.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	**The PSTF has provided recommended tracking changes to Version 0 standards 051, 052, 053, 058, 060, 061, 063, 067, 068, and 069. These comments will be provided under a separate email or zip file. (Additional tracking comments will be provided on 054, 055, 056, and 057 on Monday, October 18, 2004.)**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Western Electricity Coordinating Council**	
Organization:	**Reliability Coordination Subcommittee, Lisa Grow, Chair**	
Telephone:	**208-388-2243**	
Email:	**lgrow@idahopower.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☒ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☒	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **WECC Reliability Coordination Subcommittee**

Lead Contact: Lisa Grow

Contact Organization: Idaho Power Company

Contact Segment: 2

Contact Telephone: 208-388-2243

Contact Email: lgrow@idahopower.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Albert Peters	Arizona Public Service	WECC	2
Carl Huslig	WPE	WECC	2
Don Watkins	BPA	WECC	2
John Doudna	CISO	WECC	2
Greg Tillitson	CRMC	WECC	2
Sue Stephens	ANHM	WECC	2
Mark Nielson	IPC	WECC	2
DJ Bernhardsen	PNSC	WECC	2
Brent Roholt	PAC	WECC	2
Terry Baker	PRPA	WECC	2
Robert Temple	RDRC	WECC	2
Ron Butcher	TID	WECC	2
Tim Calkins	WALC	WECC	2
Dave Ambrose	WACM	WECC	2
LeRoy Patterson	WECC	WECC	2
Louise McCarren	WECC	WECC	2
Ken Driggs	WECC	WECC	2

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

This is required for the WECC to support the Version 0 standards. It is critical that the Reliability Coordinator and Reliability Authority remain separate and distinct. Further, the NERC functional model must also have the same distinction to support the operating agreements and practices in the WECC.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

RCS believes it is critical that all dynamic schedules are tagged to ensure the reliability tools such as WebSAS (unscheduled flow mitigation) have a complete data set to ensure appropriate curtailments are made.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

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054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
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	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

The RC v. RA issue must be resolved in a manner that supports the WECC Reliability Plan and Reliability Coordinator Empowerment Agreements.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
31.0	☒ R ☒ M Number	**Add RC to the "Applicability" list, R1 and M1**
32.0	☒ R ☒ M Number	**Add RC to the "Applicability" list, R1 and M1**
0.0	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☒ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

The approach with an RA and RC are necessary to the functional model and this is compatible with the way that we function in the west with control areas as RA's and regional security coordinators as the RC function. We support an RA and RC format.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

The Version zero document was to migrate to functional model terminology. One person may be performing many functions such as a TO or RA and all should be retained. We should leave all functions in and if necessary, or if there is duplication, adjust the functional model to fit the paradigm needed at a later time.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Presently support existing policy as presently stated in alternative A, as alternative B does not meet our requirements. As we move to different methods of processing dynamic schedules we feel that an alternative method should be produced. Also, find that R5.1 with 10% is too restrictive.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

Believe there is a lot of history in the existing policies and the guides to the policies should be included in some form in the standard as supporting documentation. Policy Threeneeds guide to add clarity. Standards need the existing guides for all the policies and should be retained to provide clarity.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments
No comment.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

TRM, CBM, and ATC are part of reliability concerns and these relaiblity issues should not be part of NAESB. Reliability concerns should be addresed first and then decide if there are resultant market issues that should be broken out later. The answer at this time is maybe - in the future we will determine there are resultant items for NAESB to address.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments
Same comment as above

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments
Same Comment

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☐ No.

Comments
No comment.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
All version zero and new documents should have the same format

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Some improvements to the Standards could include an approved method of handling dynamic tags, attaching reference guides to policy, not removing the Transmission Operator. and including RA's and RC's in the Standards.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

There aren't any show stoppers at this time, only would want those items in prior comments addressed.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

None

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
6.0	☐ R ☐ M Number	**SPPC would want to conintue to use the WECC inadvertant time payback methodology. SPPC would want to have WECC reserve the right to request a regional difference if the Version zero standard is in opposition to WECC inadvertant payback procedures.**
10.0	☒ R ☐ M Number 2.0	**Need to allow for times when tags need to be submitted beyond one hour such as dynamic or reserve tags that need adjustment outside a one hour time frame. R2B appears to change current policy which was not in the scope of version zero**
11.0	☒ R ☐ M Number R1	**SPPC believes the generating entity needs to receive the tag. Is the version zero team satisfied that this is covered in the NAESB standard, if not it should be included in the NERC Standard. This should be included in the NERC portion of the standard.**
13.0	☒ R ☐ M Number 5.0	**See prior comments on Dynamic schedules**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
13.0	☐ R ☒ M Number	**The levels of noncompliance are too stringent and should be based on a percentage. The WECC RMS sanctionable criteria has been shown to be equitable and could be used as a model. Following in several text boxes is the suggested criteria which WECC has adopted. There would probably be a request for a regional difference to comply with WECC RMS criteria if NERC criteria is not compatible.**
13.0	☐ R ☒ M Number	**Level 1- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 2% but less than or equal 3% of the total number of tags processed(approved tags plus denied tags) during the calendar month. For tag volumes less than or equal to 500 tags per month the number of noncompliant events was greater than 10 but less than or equal to 15. Level 2- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 3% but les**
13.0	☐ R ☒ M Number	**Level 2- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 3% but less than or equal to 4% of the total number of tags processed during the calendar month. For tag volumes less than or equal to 500 tags per month, the number of noncompliant events was greater than 15 but less than or equal to 20.**
13.0	☐ R ☒ M Number	**Level 3- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 4% but less than or equal to 5% of the total number of tags processed during the calendar month. For tag volumes less than or equal to 500 tags per month, the number of noncompliant events was greater than 20 but less than or equal to 25.**
13.0	☐ R ☒ M Number	**Level 4- For tag volumes of greater than 500 tags per month the number of noncompliant events was greater than 5% of the total number of tags processed during the calendar month. For tag volumes less than or equal to 500 tags per month the number of noncompliant events was greater than 25.**

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Group Comments (Complete this page if comments are from a group.)

Group Name: **NERC CCMC**

Lead Contact: Steve Rueckert

Contact Organization: CCMC

Contact Segment:

Contact Telephone: 801 582-0353

Contact Email: steve@wecc.biz

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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☒ Agree.

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Comments

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☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

We believe that due to the existing confusion associated with the Functional Model and the difficulty in defining the exact duties of the various authorities, the Version 0 Transition should move forward using existing terms that are well recognized and understood within the industry, such as Control Area, Transmission Owner, etc. In instances where the term ERRIS was used, it should be replaced using existing terms that clearly identify the parties responsible for complying with the Standard. In this way the Version 0 Translation effort may move forward without being delayed or voted down due to concerns and cofusion over the Functional Model. Once the difficulties and confusions surrounding the Functional Model have been completely identified and corrected, the Version 0 Standards may then be updated to correctly identify responsibility for complying with the appropriate Functional Model entities.

Question 3: Dynamic Scheduling Requirement

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Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

We do not feel it is necessary to remove these guides from the standards. However, another consideration would be to develop a stand alone document containing all of the valuable information that was omitted from the new Version 0 Standards and including this new document as an appendix to the Version 0 Standards. By doing this the Version 0 Standards would only include requirements that must be complied with

The "Reliability Standard Template" shown in the "NERC Reliability Standards Process Manual" states that a Reliability Standard is to have a section for "Supporting Information Elements". Although the Guides do not set forth requirements for the Standard, they do aid in helping entities more clearly understand the extent of the requirements in the Standard. To that end, the Guides basically provide notes pertaining to implementation or compliance and are appropriate for inclusion in the final Standard..

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

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- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

The following comments were received from various members of the CCMC regarding the above topic. It appears that the majority of the group support dropping these standards from Version 0.

We understand the reasons given for dropping the Phase III and IV Planning Standards from the Version 0 Translation. We agree that the translation process being used in developing Version 0 does not allow for modification to existing requirements and measures. However, we also point out that droping the Phase III and IV Planning Standards results in a change to the old requirements. Not being required to comply with certain requirements is a change. Therefore we believe that any of these Planning Standards identified as critical in any of the Version 0 comments should be addressed as a priority Ugent Action SAR.

In accordance with the basic process of Version 0 of not making changes to translated source documents, any Phase III and Phase IV Standards/Measurements that were to be dropped should be retained, but translated in the Reliability Standard format. Since all the previously submitted comments on Phase III will not be addressed and none of Phase IV has been revisited since inception, these Version 0 Standards should be balloted on and retained as "official," "non-implementable" Planning Standards. An urgent SAR would be drafted to move these Standards through the normal SAR/Standard drafting process. This will ensure that years of previous work is not intentionally delayed by clearing them from the records and forcing the process to start from scratch.

I would not put the phase III and IV standards into version 0 as "non-implementable". I don't understand what that would accomplish and it is not a recognized designation. They should be left out of version 0 and avoid the controversy that could jeopardize the ballot with a designation that is not recognized as legitimate. These phase III and IV standards should go to an urgent SAR that requires the drafting team take the previous comments and concerns into consideration.

I still suggest that III and IV be retained as "Standards" and not simply discarded and start the process from scratch (which can be a long process). This concept has been brought up in Version 0 several times. It keeps the 1997 BOT approved Standards on the table. Also the Board approved crisp Standards that were not to be implemented for months - Cyber was similar. There is nothing wrong with keeping good standards on the books and not leaving them on the cutting room floor.

As stated by the SERC Planning Standards Committee "If any Phase IV measurements are included in Version 0, they should be field-tested. Industry comments from the field test should be incorporated in the final version before full implementation. This process has worked well in the past and should be continued where appropriate." This is the same approach that I am suggesting here. Keep them, but with qualifications on field testing and implementation.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☒ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
SPS	☐ Delete ☐ Add ☒ Modify	**NERC should retain the exisiting definition, but modify the last sentence to read Remedial Action Scheme (RAS) is used in**
SPS	☐ Delete ☐ Add ☒ Modify	**(continued from above) the Western Interconnection to identify these types of systems.**
Unaffiliated Third Party	☐ Delete ☒ Add ☐ Modify	**Referenced in many of the new Standards. It should be added to the Glossary of Terms.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
We believe that it is better to make one change than two.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☒ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

See reference to delaying the use of the Functional Model until all problems are resolved. This may not be a show stopper for all involved but we feel strongly that the functional model is not ready at this time.

It should be emphasised that it should be made extremely clear as to what is expected in February when/if the Version 0 templates are official. If all of the Requirements listed in the Version 0 will then be considered mandatory, it will be difficult to determine how to measure each one, if they are measurable, and if they really make a difference to reliability. An implementation timetable for "compliance" to the version 0 standards must be produced if the requirments are all considered mandatory.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
No show stoppers.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact: R. Peter Mackin

Contact Organization: Transmission Agency of Northern California

Contact Segment: 1

Contact Telephone: 916-631-3212

Contact Email: pmackin@navigantconsulting.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Chifong Thomas	Pacific Gas and Electric Co.	WECC	1
Matthew Stoltz	Basin Electric Power Cooperative	WECC	1
John Collins	Platte River Power Authority	WECC	1
Kyle Kohne	Bonneville Power Admin. - Trans.	WECC	1
Joe Seabrook	Puget Sound Energy	WECC	1
Dilip Mahendra	Sacramento MUD	WECC	1
Tom Green	Xcel Energy	WECC	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
The initial decision regarding whether or not to use external resources for reserves is a business practice. However, once external resources are planned on for reserves, CBM is required for reliability and therefore, CBM should be addressed in the Version 0 Standards.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
TRM is needed to account for uncertainties in the modeled flows external to the system being studied. This value is needed for reliability and should be included in Version 0.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☒ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
End-user	☐ Delete ☒ Add ☐ Modify	**Standard 053 refers to end-user and end-user facilities. Having a definition of end-user in the Glossary would help clarify what these terms mean.**
Regional Reliability Organization	☐ Delete ☐ Add ☒ Modify	**A definition for this term needs to be created. We would suggest: One of the current NERC Regional Electric Reliability Councils.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☒ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
No

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

The term *Interchange Transactions* is used several times within Reliability Standard 058. The NERC Glossary defines *Interchange Transaction* as *An agreement to transfer energy from a seller to a buyer that crosses one or more Balancing Authority Area boundaries.* We don't believe that the entities which will be providing system data (power flow data) will be specifying transactions between sellers and buyers. The term *Interchange Schedule*, defined as *The planned interchange between two Adjacent Balancing Authorities resulting from the implementation of one or more Interchange Transactions*, might be more appropriate to specify as the data requirement.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.1	☒ R ☐ M Number 1.1	**Please change interchange transactions to interchange schedules. See reasoning given above in Question 12.**
58.1	☐ R ☒ M Number 1.1	**Please change interchange transactions to interchange schedules. See reasoning given above in Question 12.**
58.2	☒ R ☐ M Number 2.1	**Please change both occurrences of interchange transactions to interchange schedules in item (g). See reasoning given above in Question 12.**
58.3	☒ R ☐ M Number 3.1	**Please change both references to Reliability Standard 058.4-R4 to Reliability Standard 058.4-R4-1. We believe only R4-1 is applicable and should be the correct reference.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.3	☒ R ☐ M Number 3.2	**Please change the reference to Reliability Standard 058.4-R4 to Reliability Standard 058.4-R4-1. We believe only R4-1 is applicable and should be the correct reference.**
58.3	☐ R ☐ M Number	**Please change the reference to Reliability Standard 058.4-R4 to Reliability Standard 058.4-R4-1 in the following three locations: Compliance Monitoring Process: Timeframe:, Levels of Non-compliance: Level 1:, and Levels of Non-compliance: Level 3:. We believe only R4-1 is applicable and should be the correct reference.**
58.4	☒ R ☐ M Number 4.1	**Please change static VAR controls to Static VAR controllers**
58.4	☒ R ☐ M Number 4.2	**There appears to be extra text at the end of this requirement. Please remove the following text from the end of the sentence: on request (five business days). This requirement is already stated earlier in the same sentence.**
58.4	☐ R ☒ M Number 4.1	**Please add the following text to the end of the first sentence: and shall provide the documentation as specified in Reliability Standard 058.4-R4-2. This change will make this measure consistent with Measure M2-1 in Reliability Standard 058.2**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.6	☒ R ☐ M Number 6.1	**We believe there is a grammatical error in the second paragraph of Requirement 6-1. The last four words of this paragraph should probably be changed from: each of that Interconnection to: each Interconnection.**
51.4	☒ R ☐ M Number 4.1	**We suggest removing the statement: The controlled interruption of customer demand, the planned removal of generators, or the curtailment of firm (non-recallable reserved) power transfers maybe necessary to meet this standard R4-1. This statement did not appear in the original compliance template and may be a copy and paste addition error from Requirement R3-1**
60.0	☐ R ☐ M Number	**Methodology(s) and Methodology(ies) are both used throughout this standard. We believe that Methodology(ies) should be the preferred form to use.**
60.1	☐ R ☐ M Number	**The terms -facility-, -electrical facility-, and -transmission facility- are used interchangeably throughout the Requirements and Measurments sections. We suggest just using one term throughout the document.**
60.2	☐ R ☐ M Number	**The terms -facility-, -electrical facility-, and -transmission facility- are used interchangeably throughout the Requirements and Measurments sections. We suggest just using one term throughout the document.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
67.3	☒ R ☐ M Number 3.2	**Required -results- are unclear. Suggest changing to read -… shall provide evidence of implementation and compliance with schedules to test and maintain to the Regional …-.**
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	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
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	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact: Chifong Thomas

Contact Organization: Pacific Gas and Electric Company

Contact Segment: 1

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Contact Email: clt7@pge.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Ben Morris	PG&E	WECC	1
Jim Filippi	PG&E	WECC	1
Eric Law	PG&E	WECC	1
Kang Ling Ching	PG&E	WECC	1
Sherman Chen	PG&E	WECC	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

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☐ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

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Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

The I.D. Voltage Support and Reactive Power planning standard with the WECC additon is an significant standard for WECC. PG&E recommends that this be a priority Urgent Action SAR.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

All portions regarding ATC should be a business practice.
Only the calculation of TTC should be included in NERC Reliability Standards.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
056.1 Requirements R1-1 a, b, d and e should be a NAESB business practice.
056.2 should be a NAESB business practice.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☒ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
SPS	☐ Delete ☐ Add ☒ Modify	**For clarity, NERC should retain the existing definition. But if the new definition is kept, change "Also called Remedial Action Scheme" to a complete sentence.**
Unaffilated Third Party	☐ Delete ☒ Add ☐ Modify	**Need to define.**
End-user	☐ Delete ☒ Add ☐ Modify	**Standard 053 refers to end-user and end-user facilities. Having a definition of end-user in the Glossary would help clarify what these terms mean**
Regional Reliability Organization	☐ Delete ☒ Add ☐ Modify	**A definition for this term needs to be created. We would suggest: One of the current NERC Regional Electric Reliability Councils.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

If the numbering scheme is to be modified, it should be done only once, and be used consistently in the future standards. It is very confusing to track all the substantive changes in all the SARs and reliability standards under development. Adding more changes to the number schemes would just add to the confusion.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
No

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

The introduction in each of the original NERC Standards provided useful back ground information in applying the standards and should be retained as part of each standard. Perhaps this information could be included as a Purpose statement in each standard.

The standards could be more succint by combining the requirement to prepare and submit under one requirement instead of two. This appear throughout the standards. For example, see standard 058.1 R1-1 and R1-2.

The term "Interchange Transactions" is used several times within Reliability Standard 058. The NERC Glossary defines "Interchange Transaction" as "An agreement to transfer energy from a seller to a buyer that crosses one or more Balancing Authority Area boundaries." We don't believe that the entities which will be providing system data (power flow data) will be specifying transactions between sellers and buyers. The term "Interchange Schedule", defined as "The planned interchange between two Adjacent Balancing Authorities resulting from the implementation of one or more Interchange Transactions", might be more appropriate to specify as the data requirement.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.0	☐ R ☐ M Number	**All of the bulleted item under the 51.x standards should be located in one place.**
51.1	☒ R ☐ M Number	**The statement: Be supported by a current or past study and/or system simulation testing that . . . being assessed is confusing.** **The following is suggested as a replacement: Be supported by a current or past study that demonstrates compliance with Category A of Table 1 for the plan year being assessed.**
51	☐ R ☐ M Number	**The introduction in the original NERC Standards provided useful back ground information in applying the standard and should be retained. This comment would also apply to most of the other draft standards.**
51.2	☒ R ☐ M Number	**The statement: "Be supported by a current or past study and/or system simulation testing that . . . being assessed," is confusing.** **The following is suggested as a replacement "Be supported by a current or past study that demonstrates compliance with Category B of Table 1 for the plan year being assessed."**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.3	☒ R ☐ M Number	**The statement: "Be supported by a current or past study and/or system simulation testing that . . . being assessed," is confusing.** **The following is suggested as a replacement "Be supported by a current or past study that demonstrates compliance with Category C of Table 1 for the plan year being assessed."**
51.4	☒ R ☐ M Number	**The statement: "Be supported by a current or past study and/or system simulation testing that . . . being assessed," is confusing.** **The following is suggested as a replacement "Be supported by a current or past study that demonstrates compliance with Category D of Table 1 for the plan year being assessed."**
53.1	☒ R ☐ M Number	**If this standard is kept, R1-1 and R1-2 should be merged**
54.0	☐ R ☐ M Number	**The last sentence in the Purpose should be delete as it repeats previouly stated information.**
55.2	☒ R ☐ M Number R2-3	**Need to clarify what documents should be provided and what is expected of an entity in complying with this standard.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.0	☒ R ☐ M Number	**Define whom the Responsible Entity is for providing the data. The term Interchange Transactions should be replaced with Interchange Schedule.**
58.1	☒ R ☐ M Number 1.1	**Please change interchange transactions to interchange schedules. See reasoning given above in Question 12.**
58.1	☐ R ☒ M Number 1.1	**Please change interchange transactions to interchange schedules. See reasoning given above in Question 12**
58.2	☒ R ☐ M Number 2.1	**Please change both occurrences of interchange transactions to interchange schedules in item (g). See reasoning given above in Question 12.**
58.3	☒ R ☐ M Number 3.1	**Please change both references to Reliability Standard 058.4-R4 to Reliability Standard 058.4-R4-1. We believe only R4-1 is applicable and should be the correct reference.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.3	☒ R ☐ M Number 3.2	**Please change the reference to Reliability Standard 058.4-R4 to Reliability Standard 058.4-R4-1. We believe only R4-1 is applicable and should be the correct reference.**
58.3	☐ R ☐ M Number	**Please change the reference to Reliability Standard 058.4-R4 to Reliability Standard 058.4-R4-1 in the following three locations: Compliance Monitoring Process: Timeframe:, Levels of Non-compliance: Level 1:, and Levels of Non-compliance: Level 3:. We believe only R4-1 is applicable and should be the correct reference.**
58.4	☒ R ☐ M Number 4.1	**Please change static VAR controls to Static VAR controllers**
58.4	☒ R ☐ M Number 4.2	**There appears to be extra text at the end of this requirement. Please remove the following text from the end of the sentence: on request (five business days). This requirement is already stated earlier in the same sentence**
58.4	☐ R ☒ M Number 4.1	**Please add the following text to the end of the first sentence: and shall provide the documentation as specified in Reliability Standard 058.4-R4-2. This change will make this measure consistent with Measure M2-1 in Reliability Standard 058.2**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
69.1	☐ R ☐ M Number	**Suggest renaming title to Special Protection System REVIEW Procedure.**
69.1	☒ R ☒ M Number	**We believe that only SPS, the operation or misoperation of which would have regional impacts should have a review requirement.**
70.4	☐ R ☒ M Number 4.0	**As written it is unclear what must be reported as a blackstart unit.**
58.6	☒ R ☐ M Number 6.1	**We believe there is a grammatical error in the second paragraph of Requirement 6-1. The last four words of this paragraph should probably be changed from: each of that Interconnection to: each Interconnection.**
61.7	☒ R ☐ M Number 7.1	**R7-1 and M7-1 are not consistent with respect to whom the data should be reported to. It appears that M7-1 is correct and R7-1 is in error.**

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67.3	☒ R ☐ M Number 3.2	**Required -results- are unclear. Suggest changing to read -… shall provide evidence of implementation and compliance with schedules to test and maintain to the Regional …-.**
67.3	☐ R ☒ M Number 3.2	**Required -results- are unclear. Suggest changing to read -… shall provide evidence of implementation and compliance with schedules to test and maintain to the Regional …-.**
51.4	☒ R ☐ M Number 4.1	**We suggest removing the statement: The controlled interruption of customer demand, the planned removal of generators, or the curtailment of firm (non-recallable reserved) power transfers maybe necessary to meet this standard R4-1. This statement did not appear in the original compliance template and may be a copy and paste addition error from Requirement R3-1**
60.1	☐ R ☐ M Number	**The terms -facility-, -electrical facility-, and -transmission facility- are used interchangeably throughout the Requirements and Measurments sections. We suggest just using one term throughout the document.**
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Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Phil Park**	
Organization:	**British Columbia Transmission Corporation**	
Telephone:	**604 699 7340**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☐	1 - Transmission Owners
☐ ECAR	☒	2 - RTOs, ISOs, Regional Reliability Councils
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☒ WECC		
☐ NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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☐ Agree.

☐ Disagree.

Comments

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DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

The I.D. Voltage Support and Reactive Power planning standard with the WECC additon is an significant standard for WECC. BCTC recommends that this should be a priority Urgent Action SAR.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections.

This standard should be deleted and not be part of the reliabiltiy standards. This should be covered or is covered by NAESB and FERC.

The reliability constraint should be that the calculation of the TTC must meet all of the reliability standards. 054.1 as currently drafted does not require meeting the reliability standards.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections.

This standard should be deleted and not be part of the reliabiltiy standards. This should be covered or is covered by NAESB and FERC.

Is there a requirement to maintain CBM? If this standard is retained, it should be made clear whether or not maintaining CBM is a requirement on NERC members.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
All sections.

This standard should be deleted and not be part of the reliabiltiy standards. This should be covered by or is covered by NAESB and FERC.

Is there a requirement to maintain TRM? If this standard is retained, it should be made clear whether or not maintaining TRM is a requirement on NERC members.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
SPS	☐ Delete ☐ Add ☒ Modify	**For clarity, NERC should retain the existing definition. But if the new definition is kept, change "Also called Remedial Action Scheme" to a complete sentence.**
Unaffilated Third Party	☐ Delete ☒ Add ☐ Modify	**Need to define.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

The introduction in each of the original NERC Standards provided useful back ground information in applying the standards and should be retained as part of each standard. Perhaps this information could be included as a Purpose statement in each standard.

The standards could be more succint by combining the requirement to prepare and submit under one requirement instead of two. This appear throughout the standards. For example, see standard 058.1 R1-1 and R1-2.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.0	☐ R ☐ M Number	**All of the bulleted item under the 51.x standards should be located in on place.**
51.1	☒ R ☐ M Number	**The statement: Be supported by a current or past study and/or system simulation testing that . . . being assessed is confusing.** **The following is suggested as a replacement: Be supported by a current or past study that demonstrates compliance with Category A of Table 1 for the plan year being assessed.**
51	☐ R ☐ M Number	**The introduction in the original NERC Standards provided useful back ground information in applying the standard and should be retained. This comment would also apply to most of the other draft standards.**
51.2	☒ R ☐ M Number	**The statement: "Be supported by a current or past study and/or system simulation testing that . . . being assessed," is confusing.** **The following is suggested as a replacement "Be supported by a current or past study that demonstrates compliance with Category B of Table 1 for the plan year being assessed."**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.3	☒ R ☐ M Number	**The statement: "Be supported by a current or past study and/or system simulation testing that . . . being assessed," is confusing.** **The following is suggested as a replacement "Be supported by a current or past study that demonstrates compliance with Category C of Table 1 for the plan year being assessed."**
51.4	☒ R ☐ M Number	**The statement: "Be supported by a current or past study and/or system simulation testing that . . . being assessed," is confusing.** **The following is suggested as a replacement "Be supported by a current or past study that demonstrates compliance with Category D of Table 1 for the plan year being assessed."**
53.1	☒ R ☐ M Number	**If this standard is kept, R1-1 and R1-2 should be merged**
53.0	☒ R ☐ M Number	**This standard is not focused on interconnected transmission system reliability. Since this standard is covered by the FERC, NERC should not have this as a standard. Since this standard is not a reliability standard, RS recommends that this standard be dropped.**
53.2	☒ R ☐ M Number R2-1c	**Replace the work "cooperated" with "coordinated".**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
54.0	☐ R ☐ M Number	**The last sentence in the Purpose should be delete as it repeats previouly stated information.**
54.1	☒ R ☒ M Number	**This standard should be deleted and not be part of the reliabiltiy standards. This should be covered by NAESB and FERC.** **The reliability constraint should be that the calculation of the TTC must meet all of the reliability standards. 054.1 as it stands now does not require meeting the standards.**
54.2	☒ R ☒ M Number	**This standard should be deleted and not be part of the reliabiltiy standards. This should be covered by NAESB and FERC.** **The reliability constraint should be that the calculation of the TTC must meet all of the reliability standards. 054.2 as it stands now does not require meeting the standards.**
54.3	☒ R ☒ M Number	**This standard should be deleted and not be part of the reliabiltiy standards. This should be covered by NAESB and FERC.** **The reliability constraint should be that the calculation of the TTC must meet all of the reliability standards. 054.3 as it stands now does not require meeting the standards.**
55.2	☒ R ☐ M Number R2-3	**Need to clarify what documents should be provided and what is expected of an entity in complying with this standard.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.0	☒ R ☐ M Number	**Define whom the Responsible Entity is for providing the data. This appears to be a defined term, but it is not in the Glossary.**
58.0	☒ R ☐ M Number	**The term Interchange Transactions should be replaced with Interchange Schedule.**
63.0	☐ R ☐ M Number	**RS believes this is a standard that should not be changed. This standard has been translated very well and the confusing parts of the old standard have been resolved.**
63.0	☐ R ☒ M Number	**It does not appear that III.A.M2 was translated into the Version 0 standard.**
68.4	☒ R ☐ M Number 4.2	**The statement: shall provide documentation of the program and its implementation; should be replaced by: shall provide documentation of the maintenance and testing program and its implementation**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
69.1	☐ R ☐ M Number	**Suggest renaming title to Special Protection System REVIEW Procedure.**
69.1	☒ R ☒ M Number	**RS believes that only SPS with regional impact should have a review requirement.**
70.4	☐ R ☒ M Number 4.0	**As written it is unclear what must be reported as a blackstart unit. RS intreprets that a house unit at a hydro plant would be the blackstart unit and not each unit at the facility.**
61.0	☐ R ☐ M Number	**These requirements are not consistent with current reporting practices in the west. Entities report information to WECC and WECC reports to NERC. This standard would require the LSA, PA and RP each to report to several entities.**
61.7	☒ R ☐ M Number 7.1	**R7-1 and M7-1 are not consistent with respect to whom the data should be reported to. It appears that M7-1 is correct and R7-1 is in error.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
61.0	☒ R ☐ M Number 7.1	**Resource Planner should not be included in this requirement. RS does not see a need for this.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Robert C. Williams**	
Organization:	**Florida Municipal Power Agency**	
Telephone:	**407-355-7767**	
Email:	**bob.williams@fmpa.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☒ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☒	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*
Joseph J. Krupar	Florida Municipal Power Agency	FRCC	3

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

For a better transition from NERC Operating Policies to Standards in Version 0 it is recommened that Reliability Authority be dropped, Reliability Coordinator be included and the Control Area responsibilities be split between the Transmission Operator and the Balancing Authority. Then an evaluation of the operation of the functions in Version 0 Standards can be used in any future revision of the Functional Model.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
See comments on question 1.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

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R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Could live with either and alternative B, at best, is an interim solution. The ideal requirement would be that a tag be required for the next day estimated hourly energy of a Dynamic Interchange Schedule, but no updates would be necessary if the actual schedule signal is provided to the Reliability Coordinator overseeing the Area of the Bulk Electric System. The Reliability Coordinator overseeing the Area of the Bulk Electric System would be required to provide the actual schedule signal to the IDC. This is more information that the IDC receives from an existing Control Area about the generation dispatch that effects flowgates modeled in the IDC.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

The attachments need to be upgraded to be included in the Version 0 Standards. Glossary of Terms need to be used and other terms like Contol Area needs to be changed to BA or TOP. Also terms used in these Attachments may require additions to the Glossary like the terms RMS, CTs, PTs which are used in one Attachment.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

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- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
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Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

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054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

In fact, the Reliability Coordinators, Transmission Operators and Balancing Authorities should be the only ones that are responsible for compliance in the operations sections Version 0 Standards.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Bulk Electric System	☐ Delete ☐ Add ☐ Modify	**OK for now. But needs work to assure TOPs, BAs and RCs functions to assure reliability to the Bulk Electric System.**
Network Integration Transmission Service	☐ Delete ☐ Add ☒ Modify	**Change "tot hat" to "to that" in the definition.**
Network Integration Transmission Service	☐ Delete ☒ Add ☐ Modify	**Need to add "The highest quality service offered to customers under a filed rate schedule that anticipates no planned interruptions."**
Area	☐ Delete ☐ Add ☒ Modify	**Remove Reliability Authority in definition because the RA should not be included in Version 0.**
Reliability Authority	☒ Delete ☐ Add ☐ Modify	**Remove Reliability Authority because the RA should not be included in Version 0.**
Reliability Authority Area	☒ Delete ☐ Add ☐ Modify	**Remove Reliability Authority Area because the RA should not be included in Version 0.**
Reliability Authority Information System	☐ Delete ☐ Add ☒ Modify	**Change title to Reliability Coordinator Information System because the RC has been added to Verion 0 Standards. Also change acronym to RCIS.**
Reliability Coordinator	☐ Delete ☐ Add ☒ Modify	**Remove Reliability Authority in definition because the RA should not be included in Version 0.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments
See question 11 for comment on show stoppers.

Question 11:

Are there any "show stoppers" in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

We believe that the Reliability Authority should not be included in Version 0 Standards since the Reliability Coordinator has been added. There is only partial implementation of the Functional Model and the compliance obligations, for the operating portion of Version 0 Standards, are placed on the reliability functions. The only entities being monitored for compliance of the Operating Policies now are the Control Areas and Reliability Coordinators which should translate to Transmission Operators, Balancing Authorities and Reliability Coordinators in the operating portion of Version 0. The operating portion of Version 0 Standards can be worded properly so that the existing Control Area responsibilities are given to the Transmission Operator and Balancing Authority. The existing responsibilities for the Reliability Coordinators should be retained.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
1.0	☒ R ☒ M Number	**In R1, R2, M1 and CPS2 Data, the symbol epsilon in the text is slightly different than the symbol epsilon in the equations. Should be same symbol for epsilon in all of Draft 2.**
1.0	☒ R ☒ M Number	**In R1 the term "targeted frequency bound" was changed to "targeted frequency bandwidth". If bandwidth is the new term then bound should be changed in R2, M1, CPS1 Data and CPS2 Data.**
1.0	☐ R ☒ M Number 2	**Last sentence of M2 should be a Requirement (R5) instead of a Measurement. "A Balancing Authority providing or receiving Supplemtal Regulation Service through Dynamic Transfer shall continue to be evaluated on the characteristics of its own ACE with the supplemental Regulation Service included."**
1.0	☐ R ☐ M Number	**Regional Differences The actual ERCOT Control Performance Standard 2 Waiver approved November 21, 2002 by the OC should be shown under "Regional Differences".**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
2.0	☐ R ☒ M Number 1.0	**The term Reportable Disturbance needs to replace some words in the first sentence of M1. Recommended change " A Balancing Authority or Reserve sharing Group shall calculate and report compliance with the Disturbance Control Standard for all Reportable Disturbances.**
2.0	☐ R ☒ M Number 1.0	**In [PSRD 2.3] the second ACE in the first sentence should be eliminated. Also there are three ACE subscript "m" in [PSRD 2.3] that should be changed to subscript "M".**
4.0	☒ R ☐ M Number 3.0	**Change to "Each Balancing Authority, when requested, shall participate in a Time Error Correction by one of the following methods:** **R3.1 [Policy 1D 3.1] The Balancing Authority shall offset its frequency schedule by 0.02 Hertz, leaving the Frequency Bias Setting normal; or** **R3.2 [Policy 1D 3.2] The Balancing Authority shall offset its Net Interchange Schedule (MW) by an amount equal……."**
6.0	☒ R ☐ M Number	**Regional Differences The actual MISO RTO Inadvertent Interchange Accounting Waiver approved by the Operating Committee on March 25, 2002 should be shown under "Regional Differences".**
7.0	☒ R ☐ M Number	**The "Reliaibility Authorities" and "Reliability Authority" should be changed to "Reliability Coordinators" and "Reliabilty Coordinator" in "Applicability" and R1-6**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
7.0	☒ R ☐ M Number 2.0	**Need to include "Balancing Authority" because of the impact on stability of generation serving load.**
008	☒ R ☐ M Number	**Remove "Reliability Athority" from Standard 008.**
009	☒ R ☐ M Number	**The sentence "Violations are also reported to the compliance program." is unnecessary in the Purpose.**
9.0	☒ R ☐ M Number	**Remove "Reliability Authority" from Standard 009.**
9.0	☒ R ☐ M Number 5.1	**Remove "by the Transmission Operator"**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
9.0	☒ R ☐ M Number 9.0	**Recommend that "Reliability Authority shall direct" be replaced with "Reliability Coordinator and Transmission Operator shall direct or implement".**
10.0	☒ R ☐ M Number	**The "Reliability Authority" should be removed from the Purpose.**
10.0	☐ R ☐ M Number	**Regional Differences The actual WECC Tagging Dynamic Schedules and Indaverent Payback Waver approved by the OC and effective on November 21, 2002 should be shown under "Regional Differences".**
10.0	☒ R ☐ M Number	**Regional Differences The actual MISO Energy Flow Information Waiver approved by the OC and effective July 16, 2003 should be shown under "Regional Differences".**
11.0	☒ R ☐ M Number 1.0	**Remove "Reliability Authority(ies),"**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
13.0	☒ R ☐ M Number	**Remove "Reliability Authorities" from Applicability and "Reliability Authority" from R1, R4 and R5.3**
13.0	☒ R ☐ M Number	**Regional Differences The actual WECC Tagging Dynamic Schedules and Indaverent Payback Waver approved by the OC and effective on November 21, 2002 should be shown under "Regional Differences".**
14.0	☒ R ☐ M Number	**The "Reliability Authorities" & "Reliability Authority" needs to be removed from Standard 014.** **Requirement R1.1 should be rewritten to require the BA to receive information from the Generator Operator.** **The second R1.2 should be removed if RA is removed from Standard 014.**
15.0	☒ R ☐ M Number	**In the Applicability section the "Reliability Authority" should be removed.** **In R1 and R1.1 all "Reliability Authority" should be changed to "Reliability Coordinator".** **In R2 and R5 remove "Reliability Authority" and "Reliability Authorities".** **In M1 remove "Reliability Authority".**
15.0	☒ R ☐ M Number	**In non-complaince level 1 and level 4 "responsible entity" should be changed to "Transmission Operator and Balancing Authority" and "requesting entity" should be changed to "Reliability Coordinator".** **In Attachment 015-1 "Reliability Authorities" should be changed to "Reliability Coordinators".**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
16.0	☒ R ☐ M Number	**In Purpose and Applicability "Reliability Authorities" should be replaced with "Reliability Coordinators".** **In R1.1 the Transmission Operator should obtain the outage data from the Generator Operator and provide the outage data to the Reilability Coordinator.** **In R1.2, R2, R3, R4, M1, Compliance Monitoring and Levels of Non Compliance the "Reliability Authority" should be replaced with the "Reliability Coordinator".**
17.0	☒ R ☐ M Number	**In R1 and R2.2 the "Reliability Authority" should be removed.** **In Applicability, R3.2, R4, R5.2 and R6 the "Reliability Authority" should be changed to "Reliability Coordinator".**
18.0	☒ R ☐ M Number	**In Purpose change "normal conditions during and emergency" to "to normal coditions during and after an emergency".** **In Applicability, R1 and R2 the "Reliability Authority" should be replaced with "Reliability Coordinator".** **In R3, R4 and R5 the "Reliability Authority" should be removed.** **In R6 and R7 "Reliability Authority" should be replaced with "Reliability Coordinator".** **The second R7 should be R8.**
19>28	☒ R ☐ M Number	**The "Reliability Authorities" and "Reliability Authority" should be removed from Standard 019, 020, 021, 022, 023, 024, 025, 026, 027 and 028.** **In Attachment 020-1 A 1 the "Reliability Authority's" should be changed to "Reliability Coordinator's".** **In Attachments 022-1 and 022-2 The "Reliability Authorities" and "Reliability Authority" should be removed. Also in Attachment 027-4 "reliability coordinators" replace "Reliability Coordinators".**
29>30	☒ R ☐ M Number	**The "Reliability Authorities" and "Reliability Authority" should be replaced with "Reliability Coordinators" and "Reliability Coordinator" in Standard 029 and 030.** **In 030 M1 add " have the " between the words "personnel" and "responsibility". Also in 030 M1 d) change "are" to "can be" or "shall be".**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
31.0	☒ R ☐ M Number	**The "Reliability Authority" should be replaced with "Reliability Coordinator".** **In Self-Certification of Compliance Monitoring Process change "requirement 1 and 2" to "R1" because there is only one requirement of Standard 31.** **In Level 2 of Levels of Non Compliance change "Requirement 1" to "R1.1". Also in Level 3 change "Criterion 2 of Requirement 1" to "R1.2".**
31.0	☒ R ☐ M Number	**Attachment 031-1 has:** **The word control area 41 times. Should be changed to Balancing Authority and/or Transmission Operator as appropriate.** **Terms used in the Glossary of Terms like dynamic schedules that are not shown as defined terms like Dyanmic Schedules. Need to go though the attachment to correct.** **There are incorrect terms like "Regional Council" which in the glossary is Regional Reliability Organization (Region).**
32.0	☒ R ☐ M Number	**The "Reliaibility Authorities" and "Reliability Authority" should be changed to "Reliability Coordinators" and "Reliabilty Coordinator" in Standard 032.** **Remove the words "either one or" from R1 to be consistent with existing Policy.** **In the Compliance Monitoring Process the term "Operating Authority" should be changed to "Reliability Coordinator, Transmission Operator or Balancing Authority".**
33.0	☒ R ☐ M Number	**The Reliability Authority should be removed from Standard 033.** **In Compliance Monitoring Process the words "operating entities" are used twice and should be replaced with "Transmission Operator and Balancing Authority".**
34.0	☒ R ☐ M Number 234.0	**Remove "Reliability Authorities".**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
36.0	☒ R ☐ M Number 3.0	**Remove "Reliability Authorities".**
37.0	☒ R ☐ M Number	**In R4, R7 and R8 Remove "Reliability Authorities".** **In R7 change "(RAIS)" to "(RCIS)".**
38.0	☒ R ☐ M Number	**The "Reliability Authorities" and "Reliability Authority" should be removed from Standard 038.**
039	☒ R ☐ M Number	**The "Reliability Authorities" should be removed from Standard 039.** **Attachment 039-1:** **In 1.3 and 2.8.2 change "bulk system" to "Bulk Electric System".** **In Figure 1 of 6.2 the current hour and next hour are missing.** **In Figure 2 of 6.2 "Sink Control Area" should be changed to "Sink Balancing Authority".** **In 7.9 "Control Area" should be changed to "Balancing Authority".**
40.0	☒ R ☐ M Number	**The "Reliability Authority" in R1, R3 and R4 should be changed to "Transmission Operator and Balancing Authority". The "Reliability Authority" should be removed from R5.**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Robert Williams**	
Organization:	**PacifiCorp**	
Telephone:	**(503) 251-5197**	
Email:	**robert_l.williams@pacificorp.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT	☐	1 - Transmission Owners
☐ ECAR	☐	2 - RTOs, ISOs, Regional Reliability Councils
☐ FRCC	☐	3 - Load-serving Entities
☐ MAAC	☒	4 - Transmission-dependent Utilities
☐ MAIN	☐	5 - Electric Generators
☐ MAPP	☐	6 - Electricity Brokers, Aggregators, and Marketers
☐ NPCC	☐	7 - Large Electricity End Users
☐ SERC	☐	8 - Small Electricity End Users
☐ SPP	☐	9 - Federal, State, Provincial Regulatory or other Government Entities
☒ WECC		
☐ NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
No

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

It would be much easier to follow changes to Version 0, the functional model and the certification standards, if they were more aligned. It seems that they are all going in a different direction. This is happening at too fast of a pace. Those of us who are on the operational end of things will tend to be left out of the process, because we are busy with keeping up with all of the new FERC and NERC mandates on training and certification. After the finished product comes out, we are obligated to implement policies and standards that are sometimes difficult to apply to our regions.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
31.0	☐ R ☐ M Number	**APPLICABILITY – the Reliability Coordinator is not listed. The RC must be part of the Functional Model, as Standard 36 properly recognizes by referring to the RC. Standard 31 should include the RCs under "Applicability" otherwise there is no requirement for RCs to have a formal training program. Standard 36 simply refers to RCs being "adequately trained."**
31.0	☒ R ☐ M Number 1	**R1 indicates the Standard applies to the RA, TO and BA that are involved EITHER with a) or b) which is consistent with the draft of Standard 32 dealing with operator certification requirements. While OTS does not support the language used in Standard 32 for certification, we support the concept that a training program should be required of all entities with system operators that perform either a) or b).**
31.0	☒ R ☐ M Number 1.2	**The Reset Period of this Standard is "One-calendar year." R1.2 should be modified from "five days per year" to "five days per calendar year" to be more specific.**
31.0	☒ R ☐ M Number 1.2	**R1.2 modifies the Recommendation 6 approved by the NERC Board of Trustees on February 10, 2004. Greater clarity of the recommendation has been needed since it was approved and Version 0 should be the vehicle to accomplish this. It is noted the Recommendation 6 sentence, "This system emergency training is in addition to other training requirements" has been omitted, and I support this change.**

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

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Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **Operating Reliability Working Group**

Lead Contact: Scott Moore

Contact Organization: Southwest Power Pool

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Additional Member Name	Additional Member Organization	Region*	Segment*
Dan Boezio	AEP	SPP	1
Bob Cochran	SPS	SPP	1
Steve Hillman	WPEK	SPP	1
Pete Kuebeck	OG&E	SPP	1
John Mason	MPS	SPP	1
Steve Massey	Westar	SPP	5
Robert Rhodes	SPP	SPP	2
Bob Cochran	SPS	SPP	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☒ Disagree.

Comments

The original intent of the Version 0 Reliability Standards was to be a mapping of existing Operating Policies and Planning Standards using the reliability standard format and functional responsibilities as contained in the NERC Functional Model. There is no Reliability Coordinator role in the Functional Model. Rather, today's Reliability Coordinators are entities not functions, many of whom could and should perform the function of Reliability Authority. To maintain the original intent, the Reliability Coordinator should not be included in the Version 0 standards. To do otherwise seemingly defeats the purpose of the Verison 0 standards and introduces unnecessary confusion. The proposed language is very confusing regarding exactly which role would be responsible for a given task. For example, additional language would be needed to clarify what is meant when the Reliability Coordinator is required to direct or coordinate a specific task with the Reliability Authority. Is the Reliability Authority referenced in this example a control area acting in the Reliability Authority role or another Reliability Coordinator? It would appear that a heirarchy of Reliability Authority roles would need to be defined and incorporated into the Verison 0 standards in order to accomplish what has been proposed. This would become an administrative nightmare. A lot of work was done to "crispen" NERC Operating Policies 5, 6, and 9 that does not need to be undone by introducing uncertainty and confusion in Version 0 standards. Just because a few Reliablity Coordinators believe they cannot perform everything expected of a Reliability Authority per the functional model is not sufficient reason to subvert the Version 0 standards as proposed. NERC should not develop standards to the least common denominator.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Given there was general satisfaction with the identification of the Reliablity Authority and the Transmission Operator in the first draft, why introduce this issue by atempting to incorporate the Reliability Coordinator role into the Version 0 standards?

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Since the Version 0 drafting team promised the industry that changes to policy in this transition would be non-existent, or minimal at most, we should not be making unnecessary, although needed, changes to policy.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

Instead of including the guides as attachments in the standards, which may effectively be interpreted as eleviating them to the status of standards, perhaps they could be incorporated into a separate document of guides and references that would be useful for interpretation of the standards.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Balancing Authority	☐ Delete ☒ Add ☐ Modify	**Add the commonly used acronym, BA, for Balancing Authority.**
Congestion Management Report	☐ Delete ☐ Add ☒ Modify	**Modify this definition to read "… identifies the transactions to be curtailed and the native and network load responsibilities associated with the loading …".**
Constrained Facility	☐ Delete ☐ Add ☒ Modify	**Replace OSL with SOL/IROL terminology.**
Distrubance Control Standard	☐ Delete ☒ Add ☐ Modify	**Add the acronym, DCS.**
GLDF	☐ Delete ☐ Add ☒ Modify	**Modify to read "… to determine the total impact of a generator serving load on an identified…".**
GSF	☐ Delete ☐ Add ☒ Modify	**A factor representing the change in flow on an identified transmission facility for a unit change in generation on a given generator and an equal but opposite**
GSF	☐ Delete ☐ Add ☒ Modify	**unit change in generation on the reference generator for the model.**
Interchange Authority	☐ Delete ☒ Add ☐ Modify	**Add the definition for Interchange Authority to the Glossary.**
Load Shift Factor	☐ Delete ☐ Add ☒ Modify	**A factor representing the change in flow on an identified transmission facility for a unit change in load for a given area and an equal unit change in**
Load Shift Factor	☐ Delete ☐ Add ☒ Modify	**generation on the reference generator for the model.**

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

We're not very impressed with either methodology. It looks like the acronyms chosen for the new numbering scheme don't really match the subject matter of the standards. For example, why was IRO used in lieu of REL? REL seems to be a better fit. Any system would probably do, it will just take time to learn the new system and become familiar with it.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments
See our response to Questions 1 and 2.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
Yes, see our response to Questions 1 and 2.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

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Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
9.0	☒ R ☐ M Number 6.0	**The 30-minute action time does not apply to SOL violations unless those violations have become IROL violations. The reference to SOL violations should be deleted.**
9.0	☒ R ☐ M Number 3.0	**Purchase-Selling Entity typo**
10.0	☒ R ☐ M Number 2.0	**Purchase-Selling Entity is used with two different spellings in Requirements R2a, R3, R4 and R5. Usage should match the glossary and be consistent throughout the standards.**
11.0	☒ R ☐ M Number 1.0	**Remove the phrase "on the Scheduling Path" from the introductory comment and add it at the end of a), b), and c). Delete e).**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
12.0	☐ R ☐ M Number	**Add the SPP Scheduling Agent Waiver that currently exists in policy.**
15.0	☒ R ☐ M Number 2.0	**Replace "with" in the third line with "within".**
18.0	☐ R ☐ M Number	**Replace "and" with "an" in the last line.**
20.0	☐ R ☐ M Number	**In Section B, Introduction of Attachment 020-1, reference is made to the NERC Operating Policies. This needs to be changed to NERC Reliability Standards.**
20.0	☐ R ☐ M Number	**In Attachment 020-1 of Standard 020, change "NERC web-site" to RCIS in Sections 2.1, 2.2, 3.1 and 3.2.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
20.0	☐ R ☐ M Number	**In Sections 2.4, 2.4.4, 3.4, 3.4.2, 3.5 and 3.5.1 of Attachment 020-1 of Standard 020, replace OSL with SOL/IROL terminology.**
24.0	☒ R ☐ M Number 17.0	**Capitalize Transmission Operator in the second line.**
26.0	☒ R ☐ M Number 7	**Should read "The Reliability Authority, Transmission Operator,…**
29.0	☐ R ☐ M Number	**In the 4th bullet on page 029-3 of Attachment 029-1, RAIS should be RCIS.**
33.0	☐ R ☐ M Number	**Delete second "that" in the last line of the Purpose.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
37.0	☒ R ☐ M Number 7.0	**The acronym RAIS should be RCIS.**
39.0	☐ R ☐ M Number	**The usage of the TLR Log as contained in Section 1.8 of Attachment 039-1 is not consistent with TLR Log definition in the Glossary. Although Section 1.8 is consistent with current Policy, this log is no longer used in actual practice. Actual practice is more in line with that captured in the definition in the Glossary.**
39.0	☐ R ☐ M Number	**Appendix C of Attachment 039-1 is no longer used. See inconsistency mentioned above.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	

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Draft 2 of Proposed Version 0 Reliability Standards

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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Robert W Waldele, Gregory A Campoli**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

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☒ Agree.

☐ Disagree.

Comments

The Reliability Authority is, in concept, a new function that does not equate one for one with Reliability Coordinator. A Transmission Operator currently performs certain defined Reliability Authority functions for (underlying and non-BES) transmission that the Reliability Coordinator may not have visibility. The Reliability Coordinator does peform the Reliability Authority functions for the EHV/BES transmission facilities within its footprint but the Transmission Operator also has Reliability Authority responsibilites for lower voltage (and non-BES) transmission as well.

The Version 0 Draft 2 Reliabilty Standards should only designate ONE functional entity as being the highest level of authority, responsible for the Reliability of the BES. NYISO strongly suggests the designation used should be the Reliability Coordinator to reflect a direct translation of recently updated Policy 9.

Other sub-entities within a contiguous RC Area may have reliability roles that are specific to a local Area and should be coordinated with the RC. The Reliability designation in their title adds confusion during this transitional phase to the Functional Model.

NYISO strongly recommends the existing Reliability Coordinators, as designated by the Regions in their respective Reliability Plans, should be the only entities allowed to register as the Version Zero reliability entity, RC. This is consistent with the RCWG/ORS Motion.

NYISO would also like to remind the drafting team that the NERC BOT has stated that the Version 0 Standards must be FULLY implementable along with the associated industry full compliance in February 2005. Full implementation of the Functional Model and designating two entities as potentially having the highest level of authority, as indicated in the posted Glossary, will not only lead to confusion but also not implementable with clearly defined responsibilities.

NYISO also notes that the Version 0 standards effort should provide valuable input to the review and update of the Functional Model and its ultimate implementation and urges NERC to give this a high priority. The comments submitted to the existing Version 2 BOT approved Functional Model should be evaluated immediately, revisions made, and the Functional Model Version 3 drafted for approval. This, along with the Version 0 Standards, should be NERC's highest priority as all the Version 1 Standards will use the Functional Model designations.

NYISO believes that this response is consistent with, and fully supports the more detailed position paper presented by The IMO on the RC/RA issue. In addition, this is also consistent with the motion passed by the ORS/RCWG.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

See response to Question #1. The Reliability Authority functions are performed by BOTH the transmission operator (for underlying and non-BES) transmission facilities that may not be visibile to the Reliability Coordinator. The choices are not consistent with the stated question as it is neither appropriate to assign ALL responsibility to the TO, nor is it appropriate to RETAIN the Reliability Authority -- the first choice should have stated Retain both Transmission Operator and Reliability Coordinator as shown. . . .

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

The stated purpose of the Version 0 Standards process is to translate the existing Operating Policies and Planning Standards, not REVISE existing policy/standards.

Alternative B is the preferred approach and its application shall result in positive impacts on reliability, however NYISO believes that this may be beyond the scope of the charge to the drafting team as it results in more than a translation of the existing standard. NYISO further recommends that if this presents an impediment to the approval of the Version 0 Standards then Alternative A would be acceptable. This would allow the work done to date by the Interchange Subcommittee, to be developed into the Version 1 SAR/Standard

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

NYISO believes this is beyond the scope of the Version 0 Standards charge. As stated above (in response to Question #3), the stated purpose is to translate exisitng policy/standard, not revise or create new requirements in the process. Including these Guides in the standard could elevate their content to a de facto standard without having been subjected to the same critical review process that the original Policy/Standard received. A Guide that provides useful information could certainly stand on its own as a reference document and be useful in the Version 1 Standards development process.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

NYISO supports the decision of the Version 0 Drafting team to remove these from the Version 0 Draft 2 package, as the compliance templates for these standards have not been fully field tested through the pilot program. Comments submitted were not addressed nor is there a schedule to do so. These standards should now be subject to the full "ANSI approved" NERC Reliability Standards Development Process.

NYISO also recommends that those Phase III and IV Standards (and associated compliance templates) that are related to Blackout Recommendation should be developed by NERC in an expeditious manner under the process and be completed in 6 months.

NYISO is concerned that by including these data and testing requirements (that are clearly useful and necessary for maintaining reliability) could result in the application of compliance templates for these measures that have not been field tested. A possible compromise would be to retain these items in a reference document(s) for use when the new formal standard(s) are developed.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

The NYISO believes all the references to ATC in this standard should be removed and referred to NAESB with the assurance that the business rules will not compromise reliability.

The Standard's requirements as it pertains to TTC should be retained in Version 0. TTC is a reliability issue and is a value that insures the system is operated in a safe and reliable manner. TTC Standards should be retained to ensure everyone follows a minimum requirement. .

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
NYISO believes that CBM is not strictly a commercial issue. Clearly there are aspects of CBM that are commercial or eceonomic in nature, where the CBM relates to the assumptions used in the resource adequacy (reliability) assessment (whether long-range, day-ahead, or in day) it should be addressed in these Standards. Additional work is required to understand fully the use of CBM across the Regions; to the extent that CBM is commercial (and not clearly relibability) it should be referred to the NAESB process.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
NYISO believes that the TRM is a reliability issue and is used, in addition to resource adequacy assessment, in the determination of secure operating limits (for day-ahead and real-time), and, therefore, is not a commercial issue. The TRM should be retained in these Standards.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments

It is not clear how a distribution provider's Facility Ratings could impact the BES reliability. Where a distribution provider's facility ratings could impact reliability of service to load, that clearly is the jurisdiction of the state and local regulatory agencies; however, there is no mention of Distribution Provider in Standard 060 (Facility Ratings).

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
RA	☒ Delete ☐ Add ☐ Modify	**NYISO believes that only RC should appear in these Version 0 standards**
BES	☐ Delete ☐ Add ☒ Modify	**The definition of BES as posted in the Glossary is too broad-based and all encompassing. See the NYISO recommendation in response to Question 11-**
RC	☐ Delete ☐ Add ☒ Modify	**Definition of the RC should be identical to the definition in existing Policy 9.**
RA Area	☐ Delete ☐ Add ☒ Modify	**This term should be modified to reflect the RC Area**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

NYISO believes that it is not appropriate to apply a new numbering scheme at this point in the process. There already is enough confusion created by trying to adapt the existing Policy/Standards to the functional model. There are standards that may not clearly apply to one (and only one) authority. It is not clear that this is within the scope of the Version 0 drafting process. If appropriate, there would be opportunity to group and renumber the standards after approval by the BOT.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

NYISO would vote NOT to approve the Version 0 Draft 2 Standards. See comments in response to Question 11 below.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Ranked in order of importance;

1) RC-RA Issue and Functional Model- NYISO strongly believe there should be only one highest level of authority and strongly recommends the Version 0 drafting team adopt the accurate translation of only the RC and its mapping into the Version 0 Standards. Introduction of the RA along with the RC adds confusion. For the purposes of Registration, NYISO agrees with the NERC RCWG and ORS that only existing RCs as designated by their respective Regional Reliability Plans should register as the highest level of authority. For more specifics please refer to our comments outlined in Question 1 above.

2) Bulk Electric System definition as listed in the posted Glossary is too broad for consideration and potentially could include everything regardless of how critical it may be to preventing a cascading blackout. NYISO believes that stakeholders/market participants need a "bright line" BES definition, but proposed definition is too broad and risks including too much lower voltage (non-EHV) facilities that are not critical to inter-Area (-Regional) reliability. The current language in the Planning Standards should be retained until a performance-based definition can be developed through the Standards Development Process. By promoting lower voltage facilities to BES status could subject those facilities to compliance requirements that were not originally design requirements and may not be necessary. Due to the individual character of each of the Regions, it is recommended that each Region define those facilities that are to be included as its bulk electric systems or interconnected transmission systems for which application of the Planning Standards will be required. NYISO would support the posted Version 0 BES definition only if it is prefaced by a statement that the Regions may reserve the right to define what constitues their BES.

3) The NYISO agrees with the Version 0 drafting team's decision to remove the non-blackout related Phase III and Phase IV Planning Standards from the Version 0 Standards. If they are reintroduced (without field-tested compliance templates), the NYISO will not be able to recommend support for the Version 0 Standards. The Phase III and IV Blackout related standards can be developed by NERC in an expeditious manner within the process within a 6 month time period where proven necessary to ensuring the reliability of the BES. The remaining Phase III and IV Standards should go through the defined Reliability Standards Process in a normal timeframe.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

In many standards, the Compliance Monitoring Responsibility/role has been assigned to Compliance Monitor referred as Unaffiliated Third Party. This role needs to be clarified and terminology be defined in the Version 0 glossary.

Version 0 Translations need additional work to address the initial requirement of ensuring that they are clear, well defined and measurable. Significant comments would need to be incorporated to meet this criteria. see our specific comments in other questions. We believe that the deletion of the "S" statements in the Planning Standards translation has resulted, in a few cases, the weakening of the Standard. NYISO recommends reinstating the language in the Purpose Statement.

There is a lack of a clear and consistent compliance process. Many of the standards the associated Measures, Compliance Monitoring Process and Levels of Non Compliance are missing or not specified. For the purposes of effective implementation/enforcement of these standards, we recommended that the associated measures, compliance monitoring process and levels of non compliance should also be (a) simultaneously mapped/specified where these exist already and (b) specifed/addressed in the very near future, where these do not exist today for consistency.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **MAPP PSDWG**

Lead Contact: Thomas Mielnik, Chair of MAPP PSDWG

Contact Organization: MAPP

Contact Segment: 2

Contact Telephone: 563-333-8129

Contact Email: tcmielnik@midamerican.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Delyn Helms	GRE	MAPP	2
Thomas Mielnik	MEC	MAPP	2
Dean Schiro	XEL	MAPP	2
Steve Sanders	WAPA	MAPP	2
Jason Weiers	OTP	MAPP	2

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1-4)

B – Planning Standard (Questions 5 -

C – General Issues Applying to Operating and Planning (Questions

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments
The MAPP PSDWG agrees with this new approach. We think it is less confusing and will result in appropriate handling of the Version 0 standards while the industry is in transition.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

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☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

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Comments
Refer to comments in MAPP Part 2 comments on Draft 2 of Version 0

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☐ Alternative A – translate existing policy and correct any deficiency in a future version.

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Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

The MAPP PSDWG supports including guides as an attachment providing the NERC member only needs to consider following the provisions in the attachment. The MAPP PSDWG does not support including guides as absolute requirements.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

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- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

The MAPP PSDWG fully supports the Working Group's new approach with regard to the Phase III and Phase IV for nearly all of the Planning Standards. It will result in enforceable standards that make sense without causing unnecessary hardships or confusion. After further review the MAPP PSDWG supports adding 57.2 back to Version 0. Given the August 14, 2003 Northeast Blackout, we believe that a requirement for Transmission Owners and Generator Owners to install Disturbance Monitoring Equipment in accordance with the RRO plan is important.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

The MAPP PSDWG believes that the entire Standard 054 should continue to be included in Version 0, because the entire standard is needed for Reliability reasons. However, the PSDWG recognizes that this standard has business aspects associated with it.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
The MAPP PSDWG believes that Standard 055.3 is a business practice that is concerned with equity with regard to the use of CBM. It indicates that CBM is only to be used after non-firm is exhausted, that it can only be used for those experiencing generation deficiency, and requires discription of when CBM can be offered for non-firm transmission service. Therefore, we believe that Standard 55.3 primarily deals with business issues and should be provided to the Joint Committee for review and resolution.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
The MAPP PSDWG believes that portions of Standard 056.1 are business practices.
In c. under R1-1, the standard says, The following components of uncertainty, if applied, shall be accounted solely in Transmission Reliability Margin and not Capacity Benefit Margin. We believe that specifying what uncertainty shall be accounted solely in TRM and not CBM is an equity issue that is more suitable for a business practice. The reasons for these words is to differentiate between things that might be thought of as being for the benefit of all market participants, TRM, and things that might be thought of as being for the benefit of generation reserve sharing pool members, CBM. The PSDWG asks that, the word, solely, and the words, and not in CBM, be deleted from the standard. Also, there is a statement that, Any additional components of uncertainty shall benefit the interconnected transmission systems, as a whole, before they shall be permitted to be included

in the Transmission Reliability Margin calculations. Again, this statement is clearly an equity issue not a reliability one. PSDWG recommends that the statement, solely in TRM and not CBM, and the statement, Any additional components of uncertain shall benefit the interconnected transmission systems, as a whole, before they shall be…., be deleted from the standard. If not, then delete R1-1c. in its entirety and submit to the JIC for consideration as a business practice. R1-1d. requires description of the conditions under which TRM is available to the market as non-firm Transmission service. We believe R1-1d. also is a business practice. Therefore, MidAmerican Energy recommends that R1-1d of 56.1 be deleted and provided to the JIC for consideration as a business practice.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☒ Yes.

☐ No.

Comments

The MAPP PSDWG believes that Distribution Provider was NOT added to the list of entities to comply. (The Standard Drafting Team apparently intended to do so.) The MAPP PSDWG believes that in certain cases, the Distribution Provider must comply with the standard. So the MAPP PSDWG supports adding the Distribution Provider as long as it is clear that it is with regard to facilities that have regional impact such as facilities that are a part of a flowgate and NOT for all distribution facilities owned by the Distribution Provider. The MAPP PSDWG recommends that when the Distribution Provider is added, a clear statement be added that facilities below 100 kV are generally not to be covered by the standard.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
ATC, TTC, CBM and TRM	☐ Delete ☒ Add ☐ Modify	**Terms frequently used or any key term integral to a standard should be defined.**
Availability	☐ Delete ☒ Add ☐ Modify	**Terms frequently used or any key term integral to a standard should be defined.**
Blackstart Capability	☐ Delete ☒ Add ☐ Modify	**Terms frequently used or any key term integral to a standard should be defined.**
Capacity	☐ Delete ☒ Add ☐ Modify	**Terms frequently used or any key term integral to a standard should be defined.**
Curtailment	☐ Delete ☒ Add ☐ Modify	**Terms frequently used or any key term integral to a standard should be defined.**
Demand	☐ Delete ☒ Add ☐ Modify	**Terms frequently used or any key term integral to a standard should be defined.**
Disturbance	☐ Delete ☒ Add ☐ Modify	**Terms frequently used or any key term integral to a standard should be defined.**
Emergency	☐ Delete ☒ Add ☐ Modify	**Terms frequently used or any key term integral to a standard should be defined.**
Fault	☐ Delete ☒ Add ☐ Modify	**Terms frequently used or any key term integral to a standard should be defined.**
Forecast	☐ Delete ☒ Add ☐ Modify	**Terms frequently used or any key term integral to a standard should be defined.**

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

The MAPP PSDWG agrees that a numbering scheme that provides information on the general category of standard is preferred to a number which has no bearing as to the content of the standards. We encourage the Standards Drafting Team to review the proposed new numbering scheme to make sure that it is flexible for the changes that may occur in the next few years in the industry.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

The MAPP PSDWG does not see any show stoppers in Draft 2 Version 0. We are especially supportive of the deletion of Standard 59 which we considered our show stopper in Draft 1 Version 0.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.0	☒ R ☐ M Number	**All four requirements in Standard 051 should use consistent language. R1-1 says that the assessment is to assure that: the network CAN DELIVER GENERATOR UNIT OUTPUT TO MEET project customer demand…. The commenter has capitalized the words that should be made consistent among the Requirements in 051. While R2-1, R3-1, and R4-1 say that: the network CAN BE OPERATED TO SUPPLY PROJECT CUSTOMER DEMANDS AND PROJECTED FIRM (NON-**
51.0	☒ R ☐ M Number	**RECALLABLE RESER VED) TRANSMISSION SERVICES….. The MAPP PSDWG asks that the requirements be changed to be consistent.**
51.0	☒ R ☐ M Number	**In c. under all four requirements it is not clear if the RRO accepts which item on the bulleted lists is to be followed in the region or the RRO accepts how the testing is done to meet the items in the bulleted list. The MAPP PSDWG recommends that it be the former and therefore delete the words, all of, that appear earlier in c. so that the requirement reads: Be supported by …. testing that addresses the elements in the following list, as accepted by the Regional Reliability Organization…..**
51.1	☐ R ☒ M Number 2.1	**Delete the extra: None identified. that is included as part of M1-2.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.2	☒ R ☐ M Number 2.1	**Delete the bullet include the planning (including maintenance) outage of any bulk electric equipment…. This is confusing. Is this asking for an exhaustive study of planned outages plus all Category B? Or is it just supposed to be add any planned outages that are known at the time the study is conducted? Or something else?**
51.3	☒ R ☐ M Number	**Correct the typo. Replace in the last line: maybe with: may be.**
51.3	☒ R ☐ M Number	**Delete the bullet include the planning (including maintenance) outage of any bulk electric equipment…. This is confusing. Is this asking for an exhaustive study of planned outages plus all Category B? Or is it just supposed to be add any planned outages that are known at the time the study is conducted? Or something else?**
51.3	☐ R ☐ M Number	**Add Each Compliance Monitor shall report compliance and violations to NERC via the NERC Compliance Reporting Process. to the Compliance Monitoring Responsibility section.**
51.4	☒ R ☐ M Number	**In the last line, replace: maybe with: may be.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.4	☒ R ☐ M Number	**Delete the bullet include the planning (including maintenance) outage of any bulk electric equipment…. This is confusing. Is this asking for an exhaustive study of planned outages plus all Category B? Or is it just supposed to be add any planned outages that are known at the time the study is conducted? Or something else?**
53.1	☒ R ☐ M Number 1.3	**In R1-3 and in the Timeframe for the Compliance Monitoring Process, 5 business days is not long enough. If a key individual is unavailable, the standard may be violated. MAPP PSDWG recommends that the 30 calendar days from 53.2 be used through out the standard.**
53.2	☒ R ☐ M Number 2.2	**In R2-2, replace: Regional Reliability Council Organizations with: Regional Reliability Organizations.**
54.1	☒ R ☐ M Number 1.1	**For R1-1f. replace: Indication that treatment and level of customer demands, including interruptible demands. With: A narrative explaining how the level of customer demands, including interruptible demands, is considered.**
55.1	☒ R ☐ M Number 1.1	**In R1-1a. replace: Regional Organization With: Regional Reliability Organization.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
56.0	☐ R ☐ M Number	**Make the Levels of Non-compliance consistent.**
56.2	☒ R ☐ M Number 2.3	**For R2-3 replace: implementation** **With: review.**
57.2	☐ R ☐ M Number	**The MAPP PSDWG supports adding 57.2 back to Version 0. Given the August 14, 2003 Northeast Blackout, we believe that a requirement for Transmission Owners and Generator Owners to install Disturbance Monitoring Equipment in accordance with the RRO plan is important.**
58.0	☐ R ☐ M Number	**Make the Levels of Non-compliance consistent.**
58.1	☐ R ☒ M Number	**Delete parentheses around (Standard 058.1-R1-1 and 058.1-R1-2).**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
58.1	☐ R ☐ M Number	**Under Timeframe change 058.2-R1-M1 to 058.2-R1-1.**
58.2	☒ R ☐ M Number	**In R2-2, five business days is not long enough. If a key individual is unavailable, the standard may be violated.**
58.4	☒ R ☐ M Number	**In R4-2, five business days is not long enough. If a key individual is unavailable, the standard may be violated.**
58.6	☐ R ☒ M Number	**In M6-1, also refer to 058.6-R6-2.**
60.1	☒ R ☐ M Number 1.2	**R1-2 refers to transmission facility and equipment ratings when R1-1 (a) spells out these elements. Recommend changing the phrase in R1-2 to say …used to determine its facility and equipment ratings as specified in 060-R1-1. to the Regional Reliability Organization(s)…**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
61.0	☐ R ☐ M Number	**Levels of non-compliance should be made consistent.**
63.1	☐ R ☒ M Number 1.1	**In M1-1, replace: have a procedure** **with: make available its procedure.**
63.3	☐ R ☐ M Number	**Replace Standard 63.3 title: Transmission Protection Maintenance and Testing** **with: Transmission Protection System Maintenance and Testing".**
68.0	☐ R ☐ M Number	**In purpose replace: end users of electricity on the bulk electric system to drop loads.** **with: the dropping of end use load from the bulk electric system. The standard does not require action by the end users, it requires action by the LSEs, TOs, TOp, and DP.**
68.3	☐ R ☒ M Number 3.1	**Add at the end of M3-1, in their undervoltage loadshedding program technical assessment. The elements in R3-1, are for inclusion in Technical Assessments of undervoltage loadshedding programs not for programs themselves.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
68.3	☐ R ☐ M Number	**In Non-Compliance Level 4, clarify what one of the requirements means. MAPP PSDWG prefers breaking this level into two levels of non-compliance.**
68.4	☒ R ☐ M Number 4.2	**In R4-2, replace: Regions** **with: Regional Reliability Organizations.**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

MAPP Part 1 Comments Attachment A for Draft 2 Version 0

Term	Change	Justification
Interconnected System	add	Terms frequently used or any key term integral to a standard should be defined.
Interface	add	Terms frequently used or any key term integral to a standard should be defined.
Outage	add	Terms frequently used or any key term integral to a standard should be defined.
Power	add	Terms frequently used or any key term integral to a standard should be defined.
Rating	add	Terms frequently used or any key term integral to a standard should be defined.
Region	modify	Delete Electric out of the definition.
Reliability	add	Terms frequently used or any key term integral to a standard should be defined.
Reserve	add	Terms frequently used or any key term integral to a standard should be defined.
Substation	add	Terms frequently used or any key term integral to a standard should be defined.
Voltage Collapse	add	Terms frequently used or any key term integral to a standard should be defined.
Entities Responsible for the Reliability of the Interconnected Transmission Systems	delete	Term is no longer used in the standards; instead the parties who are responsible for complying with the standard are individually listed.

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**MAPP Operating Subcommittee**	
Organization:	**MAPP (Part 2 - Comments on translated Operating Policies)**	
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☒ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☒	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **MAPP Operating Subcommittee**

Lead Contact: Robert Coish

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Additional Member Name	Additional Member Organization	Region*	Segment*
Derrick Moe (Chair)	WAPA	MAPP	2
Todd Gosnell	OPPD	MAPP	2
Larry Larson	OTP	MAPP	2
John Swanson	NPPD	MAPP	2
Paul Koskela	MP	MAPP	2
Dick Pursley	GRE	MAPP	2
Martin Trence	Xcel Energy	MAPP	2

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments

There was divided opinion among the OSC members on this issue as well as in MAPP. There was strong opinion that NERC should get this issue under control by clearly defining the roles RC and RA if they are going to coexist, even if only during a transition period. The functional model needs to be fixed. Also, the registration process must be consistent with a term change from RA to RC. There is also concern about some RA's reprting to other RA's with regard to the confusion this might cause. The other approach which has been proposed is to have the term RA with RC's registering as RA's. Regardless of which approach is chosen there needs to be a clear assessment of the issues and an implementation plan developed to facilitate and minimize the unavoidable transition. Note that the OSC did not identify any of these approaches as a show stopper.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

As in question 1, there was divided opinion among the MAPP OSC members. Refer to comments in Question 1.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

An implementation plan would be required to adopt Alternative B. There is insufficient time for developing coordination, a program and implementing training for Alternative B. Not all committee members held this position.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Refer to comments in Part 1 of MAPP response.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
Section 55.3. See comments in Part 1 of MAPP response.One member considered all sections of 055 to be NAESBY business practice.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☒ Yes.

☐ No.

Comments

Refer to comments in Part 1 of the MAPP response. Some members were of the opinion that Distribution Providers who own Transmission facilities should register as Transmission Ownwers as well as Distribution providers..

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Operating Security Limit	☐ Delete ☒ Add ☐ Modify	**Used in Constrained Facility definition**
Contingency Reserve-Spinning	☐ Delete ☒ Add ☐ Modify	**Used in Contingency Reserve definition**
Contingency Reserve-Supplemental	☐ Delete ☒ Add ☐ Modify	**Used in Contingency Reserve definition**
GLDF	☐ Delete ☐ Add ☒ Modify	**Remove paranthetical expresions at the end**
IROL	☐ Delete ☐ Add ☒ Modify	**Capitalize the A in MVAr to be consistent with the IEEE standard. The A is for Ampere, a proper noun requiring capitalization.**
ERCOT	☐ Delete ☒ Add ☐ Modify	**Used in definition for Interconnection.**
TLR	☐ Delete ☒ Add ☐ Modify	**Used in TLR Log and Reallocation definitions**
Overlap Regulation Service	☐ Delete ☐ Add ☒ Modify	**Change AGC/ACE to ACE**
	☐ Delete ☐ Add ☐ Modify	
Reserve Sharing Group	☐ Delete ☐ Add ☒ Modify	**This definition needs to be made broader, i.e. not restricted to BAs, since the reserve sharing can be among Load Serving Entities as it is in MAPP.**

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
The MAPP OSC does not see any show stoppers in Draft 2 Version 0.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Standard 2, R5 changes what constitutes a reportable disturbance. The new language states that A Reserve Sharing Group shall be considered in a Reportable Disturbance condition whenever a group member has experienced a Reportable Disturbance and calls for the activation of Contingency Reserves from one or more other group members. The existing policy states REPORTABLE DISTURBANCES are contingencies that are greater than or equal to 80% of the MOST SEVERE SINGLE CONTINGENCY loss. The current interpretation is that a reportable disturbance is 80% of the reserve sharing groups most severe single contingency loss and not 80% of the largest single contingency loss for each BA. This will mean a lot more reportable disturbances for the MAPP region. This also appears to be in conflict with Measurement 1 which indicates the reportable disturbance is 80% of the reserve sharing group's largest contingency. The restrictions on formatting in the comment form are unacceptable and do not facilitate compilation of many sources of comments!

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
1.0	☐ R ☐ M Number	**In the Process section the reset period fpr CPS2 states you will have 0 violations in a calender month. The requirement is to have 90% of the clock 10-minute periods without a violation. It is not likely that anyone will reset with this criteria. The reset criteria should be meeting the CPS2 requirement for one calendar month.**
1.0	☒ R ☐ M Number 3.0	**No measures associated with Requirement 3.**
1.0	☒ R ☐ M Number 4.0	**No Measures associated with Requirement 4.**
2.0	☒ R ☐ M Number 4.0	**Second paragraph is missing a close bracket.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
20.0	☐ R ☒ M Number 1.0	**Measures 1 and 2 are not in the exisiting Policy 5 and should be removed from standard 020.**
17.0	☐ R ☐ M Number	**Source reference should be Policy 4 - Section D, not Section B**
24.0	☒ R ☐ M Number 18.0	**The translation does not appear correct in referencing all requirements 1-17 in order to be consistent with Policy 6A 6.4. Shouldn't requirements 15-17 only be referenced?**
27.0	☐ R ☐ M Number	**Compliance Monitoring Process,Self-Certification,item 4, appears incorrect as it appears to have been translated from P6T3 and refers to contingency plan rather than restoration plan.**
28.0	☒ R ☐ M Number 1.0	**tems h,i appear to be translated incorrectly as they seem to be from P6T2(assessment notes 8 & 9) rather than P6T3. Item i specifies restoration plan rather than contingency plan.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
28.0	☐ R ☐ M Number	**Level of Non-Compliance. This appears to be referencing P6T2 language. Shouldn't this be translated from P6T3?**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name: **ISO/RTO Council Standards Review Committee**		
Organization: **ISO/RTO Council**		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☒ NA - Not Applicable	☐	1 - Transmission Owners
	☒	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **ISO/RTO Council Standards Review Committee**

Lead Contact: Karl Tammar

Contact Organization: ISO/RTO Council

Contact Segment: 2

Contact Telephone: 518-356-6205

Contact Email: ktammar@nyiso.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Dale McMaster	AESO	WECC	2
Ed Riley	CAISO	WECC	2
Sam Jones	ERCOT	ERCOT	2
Don Tench	IMO	NPCC	2
Peter Brandien	ISO-NE	NPCC	2
Bill Phillips	MISO	EC/MA	2
Karl Tammar	NYISO	NPCC	2
Bruce Balmat	PJM	MAAC	2
Charles Yeung	SPP	SPP	2

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

The ISO/RTO SRC appreciates the efforts of the Standards Drafting Team for their work in the development of draft 2 of Version Zero within the stipulated short time period. We believe it is important to deploy a workable set of V0 standards aligned to the functional model.

Our concern with the Draft 2 standards is that responsibilities are now assigned to multiple authorites (i.e. transmission operator OR reliability authority will…). Having two entities with a reliability designation with overlapping roles and authorities introduces confusion and may lead to reliability problems.

We believe there should be one "ultimate authority" for wide-area oversight. As an interim measure, we support the retention of the existing RC and the existing operating agreements between the RC and those they are coordinating. NERC needs to urgently address the ambiguities between the current roles of the RC and the future responsibilities of the RA.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

As stated in our response to question 1, the Functional Model must be updated to clearly and unambigously define appropriate responsibilities for the authority entities.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

If a standard is dependent on information that is included in a guide to be complete and implementable, then the guide needs to be included in the standard and subject to the same ANSI process for approval and revision as the standard. Guides providing supplemental information could be created as stand alone reference documents. Consideration of this should be addressed in the Version 1 Standards development process.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

As stated in the question, Phase III and Phase IV standards should be reviewed by the Planning Standards Task Force as soon as possible. Any standards needed to support the NERC blackout recommendations may and should be entered into the standards development process as Urgent Action SARs separate from Version 0.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

Methodologies for developing and review of ATC values should be developed as NAESB Business Practices.

Methodologies for developing and review of TTC must remain as a NERC Reliability Standard.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
The IRC would note that the definition of Capacity Benefit Margin is not universally computed using Generation Planning criteria. There is no Generation Planning criteria in the current reliability standards and it is not uncommon to use Installed or Available capacity obligations as opposed to Generation criteria.

Standard 55 makes frequent reference to providing NERC and transmission users with updated CBM values. As written, the standard requires that CBM values be available to transmission users. CBM is used by RA and Transmissio Operators, not transmission users. NERC may examine an entity's REVIEW process, but as there is no agreed to NERC criteria on CBM, there is no need for NERC to examine the procedures used to compute CBM.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
The use of TRM is a reliability tool so the methodology to calculate TRM should remain a Reliability Standard.

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Various	☐ Delete ☐ Add ☒ Modify	**Several terms in the Glossary do not have definitions. The Glossary needs to be completed and reposted.**
Regional Reliability Organization	☐ Delete ☐ Add ☒ Modify	**It is important that this definition be developed.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
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	☐ Delete ☐ Add ☐ Modify	
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The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

The ISO/RTO Council fully supports the Version 0 concept and hopes that outstanding issues can be resolved.

The ISO/RTO Council is concerned about the resolution of the RA v. RC issue.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

In many standards, the compliance monitoring role has been assigned to an "Unaffiliated Third Party". Is this entity intneded to be an "RRO"?. We suggest this role/terminology to be clarified and defined in the version 0 glossary.

It appears that presently there are different sources for NERC definitions of the BES. The BES definition has remained a continued issue. We are of the opinion that at this stage the suggested definition of BES be augumented by allowing regions to implement their definitions based on appropriate regional criteria indicating what facilities are impacted Accordingly, the version 0 BES definition should be modified.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

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Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	.

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

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A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:	**Bonneville Power Administration - PBL - Generation Scheduling**
Lead Contact:	Deanna Phillips
Contact Organization:	Bonneville Power Administration - PBL Generation Scheduling
Contact Segment:	5
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Additional Member Name	Additional Member Organization	Region*	Segment*
Kathy Craig	BPA PBL Generation Scheduling	WECC	5

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

As presented, the Bonneville Power Adminsitration (BPA) supports the decision to reassign current Reliability Coordinator responsibilities to the Reliability Authority when the NERC Functional model is implemented. .

Gerry Cauley very clearly expressed the dilemna that the drafting team faces with partial implemenetation of the functional model in The Request to Register Entities Responsible for Implementing Version 0 Standards. The Reliabilaity Coordinators are clearly not the only Reliability Authorities in existence. Their authority comes through delegation by the existing Control Areas, usually by means of a clearly defined operating agreement. The control areas continue to have first line responsibility for reliability. The Reliability Coordinators, who have an extensive wide-area view, are authorized to issue directives. Those directives are issued to the control areas, which implement the directives. This arrangement can not be overridden by rushing to implement the functional model, nor is it necessary to do so. 7

BPA further advises the Drafting Team if the decision is made not to reassign these responsibilities, BPA believes such action would be a show stopper.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☒ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

As the version 0 standards near completion, a matrix of which standards apply to each function should be developed. Experience with the standards and compliance monitoring can provide future direction on how to modify the standards and if necessary, the functional model.

BPA further advises the Drafting Team if the decision is made to apply all transmission system responsibilitieis to the Transmission Operator in Version 0 and defer implementation of the Reliability Authority into the future BPA believes such action would be a show stopper.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Alternative B will capture both small and large dynamic transfer transactions by changing from a straight 25% deviation to a 25 MW per hour devliation for transaction up to 250 MW and a 10% deviation for transactions greater that 250MW

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

The purpose of Version 0 is to provide enforcable standards. Since Guides and White Papers are not standards, and thus not enforceable. Therefore, they should not be included in the standards. We agree valuable information is provided in applicable guides and white papers and recommend that such documents be reviewed and updated and then maintained in a reference library.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☒ Do not agree with dropping these planning standards from Version 0.

Comments

Removal of some of the standards that were listed in the August 14 Blackout Recommendations as possible violations is unacceptable. Old Planning Standards I.D.S1; II.B.S1 and S2; and 3.C.S1 and S2 were listed as possible standards violations that contributed to the Blackout. These standards must be included in the Version 0 standards. Waiting for a Urgent action SAR to rememdy the issues that came up in field testing and having no standard is in place in the meantime is not acting responsibly.

BPA believes that removing any of the Planning standards listed in the August 14th Blackout Recommendations from Version 0 is a show-stopper.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

We do not feel that 060 standards must apply to all Distribution Facilities. They should apply only to those Distribution Facilities that have an effect upon an IROL.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
All terms defined in existing NERC Glossary still in use.	☐ Delete ☒ Add ☐ Modify	**Necessary for understanding of what is meant by Defined Terms used in Standards, Guides, White Papers, etc..**
All terms defined in Policies, Guides, White Papers, etc..	☐ Delete ☒ Add ☐ Modify	**These definitions are critical to proper understanding of NERC Standards, Guides, White Papers, etc..**
All Capitalized terms used must be in the NERC or NAESB Glossary.	☐ Delete ☐ Add ☐ Modify	**Otherwise, only confusion can result doe to different definitions, etc..**
NERC Glossary contain Reliability Terms.	☐ Delete ☐ Add ☐ Modify	**Best source of definition.**
NAESB Glossary contain Market Terms.	☐ Delete ☐ Add ☐ Modify	**Best source of definition.**
No term should be in both NERC and NAESB Glossaries.	☐ Delete ☐ Add ☐ Modify	**Leads to confusion as to "the right definition".**
When necessary, NERC and NAESB rely upon eachother's Glossary.	☐ Delete ☐ Add ☐ Modify	**Leads to consistancy and clarity and is the only hope for common understanding.**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any "show stoppers" in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
BPA believes the following are potential show-stoppers:

1. Removal of the ability of Generation Providing Entities to assess and approve or deny tags, as allowed in Policy 3.

We ask that Standard 011 be modified to give back to Generation Operators and Load Serving Entities the tag approval rights that they presently have under Policy 3A.

The current Policy 3A Interchange Transaction assessment No. 4 clearly states "The Generation Providing Entities, Load Serving Entities, Transmission Providers, Control Areas on the Schedule Path and other operating entities responsible for operational security shall be responsible for assessing and "approving" or "denying" Interchange transactions as requested by Purchasing-Selling Entities based on established reliability criteria and adequacy of Interconnected Operations Services and transmission rights, as well as the reasonableness of the Interchange Transaction tag."

Standard 011, R2 clearly states the "Transmission Service Providers on the Scheduling Path shall be responsible for assessing and approving the Interchange Transaction based on the established reliability criteria and adequacy of Interconnected Operating Services and transmission rights as well as the reasonableness of the Interchange Transaction tag."

Version 0, Section 011, R3 clearly states the" Balancing Authorities on the Scheduling Path shall be responsible for assessing and approving the Interchange Transaction".

However, nowhere in Section 011 (or any other Version 0 Standard) is it stated that Generation Operators and Load Serving Entities will be able to continue to assess and approve, from a reliability standpoint, all Interchange Transaction that involve their resources and loads, as they do today under Policy 3A. By removing these tag approval rights from entities such as Generator Operators and Load Serving Entities that presently have them, Standard 011 is in direct conflict with the fundamental Version 0 requirement that "changes to existing policies and procedures would not occur".

Therefore, we ask that Standard 011 be modified to give back to Generation Operators and Load Serving Entities the tag approval rights that they presently have under Policy 3A.

In addition to breaking the principle of "not changing what is done today under existing policy", the policy changes proposed in tag approval rights by Standard 011 will result in lower levels of reliability. In our experience, errors in specifying the Generator or LSE on a tag are not uncommon. Furthermore, these are not the types of tag errors that either Transmission Service Providers or Balancing Authorities always have enough information to catch. On the other hand, the Generation Operators and Load Serving entities are the best ones to evaluate whether or not the tag represents an actual transaction that should be associated with their generator or load. If these errors are not caught prior to the start of the hour, then reliability is adversely impacted because IOS Services that the Balancing Authority intended to be used for either Contingency Reserves or Load Following throughout the hour must be used to follow the load/recource balance deviations caused by the erronious tags that the Generation Operators and Load Serving Entities were not able to deny prior to delivery, as they do today. The fact that these IOS Services are then not available for their intended use definately results in lowered levels of reliability.

To assume the Generation Providing Entities or Generator Operator ONLY performs a marketing function and NOT a reliability function is an erroneous assumption. Many Generator Operators provide significant reliability to assure it is providing enough of Interconnected Operating Services to the Transmission Service Provider to properly maintain system reliability. Additionally, the Generator needs to have the ability to control its generation and provide reliable generation inputs to the Transmission Operator. They cannot do this if they are not able to have input into the approval process for the tags determining the specific transactions that their resources must service each hour. The Transmission Operator cannot have a reliable system unless the Generator has the ability to manage and control its generators. If, for example, a Generator is named on a tag as the Generator and that is in error, how exactly will the Transmission Service Provider recognize this error? The Generator Operator must have the ability to assess and approve or deny interchange transactions that commit a resource or should commit a resource, which could affect the reliability of the power system and the amount of Interconnected Operating Services. Again, the Generator Operator does not only provide a marketing function.

We strongly urge the drafting team make changes to Standard 011 to include reference to Generator Operators as an entity responsible in ensuring Interchange Transaction information is correct and can make reliability assessments of approving and denying a tag. Failure to recognize the Generator Operator performing such tasks in Version 0 would be a show-stopper to BPA.

2. As mentioned previously in Question No. 1 above, BPA supports the decision to reassign current Reliability Coordinator responsibilities to the Reliability Authority when the NERC Functional model is implemented. BPA further advises the Drafting Team if the decision is made not to reassign these responsibilities, BPA believes such action would be a show stopper.

3. As stated in our answer to Question No. 2 above, BPA further advises the Drafting Team that BPA believes that any decision to apply all transmission system responsibilities to the Transmission Operator in Version 0 and defer implementation of the Reliability Authority into the future would be a show stopper if the .

4. As stated in our answer to Question No. 5 above, BPA feels that removal any of the Planning standards listed in the August 14th Blackout Recommendations from the Version 0 standards would be a show-stopper.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.4	☒ R ☐ M Number	**In Requirement R4-1, the first paragraph of this new standard says to test a number of each of the extreme contingencies while the old standard says to evaluate only those that would produce the more severe system impacts (the first bullet in item c of this requirement has the correct wording). This language should be corrected to be consistent.**
58.5	☐ R ☒ M Number	**Measure M5-1 Measure should not be that the RRO has evidence that it contributed to the development of cases but rather that the cases are available and solved so that the measure matches the Compliance Levels.**
58.6	☐ R ☒ M Number -61.0	**Measure M6-1should not be that the RRO has evidence that it contributed to the development of the models but rather that the models are available and solved and included no errors so that the measure matches the Compliance Levels.**
60.1	☒ R ☐ M Number	**Requirement R1-1, item a should included the words -as applicable for each owner- after the words -the items listed-. Not all owners will have all the pieces of equipment listed.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
60.1	☒ R ☐ M Number	**Requirement R1-1 also includes the requirement for Generator owners to provide data. However the list does not include any generation equipment. Although information on the generation equipment is necessary, it is not included in the existing standard. This needed information should be flagged as missing for the Transmission Plan SAR 500 Team to address.**
2.0	☒ R ☐ M Number 3.1	**An important part of this requirement that is missing from what is written here is that the specified recovery MUST occur within the Disturbance Recovery Period; which is presently specified as 15 minutes. Rectify this by adding "within the Disturbance Recovery Period" to the end of the first sentence of this requirement.**
2.0	☐ R ☐ M Number 0.0	**PURPOSE: - An important part of this standard that is missing from the Purpose section is that the specified recovery MUST occur within the Disturbance Recovery Period. Rectify this by adding the phrase "within the Disturbance Recovery Period" to the first sentence of the Purpose paragraph between the words "limits" and "following".**
2.0	☒ R ☐ M Number 2.1	**Add the words "or Reserve Sharing Groups" to the end of this requirement. This clarifies that the same Contingency Reserves can also not be counted towards meeting the obligations of two separate Reserve Sharing Groups.**
2.0	☐ R ☐ M Number 0.0	**REGIONAL DIFFERENCES: Add as a Regional Difference the fact that WECC Contingency Reserve Restoration Period is 60 minutes; which is shorter than the 90 minute NERC requirement. The WECC requirement is in the WECC Minimum Operating Reliability Criteria Section 1.A.4.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
2.0	☐ R ☒ M Number 1.0	**Though they are technically correct, the first two sentences of the first paragraph are located in the wrong section of this standard. Since they refer to which disturbances must be reported on for compliance purposes, they belong in the Compliance Monitoring Process section of this standard.**
2.0	☐ R ☐ M Number	**COMPLIANCE MONITORING: This section is deficient in that it lacks specific information regarding WHICH DISTUBANCES must be included in the periodic reports referred to in the second paragraph. Moving the information addressing this issue in the first two sentences of the first paragraph of M1 to between the first and second paragraphs of this section will resolve this confusion.**
3.0	☒ R ☐ M Number 1.0	**Understanding this requirement is dependent upon knowing what a Frequency Response Characteristic is and the relationship between it and a Control Area's Frequency Bias. This potential for confusion can be resolved in one of two ways. Either (1) avoid use of specific defined terms by changing the end of the first sentence to "in the characteristics of the frequency response of its BA Area. Or (2) define Frequency Response Characteristic and Frequency Bias in sufficient detail the Glossary.**
3.0	☒ R ☐ M Number 2.0	**The words "as close as practical to" are not sufficiently difinitive enough to enable this requirement to be measurable. Since existing policy does not give any further guidance in this area, we ask that this issue be forwarded to the appropriate Version 1 Drafting Team for resolution.**
4.0	☐ R ☐ M Number	**REGIONAL DIFFERENCE: Neither the WECC MORC nor the WECC Procedure for Time Error Control make provision for this type of termination of a Time Error Correction. Therefore, either (1) change Requirement R4.1 to a Regional Difference for the Eastern Interconnection or (2) add as a Regional Difference that WECC Time Error corrections cannot be terminated at the request of a Balancing Authority. Which alternative is most appropriate probably depends upon whether or not ERCOT allows for it.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
5.0	☐ R ☐ M Number	**PURPOSE: To properly communicate the purpose of this complex standard to those who are unfamiliar with this subject, it is necessary to first discuss "what we are trying to accomplish" before stating "how we will to accomplish it through use of ACE and Regulating Reserves". This can be achieved by reverseing the order of the two sentences in this paragraph and rewording them such that they flow appropriately.**
5.0	☒ R ☐ M Number 3.0	**The words "prevent such service from becoming a burden upon …" are not sufficiently difinitive enough to enable this requirement to be measurable. Since existing policy does not give any further guidance in this area, we ask that this issue be forwarded to the appropriate Version 1 Drafting Team for resolution.**
5.0	☒ R ☐ M Number 11.0	**A fundamentally important point of this requirement is that the Banancing Authorities must agree upon THE SAME ramp rate. Agreeing that they will both use different ramp rates is not to be allowed under this requirement. To close this potential hole in the requirement, please modify this requirement to use the phrase "… use common agreed upon ramp rates …".**
5.0	☒ R ☐ M Number 12.1	**The two sentences of this requirement are actually two separate requirements that will require separate measures for compliance. Therefore, we ask that they be split into two separate requirements.**
5.0	☒ R ☐ M Number 12.3	**Replace the words "Dynamic Schedule or Psuedo Tie" with the defined term Dynamic Transfer.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
5.0	☒ R ☐ M Number 13.0	**The two sentences of this requirement are actually two separate requirements that will require separate measures for compliance. Therefore, we ask that they be split into two separate requirements.**
5.0	☒ R ☐ M Number 16.0	**The first sentence of R 16 essentially repeats R 8 of this same standard. Please reorder the requirements of this standard so that these related requirements are next to eachother in the same area of the standard**
5.0	☒ R ☐ M Number 0.0	**Placing the requirements in this standard in the order that they appeared in the NERC Policies has resulted in them being in a confusing and seemingly random order. Calrity of this standard would be improved immensely if these many requirements were to be reordered in more of a building block approach; beginning with the most fundamental and working toward the most complex. A suggestion would be to put them in the order of R1, R6 - R8, R13 - R16, R9 - R12, R2, R3, R4, R5.**
5.0	☒ R ☐ M Number 16.0	**The phrase "shall sample data" is not specific enough about "what data" as to enable this requirement to be measurable. If possible, please list specifically what data or types of data are meant. If existing policy is not specific enough in this area to be able to do this as a part of Version 0 then, we ask that this issue be forwarded to the appropriate Version 1 Drafting Team for resolution.**
5.0	☒ R ☐ M Number 16.0	**The three sentences of this requirement are actually three separate requirements that will require separate measures for compliance. Therefore, we ask that they be split into two separate requirements.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
6.0	☒ R ☐ M Number 4.0	**The two sentences of this requirement are actually two separate requirements that will require separate measures for compliance. Therefore, we ask that they be split into two separate requirements.**
6.0	☐ R ☐ M Number	**The section 1G1.1 of the Compliance Monitoring Process talks specifically about a requirement for the BA to do AIEs to submit data to NERC for analysis purposes. Since AIE is not a part of the NERC Compliance Program at this time, this section should be moved to in the Requirements section of this standard.**
9.0	☒ R ☐ M Number 10.0	**R4 and R10 of this standard are dealing with the same thing in virtually the same way. Therefore, R10 should be merged with R4 such that the result contains everything related to this requirement.**
9.0	☒ R ☐ M Number 9.0	**To add clarity and reflect the sequencing of the actions involved, please move R9 to R5.2.**
13.0	☒ R ☐ M Number 3.0	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Raj Rana**	
Organization:	**AEP**	
Telephone:	**614-716-2359**	
Email:	**raj_rana@AEP.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☒	5 - Electric Generators
	☒	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☒ Disagree.

Comments

This is a complex issue that may require a modification to the Functional Model in order to resolve. The present definition of the Operating Reliability function is: "Ensures the real-time operating reliability of the interconnected bulk electric transmission systems with a Reliability Authority Area." Further, the Fucntional Model states that responsible entity is the Reliability Authority. Further, the Reliablity Authority is required to "Calculates Interconnection Reliability Operating Limits based upon Transmission Owners' and Generator Owners' specified equipment ratings." Some have interpreted this to mean that the RA only needs visibility to a level that allows them to determine IROL's. This would suggest that another entity is then responsible for the reliability of those facilites not required to be moniotred by the RA. However, the Functional Model only lists one responsible entity, the RA for the Operating Reliability function. Maybe is should list two; the RA and the Transmission Operator. This would also require expading the list of duties by the Transmission Operator.

It is clear that the Functional Model intended a transistion from today's Reliability Coordinators to the Functional Model's Reliability Authority. That is not to say that only a RC can become an RA. Rather, it implies that the fucntion and role of today's RC will be replaced by the RA of the future. Future RA's could come from the existing RC's, existing Control Areas, or other existing operating entities, as long as they meet all the requirements of an RA. The key here is meeting all the requirements. Therefore, we propose the following as options at this time for the Version 0 Standards regarding the RC v. RA issue:

Option #1) Define two entities to be responsible for the Operating Reliability Function: The Reliability Coordinator for ensuring the real-time operating reliability of the interconnected bulk electric transmission systems within a Reliability Coordination Area by having the ability to determine and monitor IROL's and the Reliability Authority for ensuring the real-time operating reliability of the portion of the interconnected bulk electric transmission systems within a Reliability Coordination Area that is not subject to nor contribute towards creating IROL's within the RC Area or adjacent RC Area. The RA is a subset of the RC and is responsible and answers to the RC. The RA monitors the lower voltage transmission system not monitored by the RC. The RC should have a defined list of monitored facilties. This list can be changed based upon the topology of the system and responsiveness of the facilities to electrical flows in the Interconnect.

Option #2) Define two entities to be responsible for the Operating Reliability Function: The RA for ensuring the real-time operating reliability of the interconnected bulk electric transmission systems within a Reliability Authority Area by having the ability to determine and monitor IROL's and the Transmission Operator for ensuring the real-time operating reliability of the portion of the interconnected bulk electric transmission systems within a Reliability Authority Area that is not subject to nor contribute towards creating IROL's within the RA Area or adjacent RA Area. The tasks of the RA and Transmission Operator would need to be further expanded such as to clearly show that the Transmission Operator is subordinate to the RA in any issue of disagreement or discrepancy, similar to the enhancements made in Policy 9 regarding the RC. As this option requires changes to the Functional Model, the Drafting Team would have to state up front in the Version 0 Standard itself that it is assumed such changes would occur. This option would not use the term "RC" within Version 0.

Option #3) This option is a transition solution only. Remove the Reliability Authority entity from Version 0 as was done for Interchange Authority. Use the term "RC" in its place. This would best describe the current practice until Organizational Certification issues can be resolved and any modifcations to the Functional model are made.

We prefer Option #2, but can support all three options. Finally, we'd like to be clear that the Draft 2 changes using both RC and RA in Version 0 are unacceptable. As worded in Draft 2, it is confusing regarding which entity is responsible for each task. Additionally, it is still not clear as to what entities can and can not register to be an RA. We believe as presently worded in Draft 2, the cripsness obtained by recent revisions to NERC Operating Policies 5, 6 and 9 are lost.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Neither of these two choices are acceptable. As stated in our response to question #1, we prefer our Option #2 as outlined above under the response to Question #1. We believe it inappropriate to introduce the Reliability Coordinator as a responsible entity in Version 0 as the RC is not an entity in the Functional Model. If the functional model is still broken and needs clarification, then maybe all of Version 0 should be put on hold until the Functional Model is modified (fixed). However, it will never be perfect. We need to keep in mind that today's RC's can register as RA's for Version 0. Registration as an RA for Version 0 does not mean you have to be or are capable of performing all RA tasks in the Functional Model. It means you can perform the RA tasks in Version 0, which is a direct mapping of tasks from the Operating Policies perrfomed by the RC's today.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☒ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Per the charge to the Drafting Team, they are not to make changes to existing policy, just translate the policy. This is outside the scope of the Drafting Team. If the Drafting Team strongly supports alternate B above, they can submit it as a SAR for consideration after implementation of Version 0.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

Just because voluntary guides are not included as Standards, does not mean they can not be published as "Guidelines" by NERC and posted on the NERC website as such. How will ANSI or whoever certifies the NERC Standards Making Process, look at the inclusion of these guides in the standards? Could inclusion result in the guides becoming standards?

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☒ Do not agree with dropping these planning standards from Version 0.

Comments

With the total elimination of Standard 59 (Sysetem data Modeling Requirements - Generation Equipment) the only source of any generation modeling data is via Standard 58-1 R1-1 (and dynamic data via 58-3) through regional procedures. The requirement of Generation Owners to supply basic modeling data must be explicit and unambigious in the NERC Reliability Critiera. Either restore this essence of Standard 59 or change Standard 58 to reflect this requirement.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

The TTC value is a reliability based value, simply, it is a quantification of the capacity of the bulk transmission system. As such, any determination of TTC must remain as a NERC related Standard. The TTC/ATC methodologies and calculations must remain the responsibility of both the RC and the TSP. The transmission Owner and/or the Transmission Operator are the data sources for Facility ratings. Although the ATC values are for commerical uses, its based upon that 'ultimate' capacity of the transmission system and the mathematical derivation of ATC is based upon the necessity of maintaining the reliability of the bulk transission system. Incorrect calculation of ATC, especially if any ATC value is posted higher than appropriate, will result likely result in overselling of the transmission system capacity setting up actual reliability issues in real time operation. It is appropriate and prudent to ensure that the capacity remaining on the transmission system, for any future time, regardless of use (incremental commercial use, new load connections, for example) must be determined under relaibility based criteria and coordinated with NAESB.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
The Capacity Benefit Margin is a quantification of the value of the interconnections to adjacent systems for or during generation capacity emergencies. In essence, CBM is merely a transmission reservation on a potentially importing system only to be used for extreme generation events. CBM is only a transmission 'right' on the importing system, and does not assure access to any generation resouce at any time. Since CBM only assures that there is a quantity of transmission capacity on the importing portion of the transmission path, it has questionable value in real-time conditions. Nevertheless, the calcuation of the CBM quantity, as well as the verification of the values and use, continue to be closely related to the relaibility function and, therefore, should remain a NERC governed standard.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
The Transmission Reliability Margin is a margin used in the ATC process to allow for the various 'unknowns' assumed in the ATC process. These 'unknowns' include variation from forecasted load, variations in genertion dispatch, transmission outages on neighboring system etc. Since this is a reliaiblity based value, the TRM must remain within the NERC reliability criteria, parallels that of ATC.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☒ Yes.

☐ No.

Comments

The Distribution Provider was not added to the list of entities that must comply with Standard 060. Any references to Distribution Provider compliance within this Standard must be carefully worded to specify transmission/distribution interface issues, such as protection schemes, so as to avoid attempts to misinterprete bulk electric system reliabiliyt standards on distribution reliability practices.

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Bulk Electric System	☐ Delete ☐ Add ☒ Modify	**100 kV and above. The 100 kV threshold is presently used in the NERC Planning Standards definition of Bulk Electric System.**
Constrained Facility	☐ Delete ☐ Add ☒ Modify	**Change OSL to SOL and IROL**
Balancing Authority	☐ Delete ☒ Add ☐ Modify	**Acronym is BA**
Regional Reliability Organization (Region)	☐ Delete ☒ Add ☐ Modify	**Acronym is RRO**
Available Transfer Capability (ATC)	☐ Delete ☒ Add ☐ Modify	**Standard 54 uses this term and Standard 54-1 requires a "Methodology" to determine, but the Standard lacks a definition of the term. Definition not in Glos**
Disturbance Control Standard	☐ Delete ☒ Add ☐ Modify	**Add the acronym, DCS.**
GLDF	☐ Delete ☐ Add ☒ Modify	**Modify to read "… to determine the total impact of a generator serving load on an identified…".**
Total Transfer Capability	☐ Delete ☒ Add ☐ Modify	**See above under ATC**
Transmission Reliability Margin	☐ Delete ☒ Add ☐ Modify	**Standard 56 uses this term and Standard 56-1 requires a "Methodology" to determine, but the Standard lacks a definition of the term. Definition not in Glos**
Capacity Benefit Margin	☐ Delete ☒ Add ☐ Modify	**Standard 55 uses this term and Standard 55-1 requires a "Methodology" to determine, but the Standard lacks a definition of the term. Definition not in Glos**

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

We are not impressed with either numbering scheme. Cross referencing old and new will become more confusing. However, the numbering scheme is the least of our concerns. We suggest the numbering scheme is not all that important and that the industry can adapt to just about any scheme. We suggest the Drafting Team focus on consistent conversion of the Operating Policies and Planning Standards and leave the numbering scheme issue as a low priority item..

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

For Operating Standards, the conditions we impose is satisfactory resolution of the RC v. RA issue as noted in our response to Question #1 and not including Guides in Version 0 as noted in response to Question #4.

For Planning Standards, we are undecided. Based upon the number of planning standards that will not survive in any form upon adoption of Version 0, we current question the value of this effort.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

For Operating Standards, the inclusions of Guides in Version 0 and not satisfactorily resolving the RC v. RA issue, which Draft 2 does not accomplish.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
9.0	☒ R ☐ M Number 6.0	**The 30-minute action time does not apply to SOL violations unless those violations have become IROL violations. The reference to SOL violations should be deleted.**
20	☐ R ☐ M Number	**In Sections 2.4, 2.4.4, 3.4, 3.4.2, 3.5 and 3.5.1 of Attachment 020-1 of Standard 020, replace OSL with SOL/IROL terminology.**
58.1	☒ R ☐ M Number	**The term "Responsibe Entity" is capitalized, and therefore a defined term, but it is not defined. Therefore, either define the term as Generation and Transmission Owners, or list the "Responsible Entities" such as generation owner, transmission owner, etc. Making an 'entity' responsible to a NERC Relaibility Standard via reporting procedures developed by each of the regions is dubious and surely not obvious which entities are subject to this standard.**
58.3	☒ R ☐ M Number	**See comment from 58.1. Same issue.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.1	☐ R ☒ M Number	**Typo - Remove "None identified" at end of description.**
51.4	☒ R ☐ M Number	**Typo - 5th line of Requirements statement should be "may be necessary" rather than "maybe necessary"**
53.2	☒ R ☐ M Number	**Typo - "reliability assessments shall [delete] to NERC"**
	☐ R ☐ M Number	**General comment: It appears that a new term "Unaffiliated Third Party" has been introduced as the Compliance Monitor. Would NERC be an UTP? What is the basis for this new terminology?**
	☐ R ☐ M Number	

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Draft 2 of Proposed Version 0 Reliability Standards

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A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Kevin Wright**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Two comments one directly below Requirements and above R2-1.
Second comment really a question - in R2-2 at end.

Standard 053.2 Coordination of Plans for New Generation, Transmission, and End-User Facilities

Requirements:
Comment: Either Planning Authority should be added to R2-1 (The Planning Authority, Generator Owner....) or Planning Authority should be removed from M2-1 and R2-2, M2-1, and M2-2
R2-1. The Generator Owner, Transmission Owner, Distribution Provider, or Load Serving Entity seeking to integrate generation facilities, transmission facilities, and electricity end-user facilities shall coordinate and cooperate on their respective assessments to evaluate the reliability impact of the new facilities and their connections on the interconnected transmission systems. The assessment shall include:
a) Evaluation of the reliability impact of the new facilities and their connections on the interconnected transmission systems.
b) Ensurance of compliance with NERC Reliability Standards and applicable Regional, subregional, power pool, and individual system planning criteria and facility connection requirements.
c) Evidence that the parties involved in the assessment have cooperated on the assessment of the reliability impacts of new facilities on the interconnected transmission systems. While these studies may be performed independently, the results shall be jointly evaluated and coordinated by the entities involved.
d) Evidence that the assessment included steady-state, short-circuit, and dynamics studies as necessary to evaluate system performance in accordance with Reliability Standard 051.
e) Documentation that the assessment included study assumptions, system performance, alternatives considered, and jointly coordinated recommendations.

R2-2. The Planning Authority, Transmission Planner, Generator Owner, Transmission Owner, Load Serving Entity, and Distribution Provider shall retain its documentation (of its evaluation of the reliability impact of the new facilities and their connections on the interconnected transmission systems) for three years and shall provide the documentation to the (Comment: Do you mean RRCs or RROs or really both in what follows?) Regional Reliability Council Organizations and NERC on request (within 30 calendar days).

Measures:
M2-1. The Planning Authority, Transmission Planner, Generator Owner, Transmission Owner, Load Serving Entity, and Distribution Provider's documentation of its assessment of the reliability impacts of new facilities shall address all items in Reliability Standard 053.2-R2-1.

M2-2. The Planning Authority, Transmission Planner, Generator Owner, Transmission Owner, Load Serving Entity, and Distribution Provider shall have evidence its assessment of the reliability impacts of new facilities and their connections on the interconnected transmission systems is retained and provided to other entities in accordance with Reliability Standard 053.2- R2-2.

Regional Differences:
None identified

Compliance Monitoring Process:

Timeframe:

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Jerry L Nicely**	
Organization:	**Tennessee Valley Authority**	
Telephone:	**423-751-8236**	
Email:	**glnicely@tva.gov**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☒ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☒	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*
i			

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

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☒ Agree.

☐ Disagree.

Comments
TVA does not support the concept that RA equals RC.
TVA does not feel that both RA & RC should be included in Version 0 - it needs to be one or the other.
TVA feels that the RC should be in Version 0 where it applies to Policy 9 and therefore the RA needs to come out of Version 0 at this time.
Where RA is used in Version 0, outside of Policy 9, it should be replaced with Transmission Owner, Transmission Operator, or Balancing Authority as appropriate.
Leave implementation of the RA concept to future versions.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments
In order to solve industry confusion, leave RA out of the model.
Make the Reliability Coordinator responsible for Policy 9 in Version 0.
Transmission Owner, Transmission Operator and/or Balancing Authority should replace the RA for applicable policies outside Policy 9.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

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R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☒ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments
TVA Agrees, if you eliminate the word "these" in the above response.
For clarification, all guides should be labled "Should be considered" as opposed to "shall be considered".

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

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- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments
They should be proposed as new standards, using the Urgent Action SAR process as appropriate.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☒ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
Reliability Authority	☒ Delete ☐ Add ☐ Modify	
Reliability Authority Area	☒ Delete ☐ Add ☐ Modify	
Transmisson Owner	☐ Delete ☒ Add ☐ Modify	**acronym TO** **this is often used to refer to the Transmission Operator**
Transmission Operator	☐ Delete ☒ Add ☐ Modify	**TOP** **so as not to be confused with Transmission Owner**
Reliability Coordinator	☐ Delete ☐ Add ☒ Modify	**to reflect modifications made based on comments to remove BA from Version 0**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☒ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments
However, there is still a lot of flux in the functional responsibilities and their acronyms

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☒ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

We feel that inclusion of both RA & RC creates confusion.
Phase III & IV Planning Standards shouldn't be included in the third draft of Version 0.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

We appreciate all the time and hard work of the Standards Drafting Team and all others who made contributions to this process.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
20.0	☒ R ☐ M Number 2.0	**Remove "Reliability Coordinator". RC does not own or operate generation. BA has a capacity and energy emergency plan. RC implements EEA process.** **RA needs to come out.**
20.0	☒ R ☐ M Number 4.0	**Insert after Reliability Coordinator, "who has a Balancing Authority"**
20.0	☐ R ☒ M Number 1.0	**Delete "Reliability Coordinator"3 times** **Delete "Reliability Authority" 3 times**
20.0	☐ R ☐ M Number	**Attachment 020-1 - replace "Operating Security Limits" with "System Operating Limits" throughout the attachment**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
22.0	☐ R ☐ M Number	**Attachment 022-1 - replace "Operating Security Limits" with "Interconnected Reliability Operating Limit" .**
27.0	☒ R ☐ M Number 10.0	**5.c To be consistent with Standard 040 R5, this requirement needs to be modified to state that the Reliability Coordinator approval must be obtained prior to resynchronization of major islands**
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

A revision to Question 7 is the only change that has been made.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**John Simonelli**	
Organization:	**ISO New England**	
Telephone:	**Ph: (413) 535-4157**	
Email:	**jsimonelli@iso-ne.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☒	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☐ Agree.

☐ Disagree.

Comments

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☐ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☐ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☐ Disagree with including these guides in Version 0.

Comments

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☐ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☐ No.

Comments

Question 7: Add Distribution Provider to 060 Facility Ratings?

Should the Distribution Provider be added to the list of entities that must comply with Standard 060 (Facility Ratings).

☐ Yes.

☐ No.

Comments

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

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Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☐ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☐ Would not approve the standards.

☐ Would abstain.

Comments

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Comment on Template 010
Why do we once again require the sink BA to put tags in for a commercial transaction? The example is jointly owned units, well why not the majority owner PSE or a designated PSE by the unit owners or anyone but the BA? If this unit is commercially sold to entities outside the BA boundary, how does the BA know where it ends up, who is buying it and what transmission arrangements have been made outside the BAs boundary? It seems other than emergency, reserve sharing, loss of gen/load or inadvertent, the BA should be left OUT of the tagging game. This is a commercial venture and if someone from the commercial sector fails to tag it, it doesn't flow and someone losses $$$. Bet they tag in next time. The BA has insufficient information to complete the tag beyond their borders.
The problem is in today's world the CA most likely has enough information to tag a transaction like this. I am not as confident the BA under the FM will have that capability nor will they have the authority under the BA Standards. Does that standard require the BA to do anything more than balance his generation, load, losses, reserves and interchange? If I'm a BA (remember under the FM the BA does not have wide area purview like many of today's CAs have), I may not be able to do this. Should we write a standard that requires an entity to do something they can't do under the FM??? Remember this is not simply an exercise in converting the Policies to Standards, it's also supposed to integrate the FM. We will have BAs under the version 0 standards with compliance measures. I want to make sure we don't put the BA between a rock and a hard place.

Comment on Template 011
The Purpose of templates 011 states that this standard is to provide the data to all entities needing to make a reliability assessment. In the body of the standards we specifically spell out what the TSP and BA need to do with the data. Just curious, what about what the TO needs to do, doesn't the TO (or RA/RC) do the true reliability assessment, i.e., can these MW actually reliably flow on my system at this time? The TSP Functional Model Technical Specifications document actually states, "The TSP does NOT itself have a role in maintaining system reliability in real time – that is the RA and TOs responsibility." One could argue spelling out what the TO (or RA/RC) does is more important than what the TSP does, in fact one could argue a lot of what the TSP does in this standard is "commercial" not" reliability" based.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

Interchange Subcommittee Version 0
Discussion Document

Item 1

John Simonelli's comments are in black and blue and Roman Carter's comments in Red.

Why do we once again require the sink BA to put tags in for a commercial transaction?

Comment by RC: Current Policy under 3A 1.2 states "If a PSE is not involved in the Transaction, such as delivery from a jointly owned generator, then the Sink BA is responsible for providing the tag".

Again, based on the intent of V-0, our mission is not to change Policy, but to ensure the Policy is translated over correctly. It is understandable that some of us may not be happy with current policy, but we do not need to try to change policy without Industry input such as what we had with the Dynamic Scheduling debacle. The IS and the NERC/NAESB CI teams all labeled this area of Policy 3 as a reliability area needing addressed by NERC. Had all the groups decided way back in October of 2003 that this was business issue, we certainly could have included in the NAESB V-0 Standard.

The example is jointly owned units, well why not the majority owner PSE or a designated PSE by the unit owners or anyone but the BA? If this unit is commercially sold to entities outside the BA boundary, how does the BA know where it ends up, who is buying it and what transmission arrangements have been made outside the BAs boundary? It seems other than emergency, reserve sharing, loss of gen/load or inadvertent, the BA should be left OUT of the tagging game. This is a commercial venture and if someone from the commercial sector fails to tag it, it doesn't flow and someone losses $$$. Bet they tag in next time. The BA has insufficient information to complete the tag beyond their borders.

The problem is in today's world the CA most likely has enough information to tag a transaction like this. I am not as confident the BA under the FM will have that capability nor will they have the authority under the BA Standards. Does that standard require the BA to do anything more than balance his generation, load, losses, reserves and interchange? If I'm a BA (remember under the FM the BA does not have wide area purview like many of today's CAs have), I may not be able to do this. Should we write a standard that requires an entity to do something they can't do under the FM??? Remember this is not simply an exercise in converting the Policies to Standards, it's also supposed to integrate the FM. We will have BAs under the version 0 standards with compliance measures. I want to make sure we don't put the BA between a rock and a hard place.

Comment from Ron Donahey on yesterday's call:
The requirement must be put on ONE party. If the requirement references more than one party (if it is one party OR another) then we are creating confusion and a potential reliability problem.

Item 2
Additional Language for Standard 013, Requirement 1

From Roman Carter: During our recent IS meeting in Philadelphia the IS chairman asked that Roman Carter draft language for IS comment on the Version 0, draft 2 which would include TLR's and Congestion Management requirements in Requirement 1 of Standard 013. .

R1.1.3 [Policy 3D 2.1] When a system condition necessitates using a Transmission Loading Relief (TLR) procedure to curtail Interchange Transactions to ensure reliable operation of the electrical system, the Sink Balancing Authority (Sink BA) shall coordinate the modifications to the appropriate tags.

R1.1.4 [Policy 3D 2.2] When a local or regional system condition or a transmission line overload condition necessitates curtailing Interchange Transactions, the Transmission Service Provider (TSP) and the affected Balancing Authority (BA) shall implement the curtailment and coordinate the modification to the appropriate tags.

From Roman Carter:
During our recent IS meeting in Philadelphia, I was asked to draft language for the IS comments on the Version 0, draft 2 which would include TLR's and congestion management requirements in Requirement 1 of Standard 013. More particularly, I have drafted language for a new R1.1.3 and a R1.1.4.

R1.1.3 [Policy 3D 2.1] When a system condition necessitates using a Transmission Loading Relief (TLR) procedure to curtail Interchange Transactions to ensure reliable operation of the electrical system, the Sink Balancing Authority (Sink BA) shall coordinate the modifications to the appropriate tags.

R1.1.4 [Policy 3D 2.2] When a local or regional system condition or a transmission line overload condition necessitates curtailing Interchange Transactions, the Transmission Service Provider (TSP) and the affected Balancing Authority (BA) shall implement the curtailment and coordinate the modification to the appropriate tags.

From Al Boesch:
If I recall correctly the reason that we added Scheduling Entity to section D 2.2 was to allow intermediary Control Areas to modify a tag using regional procedures. The part of the Control Area that is most likely to monitor the transmission system is the transmission operator. I would suggest that the following wording:
R1.1.4 [Policy 3D 2.2] When a local or regional system condition or a transmission line overload condition necessitates curtailing Interchange Transactions, the Transmission Service Provider (TSP) and the affected Transmission Operator shall implement the curtailment and coordinate the modification to the appropriate tags.

If this does not work than use BA and TOP. I will let someone from the Western Region provide more information on how they operate if this information is wrong.

From Melinda Montgomery:
In Roman's proposed language for standard R1.1.4, he indicates that the TSP and the affected BA will be responsible for implementing the curtailment and coordinating modification of the tags. I thought that both the Source BA and the Sink BA were responsible for implementing a change in interchange schedule. Also, it is inconsistent with standard R1.1.3.

I prefer that only one functional entity be responsible for coordination of the tag changes. I think that having two different functional entities responsible for coordinating modification to tags is confusing and leaves room for error. I suggest that we change the proposed standard to read as follows (as an alternative, the standard could apply only to the affected BA):

R1.1.4 [Policy 3D 2.2] When a local or regional system condition or a transmission line overload condition necessitates curtailing Interchange Transactions, the Transmission Service Provider (TSP) shall coordinate the modification to the appropriate tags.

From Roman Carter:
Melinda, I do not have a problem with changing the language to best fit what actually happens in today's real world.

The only drawback, however, is that the V-0 team is translating Policy into the Standard directly and without changing the meaning. As the V-0 team was told on numerous occasions "If current Policy is not ideal, then it will remain non-ideal in Version 0 unless Industry has a chance to vote on it like in the Dynamic Schedules.

Item 3
Comment from John Simonelli on the Template 011 including the Template Purpose:
We state this standard is to provide the data to all entities needing to make a reliability assessment. In the body of the standards we specifically spell out what the TSP and BA need to do with the data. Just curious, what about what the TO needs to do, doesn't the TO (or RA/RC) do the true reliability assessment, i.e., can these MW actually reliably flow on my system at this time? The TSP Functional Model Technical Specifications document actually states, "The TSP does NOT itself have a role in maintaining system reliability in real time – that is the RA and TOs responsibility." One could argue spelling out what the TO (or RA/RC) does is more important than what the TSP does, in fact one could argue a lot of what the TSP does in this standard is "commercial" not" reliability" based.
End

Standard Title	010 Interchange Transaction E-Tagging	
Source References	Policy 3 — Interchange: Section A — Interchange Transaction Implementation Compliance Template P3T3	
Purpose	To ensure that Interchange Transactions, certain Interchange Schedules, and ~~certain~~ intra-Balancing Area transfers using point-to-point transmission service are E-T~~t~~agged. ~~in adequate time to allow the transactions to be assessed for reliability impacts before being approved by the affected Reliability Coordinators, Reliability Authorities, Transmission Service Providers and Balancing Authorities, and to allow adequate time for implementation.~~	Response: Assessment and reliability is redundant with the Purpose for template 011. This template is to ensure that transactions are E-Tagged.
Effective Date	February 8, 2005	
Applicability	1. Purchase-Selling Entities. 2. Balancing Authorities.	~~1.~~
Requirements	R1 [Policy 3A 1.2] The load-serving Purchasing-Selling Entity shall be responsible for ~~tagging~~ ensuring E-T~~t~~ags are submitted for: a) [Policy 3A 2.1] A~~a~~ll Interchange Transactions ~~(those~~ that are between Balancing Authority Areas; b) [Policy 3A2.1] A~~) and a~~ll transfers that are entirely within a Balancing Area using point-to-point transmission service (including all grandfathered and "non-Order 888" point-to-point transmission service); and c) [Policy 3A 2.1] A~~. The load-serving Purchasing-Selling Entity shall be responsible for tagging a~~ll Dynamic Schedules at the expected average MW profile for each hour. R2 The Sink Balancing Authority shall be responsible for ensuring a E-T~~t~~ag is provided: a) [Policy 3A 1.2] If a Purchasing-Selling Entity is not involved in the Transaction.~~, such as delivery from a jointly owned generator.~~ ~~R2~~b) [Policy 3A 2.1] ~~The sink Balancing Authority shall be responsible for tagging all Interchange Transactions establish~~To~~ed to~~ replace unexpected generation loss, such as through prearranged reserve sharing agreements or other arrangements, and all emergency transactions to	Response: R2.a - The IS recommends taking out "such as delivery from a jointly owned generator." The IS does not believe that the Sink BA should be responsible for submitting E-Tags for a jointly owned generator. (See Item 1 in attached Version 0 Discussion document). Response: R5 – The IS recommends deleting this item, as it is not a reliability requirement and should be sent to NAESB. Response: For R2.b include the language, "regardless of magnitude or duration" as this is a minor clarification.

mitigate SOL or IROL violations. Such interchange shall be ~~exempt from tagging for~~E-T~~t~~agged within 60 minutes from the time at which the Interchange Transaction begins, regardless of magnitude or duration~~, regardless of magnitude or duration~~.

~~R3~~c) ~~[Policy 3A 2.1] The sink Balancing Authority shall be responsible for tagg~~A~~ing a~~ll Bilateral Inadvertent Interchange Payback.

~~R4~~R3 [Policy 3A 2.4] The Balancing Authority or Purchasing Selling Entity responsible for submitting the E-T~~t~~ag shall submit all E-T~~t~~ags to the Sink Balancing Authority according to timing tables in Attachment 010-1.

R4 [Policy 3A 2.] The Balancing Authority or Purchasing Selling Entity responsible for submitting the E-T~~t~~ag shall include the reliability data listed in Attachment 010-2 in the E-T~~t~~ag.

~~R5 [Policy 3A 1.3] Each Purchasing Selling Entity with title to an Interchange Transaction shall have, or shall arrange to have, personnel directly and immediately available for notification of Interchange Transaction changes. These personnel shall be available from the time that the title to the Interchange Transaction is acquired until the Interchange Transaction has been completed.~~

Measures

M1 [P3T3] A Balancing Authority shall meet 100% of the E-T~~t~~agging requirements for all scheduled interchange between Balancing Authority Areas and within the Balancing Area.

Response: The measure should ensure that all Interchange is E-Tagged and that the BA only enters into its ACE equation "composite approved" E-Tagged Interchange.

Regional Differences

WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver effective on November 21, 2002.
MISO Energy Flow Information Waiver effective on July 16, 2003.
~~:~~

~~oInadvertent Payback~~
~~oDynamic Schedules~~

Compliance Monitoring Process

Not Specified.

Levels of Non

Not Specified.

Compliance

Attachment 010-1 — Tag Submission and Response Timetables for New Transactions

Eastern Interconnection – New Transactions

The table below represents the ~~recommended business practices for~~ tag submission and assessment deadlines within the Eastern Interconnection. These are default requirements; some regulatory or provincially approved provider practices may have requirements that are more stringent. Under these instances, the more restrictive criteria shall be adhered to. The table describes the various minimum submission and assessment timing requirements.

Table 1: Eastern Interconnection – Timing Requirements

Transaction Duration	PSE Submit Deadline*	Actual Tag Submission Time	Provider Assessment Time	Time to Start of Transaction
Less than 24 Hours	20 Minutes prior to start	≤1 Hour prior to start	≤ 10 Minutes from tag receipt	≥ 10 Min
		>1 to <4 hours prior to start	≤20 Minutes from tag receipt	≥ 40 Min
		≥ 4 Hours prior to start	≤ 2 Hours from tag receipt	≥ 2 Hours
24 Hours or longer	4 Hours prior to start	Any	≤ 2 Hours from tag receipt	≥ 2 Hours
*Start time references are for start of the Transaction not the start of the ramp.				

Tag submission timing requirements are based on the duration of the Transaction. Tags representing Transactions that run for less that one day (24 hours) must be submitted at least 20 minutes prior to the start of the Transaction (excluding ramp time). Tags representing Transactions running for one day or more (24 hours or more) must be submitted at least four hours prior to the start. Tags submitted that meet these requirements shall be considered "on-time" ~~by the E-Tag system~~ and may be granted conditional approval. Tags submitted that do not meet these requirements shall be considered "late" ~~by the E-Tag system~~, and consequently will be denied if not explicitly approved by all parties.
~~The E-Tag system accepts tags with a start time up to one hour prior to the current time. Tags with a start time older than one hour will be rejected as invalid. This one-hour window shall be used to submit tags to document emergency actions taken to mitigate an Operating Security Limit violation (Policy 3, Section A-2.4.1). This provision shall not be used to schedule Transactions without the proper tag (Policy 3, Section A-6.1).~~

Tag assessment timing requirements are based on the submission time of the tag, as well as the duration. Hourly tags submitted one hour or less prior to start must be evaluated in ten minutes. Hourly tags submitted more than one hour but less than four hours prior to start must be evaluated in 20 minutes. Tags ~~with~~ of a duration ~~of~~ less than 24 hours that are submitted four hours or more prior to start must be evaluated in two hours. Tags ~~with~~ of a duration ~~of~~ 24 hours or more must be evaluated in two hours.

Eastern Interconnection — Reallocation ~~TLR Event~~During a Transmission Loading Relief Event

During a NERC TLR event, Transactions may be submitted to replace existing Transactions with a lower transmission priority. The new Transaction tag must be received ~~by the Interchange Distribution Calculator~~ no later than 35 minutes prior to the top of the hour to allow time for Reliability ~~Authority~~ Coordinator to assess the impact of reallocation.

Western Interconnection – New Transactions

The table below represents the ~~recommended business practices for~~ tag submission and assessment deadlines within the Western Interconnection. These are default requirements. The tables describe the various minimum submission and assessment timing requirements.

Table 2: Western Interconnection – Timing Requirements

Transaction Start/Submittal Time	Late Status Deadline	Actual Tag Submission Time*	Provider Assessment Time	Approval/ Denial Notes	Time to Start of Transaction*
Start 00:00 next day or beyond when submitted prior to 18:00 of the current day	15:00 day prior to start	Any	3 hours	Passive Approval if submitted before deadline, else Passive Denial. Deferred denial	≥ 6 Hours
Start 00:00 next day and submitted between 18:00 and 23:59:59 on day prior to start – OR – start within current day		≥ 4 Hours prior to start	2 Hours from tag receipt	Passive Approval Deferred denial	≥ 2 Hours
		<4 Hours to ≥1 Hour prior to start	20 minutes from tag receipt	Passive Approval Deferred denial	≥ 40 Min
		<1 hour to ≥30 minutes prior to start	10 minutes from tag receipt	Passive Approval Deferred denial	≥ 20 Min
		<30 minutes to ≥20 minutes prior to start	10 minutes from tag receipt	Passive Approval Deferred denial	≥ 10 Min
	20 minutes prior to start	<20 minutes prior to start	5 minutes from tag receipt	Passive Denial. Deferred denial	Submission time minus maximum time of 5 minutes

Notes/Clarification:

1. All clock times are in PPT.
2. Tags falling under the criteria in yellow are deemed pre-schedule tags.
3. Tags falling under the criteria in green are deemed real-time tags.
4. Pre-schedule tags submitted between 15:00 and 18:00 will be assigned LATE composite status.
5. Real-time tags submitted after 20 minutes prior to the start of the Transaction will be assigned LATE composite status.

*Start-time references are for start of the Transaction, not the start of the ramp.

Tag submission timing requirements are based on the type and duration of the Transaction. Tags representing Transactions that run for less that one day (24 hours) within the current day must be submitted at least 20 minutes prior to the start of the Transaction (excluding ramp time). Tags representing Transactions that are pre-scheduled to start the next day must be submitted by 1500 PST the day prior to the day the Transaction is to start. Tags submitted that meet these requirements shall be considered "on-time" ~~by the E-Tag system~~ and may be granted conditional approval. Tags submitted that do not meet these requirements shall be considered "late"~~ by the E-Tag system~~, and consequently will be denied if not explicitly approved by all parties.

~~The E-Tag system accepts tags with a start time up to one hour prior to the current time. Tags with a start time older than one hour will be rejected as invalid. This one-hour window shall be used to submit tags to document emergency actions taken to mitigate an Operating Security Limit violation (Policy 3, Section A 2.4.1). This provision shall not be used to schedule Transactions without the proper tag (Policy 3, Section A 6.1).~~

Tag assessment timing requirements are based on the submission time of the tag, as well as the duration. Hourly tags submitted one hour or less prior to start must be evaluated in ten minutes. Hourly tags submitted more than one hour but less than four hours prior to start must be evaluated in 20 minutes. Tags ~~with~~ of a duration ~~of~~ less than 24 hours that are submitted four hours or more prior to start must be evaluated in two hours. Tags submitted for pre-scheduled service starting the next day or a future day must be evaluated in three hours.

Attachment 010-2 — Required Tag Data

The following is the reliability information necessary to assess a Transaction:

1. Physical path — the description of physically scheduling parties, always containing a generation segment, at least one transmission segment, and a load segment.
2. Generation — the physical characteristics of the energy source.
3. Resource service point — the physical point at which the energy is being generated. This may vary in granularity, depending on local practices.
4. Energy profile — energy to be produced by the generator for each time segment of the Transaction.
5. Transmission — the physical characteristics of a wheel (import, export, or through).
6. Transmission Service Provider — the identity of the Transmission Service Provider that is wheeling the energy.
7. Point of receipt — valid point of receipt for scheduled transmission reservation.
8. Point of delivery — valid point of delivery for scheduled transmission reservation.
9. Scheduling entity(ies) — entities that are physically scheduling interchange on behalf of the Transmission Service Provider in order to provide wheeling services. Typically this is the Balancing Authority providing a service for the Transmission Service Provider, but several Balancing Authorities may be supporting a regional transmission service.
10. Loss provision — the manner in which losses are accounted when they are not scheduled as in-kind megawatt distributions through the original transaction or through a separately tagged transaction.
11. POR and POD Profiles — schedule of energy flow imported at the Point of Receipt and Exported at the Point of Delivery.
12. Transmission reservation — reference to a particular transmission reservation being used to provide transmission capacity to support the transaction being described.
13. Transmission product — the firmness of service associated with the transmission reservation being used.
14. Load — the physical characteristics of the energy sink.
15. Resource service point (sink) — the physical point at which the energy is being consumed. This may vary in granularity, dependent on local practices.
16. Energy profile — energy to be consumed by the load for this Transaction.
17. Contact person of the Purchasing Selling Entity responsible for the tag.

The following information is required to modify a Transaction:

~~17.~~18. The Transaction being curtailed or reloaded.

~~18.~~19. All necessary profile changes to set the maximum flow allowed for the transaction during the appropriate hours.

~~19.~~20. A contact person that initiated the curtailment or reload.

Standard	011	
Title	Interchange Transaction E-Tag Communication and Reliability Assessment	
Source References	Policy 3 — Interchange: Section A.— Interchange Transaction Implementation Section B. — Interchange Schedule Implementation P3T3 Compliance Template	
Purpose	To ensure that ~~the tag~~Interchange Transaction information is provided to all entities needing ~~the tags~~ to make reliability assessments and to ensure all affected reliability entities assess the reliability impacts of Interchange Transactions before approving or denying a E-T~~t~~ag. To communicate the approvals and denials of the E-T~~t~~ag and the final composite status of the E-T~~t~~ag.	Response: Purpose (See attached Version 0 Discussion paper - Item 3).
Effective Date	February 8, 2005	
Applicability	1. Balancing Authorities. 2. Transmission Service Providers. 3. Transmission Operator.	~~1.~~
Requirements	R1 [Policy 3A 2.2] The Sink Balancing Authority shall ensure that all E-T~~t~~ags and any modifications to E-T~~t~~ags are provided to the following entities on the Scheduling Path~~for reliability assessment~~: —a) Sink and Source Balancing Authority or their designated Scheduling Agent. —b) Intermediate Balancing Authorities. —c) Transmission Service Provider(s). d) Security Analysis Services (IDC or other regional reliability tools). e) Transmission Operators, Reliability Authority(ies), and Reliability Coordinators who may receive the information through Security Analysis Services.~~(receives through IDC)~~ ~~Security Analysis Service (IDC or other regional reliability tools)~~ R2 [Policy 3A 4.] Transmission Service Providers on the Scheduling Path shall be responsible for assessing and approving or denying the Interchange Transaction based on established reliability criteria and adequacy of Interconnected Operating Services and transmission rights.~~ as well as the reasonableness of the Interchange Transaction Tag~~. The Transmission Service Provider shall verify and assess: —a) Valid OASIS reservation number or transmission contract identifier. —b) Transmission priority matches reservation.	Response: R2 – How does one define the "reasonableness" of a E-Tag? This should be deleted. Response: R2.f. – Loss *accounting* is not material to reliability and should be removed from this standard. *Scheduling* of losses *is* a reliability concern. Response: R1.e – After resolution of the RA/RC this item may need to be revisited. **Comment to V0 DT** - There are questions about reliability assessment and the relationship between the TOPs and RCs for reliability. Who does what? Current practices vary throughout the country. The TSP requirements for reliability assessment are in current policy but the Functional Model places the assessment on the TOP. Further clarification is needed on the requirements for the TSP, TOP and RC before some of the requirements in templates 010 – 013 can be finalized. In general, the TSP has nothing to do with the transaction after selling the

—c) Energy profile fits within OASIS reservation.
—d) OASIS reservation accommodates ~~multiple~~ all Interchange Transactions.
—e) Connectivity of adjacent Transmission Service Providers.
—f) Loss ~~accounting~~scheduling.

transmission. The IS is not sure how the TSP will, or can, check the connectivity of transmission service or if the connectivity requirement should be the TSP's responsibility.

R3 [Policy 3A 4.] Balancing Authorities on the Scheduling Path shall be responsible for assessing and approving or denying the Interchange Transaction. The Balancing Authority shall verify and assess:
—a) Transaction start and end time.
—b) Energy profile~~, including the ramp~~ (ability ~~of the generation~~ to support the magnitude ~~and maneuverability~~ of the transaction).
c) Ramp (ability of generation maneuverability to accommodate).
—d) Scheduling path (proper connectivity of adjacent Balancing Authorities).

~~R5~~R4 ~~————————~~[Policy 3A 5] Each Balancing Authority and Transmission Service Provider on the ~~scheduling~~ Scheduling ~~path~~ Path shall communicate their approval or denial of the Interchange Transaction to the Sink Balancing Authority.

~~R6~~R5 [Policy 3A 5. and Policy 3B 3.] Upon receipt of approvals or denials from all of the individual Balancing Authorities and Transmission Service Providers, the Sink Balancing Authority shall communicate the composite approval status of the Interchange Transaction to the Purchasing-Selling Entity and all other Balancing Authorities, Transmission Service Providers ~~and Reliability Authorities~~ on the ~~scheduling~~ Scheduling ~~path~~Path and through the Security Analysis Service to affected Transmission Operators, Reliability Authorities, and Reliability Coordinators.

Measures Not Specified.

Regional Differences MISO Scheduling Agent Waiver dated November 21, 2002. MISO Enhanced Scheduling Agent Waiver dated July 16, 2003.
~~oScheduling Agent Waiver~~
~~oEnhanced Scheduling Waiver~~

Compliance Monitoring Process Not Specified.

Levels of Not Specified.

Non Compliance

Standard Title	012 Interchange Transaction Implementation
Source References	Policy 3 — Interchange: Section B — Interchange Schedule Implementation Compliance Template P3T3
Purpose	To ensure Balancing Authorities confirm Interchange Schedules with adjacent Balancing Authorities prior to implementing the schedules in their ACE equations. To ensure Balancing Authorities incorporate all confirmed schedules into their ~~ACC~~ ACE equations.
Effective Date	February 8, 2005
Applicability	1. Balancing Authorities. ~~1.~~
Requirements	R1 [Policy 3B 4.] Each Receiving Balancing Authority shall confirm Interchange Schedules with the Sending Balancing Authority prior to implementation in the Balancing Authority's Area Control Error (ACE) equation ~~or in the system that calculates the Balancing Authority's Area Control Error equation~~. R1.1 [Policy 3B 4.1] The Sending Balancing Authority and Receiving Balancing Authority shall agree on: —a) Interchange Schedule start and end time. —b) Energy profile. c) [Policy 3C 3.] Ramp start time and duration (Balancing Authorities shall use the ramp duration established for their Interconnection unless they agree to an alternative ramp duration.) Default ramps durations are as follows: ~~(α)~~• Default ramp ~~rate~~ duration for the Eastern Interconnection shall be 10 minutes equally across the Interchange Schedule start and end times. ~~(β)~~• Default ramp ~~rate~~ duration for the Western Interconnection shall be 20 minutes equally across the Interchange Schedule start and end times. ~~(χ)~~• Ramp durations for Interchange Schedules implemented for compliance with NERC's Disturbance Control Standard (recovery from a disturbance condition) and Interchange Transaction curtailment in response to line loading relief procedures may be shorter than the above defaults, but must be identical for the Sending Balancing Authority and Receiving Balancing Authority.

—R1.2 [Policy 3B 4.1.3] If a DC tie is on the ~~contract~~ ~~p~~Scheduling Path, then the Sending Balancing Authorities and Receiving Balancing Authorities shall coordinate the Interchange Schedule with the Transmission Operator of the DC tie.

R1.3 [Policy 3C 3.3] Balancing Authorities that implement Interchange Schedules that cross an Interconnection boundary shall use the same start time and ramp durations.

R2 [Policy 3B 1.] Balancing Authorities shall implement Interchange Schedules only with Adjacent Balancing Authorities.

~~R3 [Policy 3C 1.] Balancing Authorities shall begin and end Interchange Schedules at a time agreed to by the Source Balancing Authority, Sink Balancing Authority, and Intermediary Balancing Authorities.~~

Response: R3 - This statement is a redundant with other requirements in 012 and should be omitted.

R4 [Policy 3B 6.] The Sink Balancing Authority shall be responsible for initiating implementation of each Interchange Transaction as E-T~~t~~agged. Upon receiving composite approval from the Sink Balancing Authority, e~~E~~ach Balancing Authority on the scheduling path shall ~~incorporate each Interchange Transaction~~enter confirmed schedules into ~~its Interchange Schedules~~its ~~AGC~~ ACE equation.

Response: R5 - Delete R5 because it is inconsistent with the Functional Model. The BA will not know if Interchange Schedules cause any other system to violate established operating criteria. This is not a BA responsibility under the FM. The requirements should be addressed in another Version 0 template and assigned to the RC or TA because this is a local reliability concern.

~~R5 [P3 4.1.2] Balancing Areas shall operate such that Interchange Schedules do not knowingly cause any other systems to violate established operating criteria.~~

Measures Not Specified.

Regional Differences MISO Scheduling Agent Waiver dated November 21, 2002.~~Waivers:~~
MISO Enhanced Scheduling Agent Waiver dated July 16, 2003.
MISO Energy Flow Information Waiver dated July 16, 2003.
~~oScheduling Agent Waiver~~
~~oEnhanced Scheduling Waiver~~
~~oEnergy Flow Information Waiver~~

Compliance Monitoring Process Not Specified.

Levels of Not Specified.

Non Compliance

Standard	013	
Title	Interchange Transaction Modifications	
Source References	Policy 3 — Interchange: Section D — Interchange Transaction Modifications Compliance Template P3T3	
Purpose	To allow reliability modifications to ~~an~~ Interchange Transactions. ~~to address potential or actual SOL or IROL limit violations or other reliability condition. To ensure dynamic transfers are adequately tagged to be able to determine their reliability impacts.~~	Response: The purpose should not contain the details of the requirements.
Effective Date	February 8, 2005	
Applicability	1. Balancing Authorities. ~~2.Transmission Service Providers~~ ~~3.~~2. Reliability Authorities. 3. Reliability Coordinators. 4. Purchasing-Selling Entities. 5. Transmission Operator	~~1.~~Should Transmission Operator be added to the list (see new R1.3)?
Requirements	R1 [Policy 3D 1., 1.2, 1.3] If a Reliability Coordinator, Reliability Authority, Transmission Operator, or Source or Sink Balancing Authority, or affected Balancing Authority, due to a reliability event, needs to modify an Interchange Transaction that is in progress or scheduled to be started, the entity shall modify the Interchange Transaction E-T~~t~~ag, and [[Policy 3 1.5] shall communicate the modification to the Sink Balancing Authority. Reliability events ~~may include~~are: a) Transmission Loading Relief procedure curtailment — Eastern Interconnection. b) Interconnection, regional, or local overload relief or congestion management procedures. c) SOL or IROL potential or actual limit violation. d) Loss of generation. e) Loss of load.~~Any Reliability Authority, Transmission Service Provider, Source Balancing Authority, or Sink Balancing Authority that requires modification to an Interchange Transaction due to loss of generation, loss of load, or a TLR event (or other regional congestion management practices) shall set a new limit on the Interchange Transaction tag that is in progress or scheduled to be started, and shall communicate this new limit to the Sink Balancing Authority.~~ R1.1 –[Policy 3D 2.3 and 2.3.1] A Generator Operator or Load Serving Entity may request the Host Balancing	

Authority to modify an interchange transaction due to loss of generation or load.

R1.1.1 [Policy 3D 2.3] When a loss of generation necessitates curtailing Interchange Transactions, the Source Balancing Authority shall coordinate the modifications to the appropriate E-T~~t~~ags.

R1.1.2 [Policy 3D 2.4] When a loss of load necessitates curtailing Interchange Transactions, the Sink Balancing Authority shall coordinate the modifications to the appropriate E-T~~t~~ags.

Add the following requirements under R1 (See Version 0 Discussion document Item 2).

R2 Upon receipt of modification to an Interchange Transaction as described in Requirement 1, the Sink Balancing Authority (Source Balancing Authority in the case of a loss of generation) shall communicate the modified information about the Interchange Transaction, including its composite approval status, to all Balancing Authorities, Transmission Service Providers, and Reliability Authorities on the Transaction path and the Purchasing-Selling Entity responsible for the Transaction.~~The Sink Balancing Authority shall be responsible for implementing the required modifications to the Interchange Transactions tag to comply with the specified new limit set in Requirement 1.~~

R1.2 [Policy 3D 2.1] When a system condition necessitates using a Transmission Loading Relief (TLR) procedure to curtail Interchange Transactions to ensure reliable operation of the electrical system, the Sink Balancing Authority shall coordinate the modifications to the appropriate E-Tags.

R3 At such time as the reliability event allows for the reloading of the transaction, the entity that initiated the curtailment shall release the limit on the Interchange Transaction tag to allow reloading the transaction and shall communicate the release of the limit to the Sink Balancing Authority.

R1.3 [Policy 3D 2.2] When a local or regional system condition or a transmission line overload condition necessitates curtailing Interchange Transactions, the Transmission Operator or the affected Scheduling Entity, shall implement the curtailment and coordinate the modifications to the appropriate E-Tags.

~~R4 A Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall modify the tag when the energy profile deviates by more than 25% from the previously tagged energy profile.~~

Comment to V0 DT – Should the Transmission Operator, TSP, or both be referenced in R1.3. Should the TOP, TSP, or both have curtailments rights or should they be required to communicate curtailment information to the RC?

R~~5~~4 A Reliability Coordinator, Reliability Authority, Balancing Authority or ~~Purchasing-Selling Entit~~Transmission Operator~~y~~ ~~wishing~~ needing to modify an Interchange Transaction shall submit a request to modify the E-T~~t~~ag to the Sink Balancing Authority according to the timing tables in Attachment 013-1.

Response: The Interchange Subcommittee supports Alternative B for E-Tagging Dynamic Schedules.

DYMAMIC SCHEDULING E-TAG REVISION — ALTERNATIVE A: CURRENT POLICY

Comment to V0 DT – It is still unclear if

	R5 [3A 2.1 and P3T4] The Purchasing-Selling Entity responsible for E-T~~t~~agging a Dynamic Interchange Schedule shall ensure the E-T~~t~~ag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the E-T~~t~~ag by more than +25% . DYNAMIC SCHEDULING E-TAG REVISION — ALTERNATIVE B: NEW PROPOSAL R5 The Purchasing-Selling Entity responsible for E-T~~t~~agging a Dynamic Interchange Schedule shall ensure the E-T~~t~~ag is updated for the next available scheduling hour and future hours when any one of the following occur: R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the E-T~~t~~ag by more than +10%. R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the E-T~~t~~ag by more than +25 megawatt-hours. R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.	a dynamic schedule E-Tag needs to be revised for the current hour or just for future hours. If the schedule is outside the MW limit for the current hour, but it is believed that the schedule will be correct for future hours, should the schedule be revised?
Measures	~~Not Specified.~~M1 The Sink Balancing Authority shall provide evidence that a revised E-T~~t~~ag was provided when the deviation exceeded the criteria in Requirement 5.	
Regional Differences	WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver~~:~~ dated November 21, 2002. ~~oTagging Dynamic Schedules and Inadvertent Payback~~	
Compliance Monitoring Process	~~[P3T4]~~ Monitoring Responsibility: Regional Reliability Organization. Measuring Processes: Periodic E-T~~t~~ag audit as prescribed by NERC. For the requested time period, the Sink Balancing	Response: P3T4 have been removed and is not a compliance template.

Authority shall provide the instances when dynamic schedule deviation exceeded the criteria in Requirement 5 and shall demonstrate that a revised E-Ttag was submitted.

Compliance Reset Period: One calendar year without a violation from the time of the violation.

Data retention requirements: Three months.

~~**Not Specified.**~~

Levels of Non Compliance

~~[P3T4]~~

Level 1 — One E-Ttag was not updated according to Requirement 5.

Level 2 — Two E-Ttags were not updated according to Requirement 5.

Level 3 — Three E-Ttags were not updated according to Requirement 5.

Level 4 — Four or more E-Ttags are not updated according to Requirement 5.~~Not Specified.~~

[Appendix 3A1 Section C] Attachment 013-1

~~Interchange Transaction Corrections~~

~~Transaction Corrections may be provided by PSE submitting the Tag to replace non-reliability data listed in a tag. As each correction is received, the Evaluation Time of the Transaction will extend, based on the following rules:~~

- ~~Each correction shall extend the evaluation time by ten minutes~~
- ~~At no time can the evaluation time be extended past the start time of the Transaction.~~
- ~~Each correction shall reset the approval status of those entities affected by the correction~~
- ~~The segment or segments corrected will be eligible for passive approval if the correction is received within the timelines specified below, except in the case where the Transaction has already been set for passive denial. The segment or segments corrected will be subject to passive denial if the correction is not received within the timelines specified below. At no point may a Transaction segment already under Passive Denial constraints be returned to Passive Approval eligibility.~~

~~Table 1: Correction Submission Requirements*~~

~~Eastern Interconnection~~	~~Western Interconnection~~
~~20 minutes prior to start~~	~~30 minutes prior to start~~
~~*Start time references are for start of the Transaction not the start of the ramp.~~	

Interchange Transaction Modifications

Curtailments, reloads, market-initiated modifications, and other Transaction modifications that affect energy profiles must be received by and evaluated within certain times. The following tables describe the submission and evaluation requirements for such changes.

Modification requests received by the deadlines specified below shall be considered "on time," and are eligible for Passive Approval. Modification requests received past the deadlines shall be considered "late," and are considered denied unless explicitly approved by all parties.

Table ~~2~~1: Eastern Interconnection — Modifications

Modification Type	Requestor Submission Deadline***	Actual Submission Time***	Evaluation Time
Reliability (Curtailments or Reloads)	20 minutes prior to modification start**	Less than 30 minutes to start	10 minutes
		30 minutes or more prior to start	15 minutes
Market — Committed Transmission Reservation(s) Reductions	N/A	N/A	N/A

Market — Committed Transmission Reservation(s) Increases, Energy Reductions, Energy Increases*	20 minutes prior to modification start**	Less than 30 minutes to start	10 minutes
		30 minutes or more prior to start	15 minutes
***Start time references are for start of the Transaction not the start of the ramp.			

Table ~~3~~2: Western Interconnection — Modifications

Modification Type	Requestor Submission Deadline***	Actual Submission Time***	Evaluation Time
Reliability (Curtailments or Reloads)	25 minutes prior to modification start**	Less than 30 minutes to start	10 minutes
		30 minutes or more prior to start	15 minutes
Market — Committed Transmission Reservation(s) Reductions	N/A	N/A	N/A
Market — Committed Transmission Reservation(s) Increases, Energy Reductions, Energy Increases*	25 minutes prior to modification start**	Less than 30 minutes to start	10 minutes
		30 minutes or more prior to start	15 minutes
***Start time references are for start of the Transaction not the start of the ramp.			

*See Special Exception for Cancellations below.
**If received after deadline, requires active approval or will be passively denied

Special Exception for Cancellations

A cancellation is defined as setting both committed transmission reservation(s) and energy flow to zero for the duration of the Transaction prior to the start of a Transaction but following that Transactions approval. In the event that a PSE submitting the tag elects to cancel a Transaction, the following timelines should be utilized:

Table ~~4~~3: Special Exception for Cancellations Submission and Evaluation Timing

Region	Submission Deadline*	Evaluation Time
Eastern Interconnection	15 minutes prior to transaction start	If received by deadline, no evaluation required. Request is automatically approved.
		If not received by deadline, request is not eligible for Special Exception for Cancellations, and must be processed normally.
Western Interconnection	20 minutes prior to transaction start	If received by deadline, no evaluation required. Request is automatically approved.
		If not by deadline, request is not eligible for Special Exception for Cancellations, and must be processed normally.
*Start time references are for start of the Transaction not the start of the ramp.		

Standard: 054

Title: Documentation and Review of Available Transfer Capability/Total Transfer Capability Methodologies and Calculations

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies.

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results.

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Purpose: To promote the consistent and uniform application of transmission transfer capability calculations among transmission system users, the Regional Reliability Organizations (RROs) shall develop methodologies for calculating Total Transfer Capability (TTC) and Available Transfer Capability (ATC) that comply with NERC definitions for Total Transfer Capability and Available Transfer Capability, the NERC Reliability Standards, and applicable Regional criteria. ~~Methodologies and resulting values shall be made available to all participants of the electricity market. (To ensure that methodologies and resulting values are available to all participants in the electricity market.)~~

Effective Date: February 8, 2005

The NERC definitions for TTC and ATC that are to be followed in the RRO methodologies are:

- The Total Transfer Capability (TTC) is the amount of electric power that can be moved or transferred reliably from one area to another area of the interconnected transmission systems by way of all transmission lines (or paths) between those areas under specified system conditions.

- Available Transfer Capability (ATC) is a measure of the transfer capability remaining in the physical transmission network for further commercial activity over and above already committed uses. It is defined as TTC less existing transmission commitments (including retail customer service), less a capacity benefit margin (CBM), less a transmission reliability margin (TRM). (The transfer capability margins — CBM and TRM — are defined under Reliability Standards 055 and 056.)

  ATC is expressed as:

  ATC = TTC – Existing Transmission Commitments (includes retail customer service) – CBM – TRM

  Depending on the methodology used, either ATC or TTC may be calculated first.

TTC and ATC values are projected values. They are intended to indicate the available transfer capabilities of the interconnected transmission network. The TTC and ATC methodologies and the resulting TTC and ATC values shall be made available to all participants in the electricity market.

Notes: 1) Cut down on the wordiness of this standard. The acronyms for Total Transfer Capability (TTC) and Available Transfer Capability (ATC) should be used throughout the standard after they have been introduced and defined. This practice would provide for a consistent format throughout the Reliability Standards document. A similar comment applies to the Regional Reliability Organization and its RRO acronym.

2) The definitions for ATC and TTC are part and parcel of this standard and its requirements and should be retained as part of the standard for which they were developed. Changes to these definitions will require the use of the NERC Standards Development Process. Compliance to these definitions is required by this standard and must be included herein.

Standard 054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

Requirements:

R1-1 Each Regional Reliability Organization, in conjunction with its members, shall develop and document a Regional Total Transfer Capability (TTC) and Available Transfer Capability (ATC) methodology that is compliant with the NERC definitions for TTC and ATC, the NERC Reliability Standards, and applicable Regional criteria. (Certain systems that are not required to post Available Transfer Capability values are exempt from this Standard.) The Regional Reliability Organization's ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ ATC methodology shall include each of the following nine items, and shall explain ~~its~~ their use in determining ~~Total Transfer Capability~~ TTC and ~~Available Transfer Capability~~ ATC values: (Note: The issues to be addressed should begin with an action verb as in the original standards. This passive approach should not be used.)

a) A narrative explaining how ~~Total Transfer Capability~~ TTC and ~~Available Transfer Capability~~ ATC values are determined.

b) An accounting for how the reservations and schedules for firm (non-recallable) and non-firm (recallable) transfers, both within and outside the Transmission Service Provider's system, are included.

c) An accounting for the ultimate points of power injection (sources) and power extraction (sinks) in ~~Total Transfer Capability~~ TTC and ~~Available Transfer Capability~~ ATC calculations.

d) A description of how incomplete or so-called partial path transmission reservations are addressed. (Incomplete or partial path transmission reservations are those for which all transmission reservations necessary to complete the transmission path from ultimate source to ultimate sink are not identifiable due to differing reservation priorities, durations, or that the reservations have not all been made.)

e) A requirement that ~~Total Transfer Capability~~ TTC and ~~Available Transfer Capability~~ ATC values and ~~posting~~ postings within the current week be determined at least once per day, that daily ~~Total Transfer Capability~~ TTC and ~~Available Transfer Capability~~ ATC values and postings for day 8 through the first month be determined at least once per week, and that monthly ~~Total Transfer Capability~~ TTC and ~~Available Transfer Capability~~ ATC values and postings for months 2 through 13 be determined at least once per month.

f) An ~~I~~indication ~~that~~ of the treatment and level of customer demands, including interruptible demands.

g) Specification of how system conditions, limiting facilities, contingencies, transmission reservations, energy schedules, and other data needed by ~~t~~Transmission Service ~~p~~Providers for the calculation of ~~Total Transfer Capability~~ TTC and ~~Available Transfer Capability~~ ATC values are shared and used within the ~~Region Reliability Organization~~ RRO and with neighboring interconnected electric systems, including adjacent systems, subregions, and ~~Regional Reliability Organizations~~ RROs. In addition, specify how this information is to be used to determine ~~Total Transfer Capability~~ TTC and ~~Available Transfer Capability~~ ATC values. If some data is not used, provide an explanation.

h) A description of how the assumptions for and the calculations of ~~Total Transfer Capability~~ TTC and ~~Available Transfer Capability~~ ATC values change over different time (such as hourly, daily, and monthly) horizons.

i) A description of the ~~Regional Reliability Organization~~RRO's practice on the netting of transmission reservations for purposes of ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC determination.

R1-2. The ~~Regional Reliability Organization~~RRO shall make the most recent version of the documentation of its ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC methodology available on a web site accessible by NERC, the ~~Regional Reliability Organization~~RROs, and the transmission users in the electricity market.

Measures:
M1-1. The ~~Regional Reliability Organization~~ RRO shall provide evidence that its most recent ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC methodology documentation meets Reliability Standard 054.1-R1-1.

M1-2 The ~~Regional Reliability Organization~~RRO shall provide evidence that its ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC methodology is available on a web site accessible by NERC, the ~~Regional Reliability Organization~~RROs, and the transmission users in the electricity market. (Redundant with R1-2.)

Regional Differences:
None identified.

Compliance Monitoring Process:

Timeframe:

The RRO's methodology development and completeness and its ~~Available~~ availability on a website accessible by NERC, the ~~Regional Reliability Organization~~RROs, and transmission users.

Compliance Monitoring Responsibility:

Compliance Monitor: ~~Unaffiliated Third Party~~NERC (or its designated entity).

Levels of Non-compliance:

Level 1: The ~~Regional Reliability Organization~~RRO's documented ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC methodology does not address one or two of the nine items required for documentation under Reliability Standard 054.1-R1-1.

Level 2: Not applicable.

Level 3: Not applicable.

Level 4: The ~~Regional Reliability Organization~~RRO's documented ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC methodology does not address three or more of the nine items required for documentation under Reliability Standard 054.1-R1-1 or the ~~Regional Reliability Organization~~RRO does not have a documented ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC methodology available on a web site in accordance with Reliability Standard 054.1-R1-2.

Standard 054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

Requirements:

R2-1. Each ~~Regional Reliability Organization~~RRO, in conjunction with its members, shall develop and implement a procedure to periodically review (at least annually) and ensure that the ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC calculations and resulting values of member Transmission Service Providers comply with the Regional ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC methodology, the NERC Reliability Standards, and applicable Regional criteria.

R2-2. Each ~~Regional Reliability Organization~~RRO shall document the results of its periodic reviews of the ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC calculations and resulting values.

R2-3. The ~~Regional Reliability Organization~~RRO shall provide the results of its most current reviews of ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC values to NERC on request (within 30 calendar days).

Measures:

M2-1. The ~~Regional Reliability Organization~~RRO's written procedure for the performance of periodic reviews of Regional ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC calculations and resulting values shall comply with Reliability Standard 054.2-R2-1.

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M2-2 The ~~Regional Reliability Organization~~RRO shall have evidence it provided documentation of the results of its periodic reviews of ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC calculations and resulting values to NERC within 30 calendar days.

Regional Differences:

None identified.

Compliance Monitoring Process:

Timeframe:

Procedure on Request (within 30 calendar days).
Documentation of results of periodic reviews provided to NERC on request (within 30 calendar days).

Compliance Monitoring Responsibility:

Compliance Monitor: ~~Unaffiliated Third Party~~NERC (or its designated entity).

Levels of Non-compliance:

Level 1: Not applicable.

Level 2: The ~~Regional Reliability Organization~~RRO did not perform a review of all Transmission Service Providers within its Region for consistency with ~~its~~the Regional ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC methodology on an annual basis.

Level 3: Not applicable.

Level 4: The ~~Regional Reliability Organization~~RRO does not have a procedure for performing a ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC methodology consistency review of all Transmission Service Providers within its ~~Regional Reliability Organization~~RRO, or has not performed any such reviews on an annual basis.

Standard 054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values

Requirements:

R3-1. Each ~~Regional Reliability Organization~~RRO, in conjunction with its members, shall develop and document a procedure on how transmission users can input their concerns or questions regarding the ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC methodology and values of the Transmission Service Provider(s), and how these concerns or questions will be addressed. The ~~Regional Reliability Organization~~RRO's procedure shall specify the following:

a) The name, telephone number and email address of a contact person to whom concerns are to be addressed.

b) The amount of time it will take for a response.

c) The manner in which the response will be communicated (e.g., email, letter, telephone, etc.)

d) What recourse a customer has if the response is deemed unsatisfactory.

R3-2. The ~~Regional Reliability Organization~~RRO shall post on a web site that is accessible by the ~~Regional Reliability Organization~~RROs, NERC, and the transmission users in the electricity market, its procedure which addresses receiving and addressing concerns about the ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC methodology and ~~Total Transfer Capability~~TTC and ~~Available Transfer Capability~~ATC values of member Transmission Service Providers.

Measures:

M3-1 The ~~Regional Reliability Organization~~RRO shall have evidence that its procedure for receiving and responding to concerns on ~~input for Available Transfer Capability~~ATC and ~~Total Transfer Capability~~TTC methodologies and values meets Reliability Standard 054.3-R3-1.

M3-2 The ~~Regional Reliability Organization~~RRO shall have evidence that its procedure for receiving input and addressing concerns on ~~for Available Transfer Capability~~ATC and ~~Total Transfer Capability~~TTC methodologies and values is available on a web site accessible by the ~~Regional Reliability Organization~~RROs, NERC, and transmission users.

Regional Differences:

None identified.

Compliance Monitoring Process:

Timeframe:

Procedure available on a web site accessible by the Regional Reliability Organizations, NERC, and transmission users.

Compliance Monitoring Responsibility:

Compliance Monitor: ~~Unaffiliated Third Party~~NERC (or its designated entity).

Levels of Non-compliance:

Level 1: Not applicable.

Level 2: The ~~Regional Reliability Organization~~RRO does not have a procedure available on an accessible web site, or the procedure does not incorporate all required elements of Reliability Standard 054.3-R3-1.

Level 3: Not applicable.

Level 4: The ~~Regional Reliability Organization~~ RRO has no procedure available.

Standard: 055

Title: Documentation and Review of Capacity Benefit Margin Methodologies and Calculations

055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies.

055.2 Procedure for Verifying Capacity Benefit Margin Calculations and Values.

055.3 Procedures for the Use of Capacity Benefit Margin Values.

055.4 Documentation of the Use of Capacity Benefit Margin.

Purpose: To promote the consistent and uniform application of transmission transfer capability margins ~~calculations~~ among transmission system users, ~~by~~ the Regional Reliability Organization (RRO) shall develop~~ing~~ methodologies for calculating Capacity Benefit Margin (CBM)~~. This methodology~~that shall comply with NERC definitions for Capacity Benefit Margin, the NERC Reliability Standards, and applicable Regional criteria. ~~Regional Capacity Benefit Margin methodologies and the resulting Capacity Benefit Margin values shall be available to all participants of the electricity market, in order to facilitate intra- and inter-Regional transactions.~~

Effective Date: February 8, 2005

The NERC definition for Capacity Benefit Margin (CBM) that is to be followed in these RRO methodologies for calculating CBM is:

- Capacity Benefit Margin (CBM) is the amount of firm transmission transfer capability preserved by the transmission provider for load-serving entities (LSEs), whose loads are located on that transmission provider's system, to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies.

The Regional Capacity Benefit Margin methodologies and the resulting Capacity Benefit Margin values shall be made available to all participants ~~of~~ in the electricity market~~, in order to facilitate intra- and inter-Regional transactions~~.

Notes: 1) To cut down on the wordiness in the standard, the acronyms for Capacity Benefit Margin (CBM) and Regional Reliability Organization (RRO) should be used throughout the standard after they have been introduced and defined.

2) The CBM definition is part and parcel of this standard and must be included herein.

Standard 055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies

Requirements:

R1-1. Each Regional Reliability Organization, in conjunction with its members, shall develop and document a Regional Capacity Benefit Margin methodology that is compliant with the NERC definition for CBM, the NERC Reliability Standards, and applicable Regional criteria. The Regional Reliability Organization's Capacity Benefit Margin methodology shall include each of the following ten items, and shall explain ~~its~~ their use in determining Capacity Benefit Margin value. Other items that are Regional Reliability Organization specific or that are considered in each respective Regional Reliability Organization methodology shall also be explained along with their use in determining Capacity Benefit Margin values.

a) Specify that the method used by each ~~Regional Organization~~RRO member to determine its generation reliability requirements as the basis for Capacity Benefit Margin shall be consistent with its generation planning criteria.

b) Specify the frequency of calculation of the generation reliability requirement and associated Capacity Benefit Margin values.

c) Require that generation unit outages considered in a Transmission Service Provider's Capacity Benefit Margin calculation be restricted to those units within the Transmission Service Provider's system.

d) Require that Capacity Benefit Margin be preserved only on the Transmission Service Provider's system where the Load-Serving Entity's load is located (i.e., Capacity Benefit Margin is an import quantity only).

e) Describe the inclusion or exclusion rationale for generation resources of each Load Serving Entity including those generation resources not directly connected to the ~~t~~Transmission Service ~~p~~Provider's system but serving ~~Load~~ Load-Serving Entity loads connected to the Transmission Service Provider's system.

f) Describe the inclusion or exclusion rationale for generation connected to the ~~t~~Transmission Service ~~p~~Provider's system but not obligated to serve native/network load connected to the Transmission Service Provider's system.

g) Describe the formal process and rationale for the Regional Reliability Organization to grant any variances to individual ~~t~~Transmission Service ~~p~~Providers from the Regional Reliability Organization's Capacity Benefit Margin methodology.

h) Specify the relationship of Capacity Benefit Margin to the generation reliability requirement and the allocation of the Capacity Benefit Margin values to the appropriate transmission facilities. The sum of the Capacity Benefit Margin values allocated to all interfaces shall not exceed that portion of the generation reliability requirement that is to be provided by outside resources.

i) Describe the inclusion or exclusion rationale for the loads of each ~~Load~~ Load-Serving Entity, including interruptible demands and buy-through contracts (type of service contract that offers the customer the option to be interrupted or to accept a higher rate for service under certain conditions).

j) Describe the inclusion or exclusion rationale for generation reserve sharing arrangements in the Capacity Benefit Margin values.

R1-2. The Regional Reliability Organization shall make the most recent version of the documentation of its Capacity Benefit Margin methodology available on a web site accessible by NERC, the Regional Reliability Organizations, and the transmission users in the electricity market.

Measures:

M1-1. The Regional Reliability Organization~~'s~~ shall provide evidence that its most recent Capacity Benefit Margin methodology documentation ~~shall meet~~ meets Reliability Standard 055.1-R1-1.

M1-2 The Regional Reliability Organization's Capacity Benefit Margin methodology shall be available on a web site accessible by NERC, the Regional Reliability Organizations, and the transmission users in the electricity market. (Redundant with R1.2.)

Regional Differences:

None identified.

Compliance Monitoring Process:

Timeframe:

The RRO's CBM methodology and its completeness, and its ~~Available~~ availability on a website accessible by NERC, the Regional Reliability Organizations, and transmission users.

Compliance Monitoring Responsibility:

Compliance Monitor: ~~Unaffiliated Third Party~~NERC (or its designated entity).

Levels of Non-compliance:

Level 1: The Regional Reliability Organization's documented Capacity Benefit Margin methodology does not address one or two of the ten items required for documentation under Reliability Standard 055.1-R1-1.

Level 2: Not applicable.

Level 3: Not applicable.

Level 4: The Regional Reliability Organization's documented Capacity Benefit Margin methodology does not address three or more of the ten items required for documentation under Reliability Standard 055.1-R1-1, or the Regional Reliability Organization does not have a documented Capacity Benefit Margin methodology available on a web site in accordance with Reliability Standard 055.1-R1-2.

Standard 055.2 Procedure for Verifying Capacity Benefit Margin Calculations and Values

Requirements:

R2-1. Each Regional Reliability Organization, in conjunction with its members, shall develop and implement a procedure to periodically review (at least annually) the Capacity Benefit Margin calculations and the resulting values of member Transmission Service Providers to ensure that they comply with the Regional Reliability Organization's Capacity Benefit Margin methodology. The Regional procedure shall include the following four requirements:

a) Indicate the frequency under which the verification review shall be implemented.

b) Require review of the process by which Capacity Benefit Margin values are updated, and their frequency of update, to ensure that the most current Capacity Benefit Margin values are available to transmission users.

c) Require review of the consistency of the Transmission Service Provider's Capacity Benefit Margin components with its published planning criteria. A Capacity Benefit Margin value is considered consistent with published planning criteria if the components that comprise Capacity Benefit Margin are addressed in the planning criteria. The methodology used to determine and apply Capacity Benefit Margin does not have to involve the same mechanics as the planning process, but the same uncertainties must be considered and any simplifying assumptions explained. It is recognized that Available Transfer Capability determinations are often time constrained and thus will not permit the use of the same mechanics employed in the more rigorous planning process.

d) Require Capacity Benefit Margin values to be periodically updated (at least annually) and available to the Regional Reliability Organizations, NERC, and transmission users in the electricity markets.

R2-2. Each Regional Reliability Organization shall document ~~the results of its periodic~~ its Capacity Benefit Margin review ~~s~~procedure and shall make the ~~results~~ procedure available to NERC on request (within 30 calendar days).

R2-3 The Regional Reliability Organization shall provide documentation of the results of the most current implementation of its Capacity Benefit Margin procedure to NERC on request (within 30 calendar days).

Measures:

M2-1. The Regional Reliability Organization's written procedure for the performance of periodic reviews of Regional Capacity Benefit Margin calculations shall comply with Reliability Standards 055.2-R2-1 and 055.2-R2-2.

M2-2 The Regional Reliability Organization shall have documentation of the results of its ~~periodic reviews of Capacity Benefit Margin calculations, in accordance with Reliability Standard 055.2-R2-2 and R2-3~~most current implementation of its CBM review procedure and shall make these results available in accordance with Reliability Standard 055.2-R2-3.

~~M2-3 The Regional Reliability Organization shall have evidence it provided documentation of its Capacity Benefit Margin procedure and the results of the most current implementation of the~~

~~procedure to NERC as requested (within 30 calendar days).~~

Regional Differences:
None identified.

Compliance Monitoring Process:

Timeframe:

The documentation of the Regional Reliability Organization's Capacity Benefit Margin procedure shall be available to NERC on request (within 30 calendar days). Documentation of the results of the most current implementation of the procedure shall be available to NERC on request (within 30 calendar days).

Compliance Monitoring Responsibility:

Compliance Monitor: NERC (or its designated entity)~~Unaffiliated Third Party~~.

Levels of Non-compliance:

Level 1: Not applicable.

Level 2: The Regional Reliability Organization did not perform a review of all Transmission Service Providers within its Regional Reliability Organization for consistency with the Regional Reliability Organization's Capacity Benefit Margin methodology on an annual basis.

Level 3: Not applicable.

Level 4: The Regional Reliability Organization does not have a procedure for performing a Capacity Benefit Margin methodology consistency review of all Transmission Service Providers within its Regional Reliability Organization, or has not performed any such reviews on an annual basis.

Standard 055.3 Procedures for the Use of Capacity Benefit Margin Values

Requirements:

R3-1. Each Transmission Service Provider shall document ~~a~~ its procedure on the use of Capacity Benefit Margin (scheduling of energy against a Capacity Benefit Margin preservation), which procedure shall include the following three components:

a) Require that Capacity Benefit Margin is to be used only after the following steps have been taken (as time permits): all non-firm sales have been terminated, direct-control load management has been implemented, and customer interruptible demands have been interrupted. Capacity Benefit Margin may be used to reestablish operating reserves.

b) Require that Capacity Benefit Margin shall only be used if the Load Serving Entity calling for its use is experiencing a generation deficiency and its Transmission Service Provider is also experiencing transmission constraints relative to imports of energy on its transmission system.

c) Describe the conditions under which Capacity Benefit Margin may be available as non-firm transmission service.

R3-2. Each Transmission Service Provider shall make ~~their~~ its Capacity Benefit Margin use procedure available on a web site accessible by the Regional Reliability Organizations, NERC, and the transmission users in the electricity market.

Measures:

M3-1 The Transmission Service Provider's procedure for the use of Capacity Benefit Margin (scheduling of energy against a Capacity Benefit Margin preservation) shall meet Reliability Standard 055.3-R3-1.

M3-2 The Transmission Service Provider's procedure for the use of Capacity Benefit Margin (scheduling of energy against a Capacity Benefit Margin preservation) shall be available on a web site accessible by the Regional Reliability Organizations, NERC, and the transmission users in the electricity market.

Regional Differences:

None identified.

Compliance Monitoring Process:

Timeframe:

~~Each Regional Reliability Organization shall report compliance and violations to NERC via the NERC Compliance Reporting process.~~Documentation and availability of each Transmission Service Provider's procedures on the use of CBM.

Compliance Monitoring Responsibility:

Compliance Monitor: Planning Authority (Regional Reliability Organizations or other designated entities).

Levels of Non-compliance:

Level 1: The Transmission Service Provider's Capacity Benefit Margin use procedure is available and addresses only two of the three requirements for such documentation as listed ~~above~~ under Reliability Standard 055.3-R3-1.

Level 2: Not applicable.

Level 3: Not applicable.

Level 4: The Transmission Service Provider's Capacity Benefit Margin use procedure addresses one or none of the three requirements as listed ~~above~~ under Reliability Standard 055.3-R3-1, or is not available.

Standard 055.4 Documentation of the Use of Capacity Benefit Margin

Requirements:

R4-1. Each Transmission Service Provider that uses Capacity Benefit Margin shall report (to the Regional Reliability Organization, NERC and the transmission users) the use of Capacity Benefit Margin by the ~~Load~~ Load-Serving Entities' loads on its system, except for Capacity Benefit Margin sales as non-firm transmission service. ~~(The~~ This use of Capacity Benefit Margin shall be consistent with the Transmission Service Provider's Capacity Benefit Margin use procedure~~.s.)~~

R4-2. The Transmission Service Provider shall post the following three items within 15 calendar days after the use of Capacity Benefit Margin for emergency purposes~~,~~. This posting shall be on a web site accessible by the Regional Reliability Organizations, NERC, and the transmission users in the electricity market.

a) Circumstances for its use.

b) Duration of use.

c) Amount of Capacity Benefit Margin used.

Measures:

M4-1. The Transmission Service Provider shall have evidence it posted an after-the-fact disclosure that energy was scheduled against a Capacity Benefit Margin preservation (for purposes other than non-firm transmission sales) on a website accessible by the Regional Reliability Organizations, NERC, and the transmission users in the electricity market.

M4-2 If the Transmission Service Provider had energy scheduled against a Capacity Benefit Margin preservation (for purposes other than non-firm transmission sales) the Transmission Service Provider shall have evidence it posted an after-the-fact disclosure that includes the elements required by Reliability Standard 055.4-R4-2.

Regional Differences:

None identified.

Compliance Monitoring Process:

Timeframe:

After the fact disclosure (~~W~~within 15 calendar days) of the use of Capacity Benefit Margin (excluding non-firm sales~~.~~).

Compliance Monitoring Responsibility:

Compliance Monitor: Planning Authority (Regional Reliability Organizations or other designated entities).

Levels of Non-compliance:

Level 1: Not applicable.

Level 2: Information pertaining to the use of Capacity Benefit Margin during an energy emergency was provided, but was not made available on a web site accessible by the Regional Reliability Organizations, NERC, and transmission users in the electricity market, or meets only two of the three requirements as listed in Reliability Standard 055.4-R4-2.

Level 3: Not applicable.

Level 4: After the use of Capacity Benefit Margin (excluding non-firm sales), information pertaining to the use of Capacity Benefit Margin was provided but meets one or none of the three requirements as listed above under Reliability Standard 055.4-R2, or no information was provided.

Standard: 056

Title: Documentation and Review of Transmission Reliability Margin Methodologies and Calculations

056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology.

056.2 Procedure for Verifying Transmission Reliability Margin Values.

Purpose: To promote the consistent application of transmission transfer capability margins ~~calculations~~ among Transmission System Providers and Transmission Owners, each Regional Reliability Organization (RRO) shall ~~by~~ develop~~ing~~ methodologies for calculating Transmission Reliability Margins~~. This methodology~~ that shall comply with the NERC definition~~s~~ for Transmission Reliability Margin, the NERC Reliability Standards, and applicable Regional criteria. ~~Regional Transmission Reliability Margin methodologies and the resulting Transmission Reliability Margin values shall be available to all participants of the electricity market, in order to facilitate intra- and inter-regional transmission service.~~

Effective Date: February 8, 2005

The NERC definition for Transmission Reliability Margin (TRM) that is to be followed in the RRO methodologies for calculating TRM is:

- Transmission Reliability Margin (TRM) is the amount of transmission transfer capability necessary to provide reasonable assurance that the interconnected transmission network will be secure. TRM accounts for the inherent uncertainty in system conditions and the need for operating flexibility to ensure reliable system operation as system conditions change.

The Regional Transmission Reliability Margin methodologies and the resulting Transmission Reliability Margin values shall be made available to all participants ~~of~~ in the electricity market~~, in order to facilitate intra- and inter-regional transmission service~~.

Notes: 1) To cut down on the wordiness in the standard, the acronyms for Transmission Reliability Margin (TRM) and Regional Reliability Organization (RRO) should be used throughout the standard after these terms have been introduced and defined.
2) The TRM definition is part and parcel of this standard and must be included herein.

Standard 056.1 Documentation and Content Of Each Regional Transmission Reliability Margin Methodology

Requirements:

R1-1. Each Regional Reliability Organization, in conjunction with its members, shall develop and document a Regional Transmission Reliability Margin methodology that is compliant with the NERC definition for TRM, the NERC Reliability Standards, and applicable Regional criteria. The Region's Transmission Reliability Margin methodology shall specify or describe each of the following five items, and shall explain ~~its~~ their use, if any, in determining Transmission Reliability Margin values. Other items that are Regional specific or that are considered in each respective Regional methodology shall also be explained along with their use in determining Transmission Reliability Margin values.

a) Specify the update frequency of Transmission Reliability Margin calculations.

b) Specify how Transmission Reliability Margin values are incorporated into Available Transfer Capability calculations.

c) Specify the uncertainties accounted for in Transmission Reliability Margin and the methods used to determine their impacts on the Transmission Reliability Margin values. The following components of uncertainty, if applied, shall be accounted for solely in Transmission Reliability Margin and not Capacity Benefit Margin:
   - Aggregate load forecast error (not included in determining generation reliability requirements), and load distribution error,
   - Variations in facility loadings due to balancing of generation within a control area,
   - Forecast uncertainty in transmission system topology,
   - Allowances for parallel path (loop flow) impacts,
   - Allowances for simultaneous path interactions,
   - Variations in generation dispatch, and
   - Short-term operator response (operating reserve actions not exceeding a 59-minute window).

   Any additional components of uncertainty shall benefit the interconnected transmission systems, as a whole, before they shall be permitted to be included in Transmission Reliability Margin calculations.

d) Describe the conditions, if any, under which Transmission Reliability Margin may be available to the market as non-firm transmission service.

e) Describe the formal process for the Regional Reliability Organization to grant any variances to individual Transmission Service Providers from the Regional Transmission Reliability Margin methodology.

R1-2 The Regional Reliability Organization shall make its most recent version of the documentation of its Transmission Reliability Margin methodology available on a web site accessible by NERC, the Regional Reliability Organizations, and the transmission users in the electricity market.

Measures:

M1-~~1~~2. The Regional Reliability Organization's most recent version of the documentation of its Transmission Reliability Margin methodology is available on a website accessible by NERC, the Regional Reliability Organizations, and the transmission users in the electricity market.

M1-~~2~~1. The Regional Reliability Organization's most recent version of the documentation of its Transmission Reliability Margin contains all items in Reliability Standard 056.1-R1-1.

Regional Differences:
None identified

Compliance Monitoring Process:

Timeframe:

Each Regional Reliability Organization shall report compliance and violations to NERC via the NERC Compliance Reporting process.

Compliance Monitoring Responsibility:

Compliance Monitor: ~~Unaffiliated Third Party~~NERC (or its designated entity).

Levels of Non-compliance:

Level 1: The Regional Reliability Organization's documented Transmission Reliability Margin methodology does not address one of the five items required for documentation under Reliability Standard 056.1-R1-1.

Level 2: Not applicable.

Level 3: Not applicable.

Level 4: The Regional Reliability Organization's documented Transmission Reliability Margin methodology does not address two or more of the five items required for documentation under Reliability Standard 056.1-R1-1, or the ~~.~~

~~**Or**~~

~~The~~ Regional Reliability Organization does not have a documented Transmission Reliability Margin methodology.

Standard 056.2 Procedure for Verifying Transmission Reliability Margin Values

Requirements:

R2-1. Each Regional Reliability Organization, in conjunction with its members, shall develop and implement a procedure to review Transmission Reliability Margin calculations and resulting values of member Transmission Service Providers to ensure they comply with the Regional Transmission Reliability Margin methodology, and are periodically updated and available to transmission users.

This procedure shall include the following four required elements:

a) Indicate the frequency under which the verification review shall be implemented.

b) Require review of the process by which Transmission Reliability Margin values are updated, and their frequency of update, to ensure that the most current Transmission Reliability Margin values are available to transmission users.

c) Require review of the consistency of the Transmission Service Provider's Transmission Reliability Margin components with its published planning criteria. A Transmission Reliability Margin value is considered consistent with published planning criteria if the same components that comprise Transmission Reliability Margin are also addressed in the planning criteria. The methodology used to determine and apply Transmission Reliability Margin does not have to involve the same mechanics as the planning process, but the same uncertainties must be considered and any simplifying assumption explained. It is recognized that Available Transfer Capability determinations are often time constrained and thus will not permit the use of the same mechanics employed in the more rigorous planning process.

d) Require Transmission Reliability Margin values to be periodically updated (at least prior to each season — winter, spring, summer, and fall), as necessary, and made available to the Regional Reliability Organizations, NERC, and transmission users in the electricity market.

R2-2. The Regional Reliability Organization shall make documentation of its Regional Transmission Reliability Margin review procedure available to NERC on request (within 30 calendar days).

R2-3. The Regional Reliability Organization shall make documentation of the results of the most current implementation of its Transmission Reliability Margin review procedure available to NERC on request (within 30 calendar days).

Measures:

M2-1. The Regional Reliability Organization shall have evidence it provided to NERC upon request (within 30 calendar days) a copy of ~~the~~ its written procedure developed ~~for the performance of periodic reviews of Regional Transmission Reliability Margin calculations~~to review the TRM calculations and resulting TRM values of member Transmission Service Providers.

M2-2. The Regional Reliability Organization shall have evidence it provided to NERC on request (within 30 calendar days) documentation of the results of the most current implementation of ~~the~~ its review procedure.

Regional Differences:
None identified.

Compliance Monitoring Process:

Timeframe:

Each Regional Reliability Organization shall report compliance and violations to NERC via the NERC Compliance Reporting process.

Compliance Monitoring Responsibility:

Compliance Monitor: ~~Unaffiliated Third Party~~NERC (or its designated entity).

Levels of Non-compliance:

Level 1: Not applicable.

Level 2: The Regional Reliability Organization did not perform a review of all Transmission Service Providers within its Regional Reliability Organization for consistency with ~~its~~ the Regional Transmission Reliability Margin methodology on an annual basis.

Level 3: Not applicable.

Level 4: The Regional Reliability Organization does not have a procedure for performing a Transmission Reliability Margin methodology consistency review of all Transmission Service Providers within its Region, or has not performed any such reviews on an annual basis.

Standard: 057

Title: Requirements for the Installation and Reporting of Disturbance Monitoring Equipment

057.1 Define and Document Disturbance Monitoring Equipment Requirements.

Purpose: Recorded information about transmission system faults or disturbances is essential to determine the performance of system components and to analyze the nature and cause of a disturbance. This standard is intended ~~T~~to ensure that disturbance monitoring equipment is installed in a uniform manner throughout a Region to determine system performance, facilitate ~~development of models and~~ analyses of disturbance events~~.~~ and their causes, and assist in the development of system models.

Effective Date: February 8, 2005

Standard 057.1 Define and Document Disturbance Monitoring Equipment Requirements

Requirements:

R1-1 The Regional Reliability Organization shall develop comprehensive requirements for the installation of disturbance monitoring equipment to ensure data is available to determine system performance and the causes of system disturbances. The comprehensive requirements shall include all of the following:

a) Type of data recording capability (e.g., sequence-of-event, fault recording, dynamic disturbance recording).

b) Equipment characteristics including but not limited to:
   - Recording duration requirements.
   - Time synchronization requirements.
   - Data format requirements.
   - Event triggering requirements.

c) Monitoring, recording, and reporting capabilities of the equipment
   - Voltage.
   - Current.
   - Frequency.
   - MW and/or MVAR, as appropriate.

d) Data retention capabilities (e.g., length of time data is to be available for retrieval).

e) Regional coverage requirements (e.g., by voltage, geographic area, electric area or subarea).

f) Installation requirements:
   - Substations.
   - Transmission lines.
   - Generators.

g) Responsibility and requirements for maintenance and testing.

h) Documentation Requirements: Requirements for periodic (at least every five years) updating, review, and approval of the Regional requirements.

R1-2. The Regional Reliability Organization shall provide its requirements for the installation of disturbance monitoring equipment to other Regional Reliability Organizations and NERC on request (30 calendar days).

Measures:

M1-1. The Regional Reliability Organization's requirements for the installation of disturbance monitoring equipment shall address all elements listed in Standard 057.1-R1-1

M1-2. The Regional Reliability Organization shall have evidence it provided its requirements for the installation of disturbance monitoring equipment to other Regional Reliability Organizations and NERC on request (30 calendar days).

Regional Differences:
None identified.

Compliance Monitoring Process:

Timeframe:

On request by Regional Reliability Organizations and/or NERC (30 calendar days.)

Compliance Monitoring Responsibility:

Compliance Monitor: ~~Unaffiliated Third Party~~NERC (or its designated entity).

Levels of Non-compliance:

Level 1: The Regional Reliability Organization's disturbance monitoring requirements do not address one of the eight requirements contained in Reliability Standard 057.1-R1-1.

Level 2: The Regional Reliability Organization's disturbance monitoring requirements do not address two of the eight requirements contained in Reliability Standard 057.1-R1-1.

Level 3: The Regional Reliability Organization's disturbance monitoring requirements do not address three of the eight requirements contained in Reliability Standard 057.1-R1-1.

Level 4: The Regional Reliability Organization's disturbance monitoring requirements ~~were not provided or~~ do not address four or more of the eight requirements contained in Reliability Standard 057.1-R1-1, or were not provided.

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Draft 2 of Proposed Version 0 Reliability Standards – RC v. RA

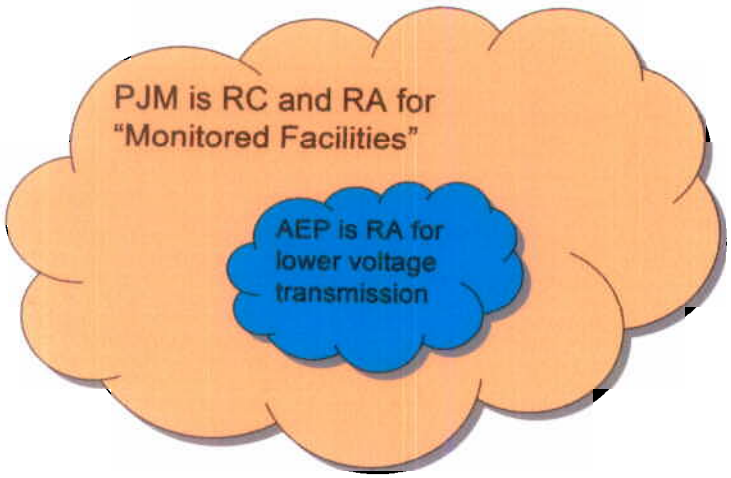
This issue has received a large amount of visibility in the last few weeks as comments are due October 15, 2004. I am writing this memo to express my concerns this issue has raised in the industry. Various groups and individuals have taken sides on this issue and the drafting team will receive conflicting comments. In studying the issue, I can answer Question 1. on the comment form both to agree with the change to include both RC and RA and to disagree with this change. Following are some of the factors which cause this conflict and why I can argue both sides of this issue.

1. Problems with definitions: The Reliability Authority ensures the real-time reliability of the interconnected bulk electric transmission systems within a Reliability Authority Area. Bulk electric transmission system is defined as "The aggregate of electric generating plants, transmission lines, and related equipment. The term may refer to those facilities within one electric utility, or within a group of utilities in which the transmission lines are interconnected." This definition does not give any voltage class distinction which in my mind would include all transmission 60 kV and above. This is where the problem occurs. **Who is** the RA for 69, 115, 138 and 230 kV interconnection transmission lines? In many instances, the RC or RC as a function of a RTO only monitors the EHV bulk electric transmission system.
2. Can an RC be the RA of the lower voltage transmission system if they do not have visibility of the system? Does the RC have procedures to deal with overloads of these lower voltage transmission lines? In many cases, these are referred to as "local procedures". Over loads of these lines may or may not lead to cascading of the EHV system, but could result in large amounts of customer load being disrupted. Is localized load shed considered a Reliability issue?
3. Under the definition of a Reliability Authority, which entities can register as a RA? Are there approved qualifications in order to register as a RA?
4. In numerous discussions that I have had internally at AEP, in the NERC subcommittees and within the SPP, I have commented that an RC can be a RA but that does not mean that a RA is a RC. Let me give an example of my thought process: PJM is the contracted RC for AEP's East transmission system both before and after our recent integration into the PJM RTO. PJM has functional control of these transmission facilities as the RTO. PJM only monitors "Monitored Facilities." which includes all of the EHV network and selected 138 kV facilities. AEP is responsible for the reliability of the lower voltage

transmission system. AEP has operating procedures to deal with overloads of these facilities. In this case, PJM is responsible and has authority of the reliability of the EHV network and those facilities known to impact that network. PJM does not have the tools or procedures to address the problems on the lower voltage transmission facilities which are part of the definition of "Bulk electric transmission system". Therefore I can surmise that PJM is both a RC and RA, while AEP is a RA for the lower voltage transmission facilities within its footprint. Please see the diagram below.

5. The NERC Transmission Subcommittee agreed that Version 0 should include both RC and RA because it helps clear up this issue. I agree with this conclusion. The SPP Operating Reliability Working Group (ORWG), which I chair, concluded that RC should not be included because Version 0 only deals with the Function Model. I can agree with this as well. The problem arises when groups such as the NERC RCWG and ORS state that only RCs can register as RAs.
6. AEP performs many of the tasks assigned to the RA in the functional model. These include:
    a. Enforce Operational reliability requirements
    b. Monitor all reliability-related parameters within AEP's transmission system
    c. Perform reliability analysis (actual and contingency) for the AEP transmission system
    d. Identify, communicate and direct actions to relieve reliability threats and limit violations in the AEP transmission area
    e. Direct implementation of emergency procedures
    f. Direct and coordinate System Restoration

Since AEP performs some but not all of the RA tasks, should AEP register as a RA?



Solution I.

The Functional Model describes the function "Operating Reliability." The definition is, "Ensures the real-time operating reliability of the interconnected bulk electric transmission systems within a Reliability Authority Area." There is one Responsible Entity – Reliability Authority. To solve this debacle, maybe there should be two Responsible Entities, the RC and the RA. I believe that this problem could be resolved if the definition of RC was limited to the EHV bulk electric transmission system for which an IROL can be calculated (to protect from instability and cascading outages). The RC would have responsibility within the Reliability Coordination Area. A RA is a subset of the RC and is responsible and answers to the RC. The RA monitors the lower voltage transmission system not monitored by the RC. The RC should have a defined list of monitored facilities. This list can be changed based on the topology of the system and responsiveness of the facilities to electrical flows in the Interconnect.

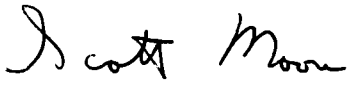
Although this may appear to have over-lapping authority it is in line with the "Defense in Depth" concept. Multiple pair of eyes should be monitoring the system and backing each other up.

Solution II.

The definition of the RA can be defined as, "Ensures the real time-time operating reliability of the interconnect EHV bulk electric transmission system within a Reliability Authority Area. The tasks of the Transmission Operator could be expanded to include the items I identified in 6.a-f. above. NERC would need to add the definition for EHV Bulk Electric Transmission System as a subset of Bulk Electric System which operates at 230 kV or above.

Solution III.

Solution III is a transition solution similar to other Function Model issues with Version 0 (removal of Interchange Authority). In this case, RA should be removed from Version 0 and the term RC used instead. This best describes the current practice until Organizational Certification issues can be resolved and any modifications to the Functional Model are made.



Scott P. Moore

October 1, 2004

IMO Position Paper on
"Reliability Authority Vs Reliability Coordinator Role - Version Zero Reliability Standards"

The IMO appreciates the efforts of the Standards Drafting Team for their work in the development of draft 2 of Version Zero within the stipulated short time period. Never-the-less, we must submit that having two entities with a reliability designation with overlapping roles and authorities is not acceptable as it introduces significant confusion and jeopardizes the reliability of the Interconnection(s).

Position

It is the IMO's position that:

(1) The Version Zero Reliability Standards should identify only one functional entity with a "Reliability" designation.
(2) The functional entity designated with "Reliability" must be the entity with the highest level of authority that will act in the interests of reliability for the overall Reliability Coordinator Area and the Interconnection
(3) The Version Zero Reliability Standards should retain the current designation of Reliability Coordinator in recognition of industry concerns over the application of the term Reliability Authority to this functional entity at this time.
(4) The existing "Reliability Co-ordinators " as designated by the Regions in their respective Reliability Plans should be registered as the Version Zero Reliability Coordinators.

Rationale

The Plan for Accelerating the Adoption of NERC Reliability Standards included in the Version Zero identifies two key reasons for the expeditious translation of the existing NERC reliability policies into Version Zero reliability standards. The reasons indicated are:

(1) NERC must "demonstrate that its reliability standards are unambiguous", and
(2) There is a need "to make these standards clear and enforceable."

With these two key points in mind, the inclusion of two functional entities with a reliability designation represents a failure of Version Zero to clarify roles and authorities and poses a risk to the reliability of the interconnected system for the following reasons:

- Draft 2 of the Version Zero Standards, incorporates the designations of Reliability Authority and Reliability Coordinator in the same standard set. This creates confusion with respect to the performance of various operational tasks and, perhaps most significantly, the identification of the reliability entity with the highest level of authority.

- Based on the August 2003 blackout recommendations, a number of reliability related advancements and clarifications have been made in the recently revised NERC operating

policies 5, 6 and 9 to ensure improved reliability of the Interconnection (e.g. by identifying one functional entity whose purpose is to "act in the interest of reliability for the Reliability Coordinator Area and its Interconnection"). These policies focus on the Reliability Coordinator and the required interaction with all other operating entities. Designating two entities with the term "Reliability" with similar or overlapping authorities would greatly diminish these approved advances.

- The IMO recognizes that the Standard Drafting Team "heard inputs from a minority of its members indicating that limiting the reliability entity to comprise only the existing Reliability Coordinators would violate existing organizational structures and agreements"[1]. Specifically mentioned were that some Reliability Coordinators do not perform all the tasks identified in Policy 9 at this time and that the NERC reliability rules could not force an entity within a local jurisdiction to cede operational authority to a entity outside of that jurisdiction.

  However the IMO reminds the industry that Version Zero is a transitional step to the complete implementation of the Reliability Functional Model, not the implementation of the Functional Model. The IMO believes that the specific provisions that are of concern are a direct translation of existing Policy and Standards Templates that were correctly carried forward to Version Zero in Draft 1. Specific to these policies and their translation into standards was the ability of the Reliability Coordinator to delegate tasks (Policy 9 section B 2.0 and Version Zero Standard 33 R4) and the ability of other operating entities to address Reliability Coordinator directives where such actions would violate "safety, equipment, or regulatory or statutory requirements" (Policy 9 Section A 3.0 and Version Zero Standard 33 R8). As a result, the IMO believes that the concerns identified will be adequately addressed if the translation to Version Zero proceeds with reference to only the Reliability Coordinator.

Conclusions and Next Steps:

During the balloting phase of Version Zero, the IMO intends to vote in acceptance of the Version Zero Standards only upon a suitable resolution to the above-mentioned concerns and recommendations.

Once again, we believe that the designation of the Reliability Coordinator only would result in a reliable transition of Version Zero Standards.

Paul Murphy
Chief Operating Officer

[1] NERC Request to Register Entities Responsible for Implementing Version Zero Dated September 27, 2004

COMMENT FORM
Draft 2 of Proposed Version 0 Reliability Standards

This form is to be used to submit comments on Draft 2 of the Version 0 Reliability Standards. Comments must be submitted by **October 15, 2004**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Version 0 Comments" in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Roger Champagne**	
Organization:	**Hydro-Québec TransÉnergie**	
Telephone:	**514-289-2211, ext. 2766**	
Email:	**champagne.roger.2@hydro.qc.ca**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☒	1 - Transmission Owners
	☐	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

This questionnaire is divided into three sections:

A – Operating Standards (Questions 1–4)

B – Planning Standard (Questions 5–7)

C – General Issues Applying to Operating and Planning (Questions 8–13)

SECTION A – OPERATING STANDARDS

Question 1: Reliability Coordinator v. Reliability Authority

In the Draft 1 posting of the Version 0 reliability standards, the Drafting Team assigned all Reliability Coordinator requirements to Reliability Authorities to be as consistent as possible with the Functional Model. Comments received in the first posting were generally favorable toward this approach.

However, the Drafting Team was concerned with minority comments that the current Reliability Coordinator duties did not align with the functional model responsibilities of a Reliability Authority. In particular, not all Reliability Coordinators currently have the authorities and responsibilities defined in the Functional Model for Reliability Authorities. Also, some entities who are currently Control Areas may wish to register as Reliability Authorities.

The Drafting Team has determined that the Version 0 reliability standards will be be less confusing to industry and less disruptive to the compliance monitoring program if all NERC operating policy requirements currently assigned to Reliability Coordinators remain assigned to Reliability Coordinators in Version 0. The Drafting Team has therefore changed Reliability Authority back to Reliability Coordinator in Standards 033 to 040 and in a few other requirements that apply to Reliability Coordinators in several other standards. **Do you agree with this change?**

☒ Agree.

☐ Disagree.

Comments

The Version 0 Draft 2 Reliabilty Standards should only designate ONE functional entity as being the highest level of authority, responsible for the "Reliability" of the BES. Hydro-Québec TransÉnergie (HQTÉ) strongly suggests the designation used should be the "Reliability Coordinator" to reflect a direct translation of Policy 9. Although HQTÉ believes that RC is preferable for use in Version 0, we acknowledge the opinion expressed in the ORS/RCWG Letter and if utilization of the Reliability Authority, (RA) is preferred by industry we will support RA however we will continue to maintain only one Reliability designation should be associated with the Version 0 standards as having the highest authority-ultimate responsibility. The Operating Authorities as shown in the existing policies should be properly mapped to either RC, TO or BA as applicable to remove the RA designation.

The functional entity designated with "Reliability" must be the entity with the highest level of authority (ultimate responsibility for) that will act in the interests of reliability for the overall Reliability Coordinator Area "wide area" and the Interconnection

Other sub-entities within a contiguous RC Area may have reliability roles that are specific to a local Area and reportable to the RC. These sub-entities should not have a "Reliability" designation in their title, to avoid confusion during this transitional phase to the Functional Model.

HQTÉ strongly suggests the existing "Reliability Coordinators ", as designated by the Regions in their respective Reliability Plans, should be the only entities allowed to register as the Version Zero reliability entity, RC.

Any requirements assigned to a Reliability Authority should be divided among the other functional model entities i.e. TO, BA, RC.

HQTÉ would also like to remind the drafting team that the NERC BOT has stated that the Version 0 Standards must be FULLY implementable along with the associated industry full compliance in February 2005. Full implementation of the Functional Model and designating two entities as having the highest level of authority, as indicated in the posted Glossary, will not only lead to confusion but also not be clearly implementable with clearly defined responsibilities.

HQTÉ also notes that the Version 0 standards effort should provide valuable input to the review and update of the FM and ultimate full implementation and urges NERC to make this a top priority. The comments submitted to the existing Version 2 BOT approved FM should be evaluated immediately, revisions made, and the FM Version 3 drafted for approval. This, along with the Version 0 Standards, should be NERC's top priority as all the Version 1 Standards will utilize the FM designations.

HQTÉ believes that this response is full aligned with, and fully supports the more detailed position paper presented by The IMO on the RC/RA issue.

Question 2: Reliability Authority v. Transmission Operator

Comments on the first draft of the Version 0 reliability standards indicated general satisfaction with the identification of functions. The Drafting Team has reviewed specific comments and made corrections as appropriate.

By changing Reliability Authority back to Reliability Coordinator where applicable, there are significantly fewer references to Reliability Authority in the Version 0 standards. When translating the terms Operating Authority or Control Area from current operating policies, it is usually clear from the context if the standard applies to a balancing function (i.e. Balancing Authority) or transmission function. However, the nuance of applying the transmission responsibilities to the Transmission Operator or Reliability Authority is not always clear from current operating policies. The Drafting Team has made a best effort of implementing both the Transmission Operator and Reliability Authority.

Should Version 0 reliability standards retain both the Transmission Operator and Reliability Authority, or should Version 0 adopt the Transmission Operator for now and leave implementation of the Reliability Authority for future versions of the standards and after clarification of the responsibilities of the Reliability Coordinator and Reliability Authority in the Functional Model?

☐ Retain both Transmission Operator and Reliability Authority as shown in Version 0 Draft 2.

☒ Apply all transmission system responsibilities in Version 0 to the Transmission Operator and defer implementation of Reliability Authority until a future version.

Comments

See comments in Question 1 above. As per our position stated in Q1 above, the RA requirements may be reassigned to either Transmission Operator, Balancing Authority or applicable entities, as appropriate or previously identified in version 1.

Question 3: Dynamic Scheduling Requirement

In order to correct a deficiency in current operating policy, the Drafting Team proposes an alternative requirement (Requirement 5 of Standards 013) defining when dynamic schedule tags have to be modified. Alternative A is a translation of existing policy. Alternative B is a proposal of the Drafting Team to correct this deficiency in current policy. **Which alternative do you prefer for adoption in Version 0?**

DYMAMIC SCHEDULING TAG REVISION — ALTERNATIVE A: CURRENT POLICY

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours if at any time the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25% .

DYNAMIC SCHEDULING TAG REVISION — ALTERNATIVE B: NEW PROPOSAL

R5 The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occur:

R5.1 The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±10%.

R5.2 The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ±25 megawatt-hours.

R5.3 A Reliability Coordinator, Reliability Authority, or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

☐ Alternative A – translate existing policy and correct any deficiency in a future version.

☒ Alternative B – Correct the deficiency in the dynamic schedule tagging requirement in Version 0.

Comments

Alternative B is the preferred approach and its application shall result in positive impacts on reliability, however HQTÉ believes that this might be beyond the scope of the drafting team and results in more than a translation. HQTÉ further suggests that if this represents an impediment to the approval of the Version 0 Standards then Alternative A would be acceptable. This other alternative would allow the work done to date by the Interchange Subcommittee, IS, to develop into a Version 1 SAR/Standard.

Question 4: Guides

The Drafting Team received comments in the first posting that valuable information was omitted from the Version 0 draft standards, notably some guides. Although the Drafting Team is instructed not to include voluntary guides in the standards, the Drafting Team has proposed in Draft 2 to incorporate several guides in the form of a flexible outline that "shall be considered". Two examples include elements to be considered when developing a restoration plan (Attachment 027-1) and elements to be considered in developing a training program for operating personnel (Attachment 031-1).

Do you agree with including these attachments to the Version 0 standards along with "shall be considered" requirements?

☐ Agree with including these guides as an attachment to the standard.

☒ Disagree with including these guides in Version 0.

Comments

HQTÉ feels this suggestion is outside of the scope of what the Version 0 Drafting Team was charged to do. The Operating Policies were to be a direct translation and there were to be no requirements added as a result of this translation. We support retaining these as "guides," for the present and recommend their ultimate consideration and incorporation into the Version 1 standard.

SECTION B – PLANNING STANDARDS

Question 5: Consideration of Incomplete Phase III and Phase IV Planning Standards

In response to the first draft of Version 0, there was not a strong industry consensus to keep or delete the Phase III and Phase IV Planning Standards that have not been field tested, or refined as a result of field testing. Of the 83 sets of comments received, 22 indicated that inclusion of these 'incomplete' Phase III and Phase IV planning standards would be 'show stoppers' that would prevent their approval of Version 0.

Based on the comments received, the Drafting Team recommends that all of the 'incomplete' Phase III and Phase IV planning standards be removed from Version 0 and be entered into the full standards development process as either regular SARs or Urgent Action SARs as appropriate. In making this recommendation, the SDT considered the following:

- The Standards Authorization Committee cautioned the SDT to refrain from including requirements that cannot be implemented by industry when adopted by the NERC Board of Trustees on February 8, 2005. Approving standards that cannot be implemented dilutes the value of the set of standards being held up as a set of industry standards that is designed collectively to protect reliability.
- The translation process being used in developing Version 0 does not allow for modifications to existing requirements and measures – so the many comments already submitted in response to the field testing of Phase III Planning Standards cannot be utilized in developing Version 0. Even if the scope allowed changes, the accelerated schedule of Version 0 does not allow sufficient time to fix Phase III and Phase IV planning standards considering the industry input and consensus required. These comments indicate the existing Phase III standards should be modified before being implemented.

Some of the standards in the 'incomplete' Phase III and Phase IV relate to recommendations coming out of the August 14, 2003, blackout investigation. The Drafting Team recommends these standards be immediately reviewed by the Planning Standards Task Force, and any standards needed to support the NERC blackout recommendations (e.g., Voltage Control and Reactive Power, Disturbance Monitoring, Undervoltage Load Shedding, System Blackstart Capability) should be entered into the standards development process as **Urgent Action SAR**s separate from Version 0.

On this basis, the following standards were dropped in entirety from Draft 2 Version 0 standards:

- 059 (was II.B. System Modeling Data – Generation Equipment M1 to M6)
- 062 (was II.E. Load Models for System Dynamics Studies M1 to M3)
- 064 (was I.D. Voltage Support and Reactive Power M1 and M2)
- 065 (was IIIC. Generator Control and Protection M1 to M12)
- 066 (was III.B. Transmission System Control Devices M1 to M3)
- 071 (was IVB. Automatic Restoration of Load M1 to M4)

The following standards have the noted sections removed in Draft 2, but retain one or more sections:

- 057 dropped sections 2, 3, 4, and 5 (was I.F. System Adequacy and Security – Disturbance Monitoring Measures 2-5)
- 061 dropped sections 2 and 3 (was II.D. System Modeling Data – Actual and Forecast Demands M2 and M3)
- 068 dropped sections 1, 2, and 5 (was III.E. System Protection and Control – Under Voltage Load Shed M1, M2, and M5)
- 070 dropped sections 2 and 3 (was IV.A. System Restoration – System Blackstart Capability M2 and M3)

Do you agree with dropping the above listed standards and sections from Version 0 on the basis that the standards are incomplete, not validated through field testing, or not refined after deficiencies were noted in field testing?

☒ Agree with dropping these planning standards from Version 0.

☐ Do not agree with dropping these planning standards from Version 0.

Comments

HQTÉ agree with the decision of the Version 0 Drafting team to remove these from the Version 0 Draft 2 package. Furthermore, HQTÉ reiterates its position that these standards have not gone through the entire field testing –revision process or the pilot program. Comments submitted were not addressed nor is there a schedule to do so. These standards should now be subject to the full "ANSI approved" NERC Reliability Standards Development Process.

HQTÉ also would recommend that those Phase III and IV Standards that are related to Blackout Recommendation could be developed by NERC in an expeditious manner such as the Urgent Action process.

Question 6: ATC/CBM/TRM as Possible Business Practices

Several commenters to the first draft indicated that some of the measures associated with ATC, CBM and TRM address business practices and others indicated these measures are needed for reliability reasons. In respect of these comments, the Drafting Team is seeking broader inputs from industry on the question of whether these proposed standards should be developed as Version 0 reliability standards or forwarded to the Joint Interface Committee (JIC) with a recommendation that the standards be developed as business practices. Pending such a determination, the Drafting Team continues to include these standards in Draft 2 and made improvements in consideration of inputs received in the first posting.

Standard 054 includes the following sections:

054.1 Documentation of Total Transfer Capability and Available Transfer Capability Calculation Methodologies

054.2 Review of Transmission Service Provider Total Transfer Capability and Available Transfer Capability Calculations and Results

054.3 Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.

Should any portion of Standard 054 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments

HQTÉ believes in Standard 54 all the references to ATC should be removed and referred to NAESB and the Standard's requirements as it pertains to TTC should be retained. TTC is a reliability issue and is a value that insures the system is operated in a safe and reliable manner. TTC Standards should be retained to ensure everyone follows a minimum requirement. The other components, CBM, ATC, and TRM define how the Market will be managed to ensure the TTC is not violated.

Standard 055 includes the following sections:
055.1 Documentation of Regional Reliability Organization Capacity Benefit Margin Methodologies
055.2 Procedure for Verifying Capacity Benefit Margin Values
055.3 Procedures for the Use of Capacity Benefit Margin Values
055.4 Documentation of the Use of Capacity Benefit Margin

Should any portion of Standard 055 be a NAESB business practice? If yes, which section(s)?

☒ Yes. ☐ No.

Comments
HQTÉ believe that the 55.1, 55.2, 55.3, and 55.4 should be forwarded to NAESB for development into a business standard. The Capacity Benefit Margin is a commercial issue.

Standard 056 includes the following sections:
056.1 Documentation and Content of Each Regional Transmission Reliability Margin Methodology
056.2 Procedure for Verifying Transmission Reliability Margin Values

Should any portion of Standard 056 be a NAESB business practice? If yes, which section(s)?

☐ Yes. ☒ No.

Comments
HQTÉ believe Standard 56 should be retained in the Version 0 Standard set as the TRM is utilized in the development of operating limits.

Question 7: Distribution Provider Added to 060 Facility Ratings

The Distribution Provider was added to the list of entities that must comply with Standard 060 (Facility Ratings). **Do you agree with this addition?**

☐ Yes.

☒ No.

Comments
It appears that the question being posed is incorrect. There is no mention of "Distribution Provider" in standard -060 (Facility Ratings).

SECTION C – GENERAL QUESTIONS FOR OPERATIONS AND PLANNING

Question 8: Glossary of Terms

The Drafting Team has prepared an initial draft of a Glossary of Terms Used in Reliability Standards. The Drafting Team is continuing to refine the glossary and plans to include the glossary as part of the Version 0 standards when they are submitted for approval. **In the spaces below, indicate any terms that should be removed from or added to the glossary, or revised. Please explain the reason for the change.**

Term	Change	Justification
RA	☒ Delete ☐ Add ☐ Modify	**HQTÉ feels that only RC should appear in these Version 0 standards)**
BES	☐ Delete ☐ Add ☒ Modify	**The definition of BES as posted in the Glossary is too broad-based and all encompassing. See suggestion in Question 11-**
RC	☐ Delete ☐ Add ☒ Modify	**Definition of the RC should be identical to that which appears in Policy 9.**
RA Area	☐ Delete ☐ Add ☒ Modify	**This term should be modified to reflect the RC Area**
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	
	☐ Delete ☐ Add ☐ Modify	

Question 9: Standards Numbering Scheme

The Drafting Team proposes to adopt a new numbering scheme for Version 0 that would also apply to future versions of standards, including those currently in development. The scheme essentially would use a 3-letter acronym followed by a standard number and a version number. For example, Version 0 Standard 001 would become BAL-1-0, where BAL is the general area of Balancing, 1 is the standard number, and 0 is the version number. The Version 1 standards currently in development would also use this scheme. For example current proposed Version 1 standard 304 – Frequency Bias Settings could replace the equivalent Version 0 standard and become BAL-3-1.

Please refer to the posted draft of the numbering scheme for a full set of proposed standards numbers.

Do you agree with changing to the proposed new numbering scheme in Version 0 (prior to the next posting for ballot) or do you prefer to keep the numbering scheme as used in Version 0 Draft 2 and address standards numbering later?

☐ Agree with changing to new numbering scheme prior to balloting Version 0 standards.

☒ Prefer to retain the current numbering of Version 0 standards and address standards numbering at a future time after Version 0 is approved.

Comments

HQTÉ believe that the proposed numbering, although it may be sufficient to satisfy all the future needs, should not be applied at this time. There is opportunity to group and rename/renumber the standards after they are approved by the BOT.

Question 10: Straw Poll on Version 0 Standards

Recognizing the Draft 2 Version 0 Standards are still draft and subject to further improvement based on public comments, if you were asked today to consider voting to approve the Version 0 Standards (in single block vote) as presented in Draft 2, how do you think you would vote?

☐ Would approve the standards as presented.

☐ Would approve the standards conditioned on certain improvements being made.

☒ Would not approve the standards.

☐ Would abstain.

Comments

HQTÉ would vote not to approve the Version 0 Draft 2 Standards based on the "showstoppers" listed in Question 11.

Question 11:

Are there any “show stoppers” in the Draft 2 Version 0 standards that would prevent you from approving the standards? If so, what are they?

Comments
Ranked in order of importance;

1) RC-RA Issue and Functional Model- HQTÉ believe there should be only one highest level of authority and strongly recommends the Version 0 drafting team adopt the accurate translation of only the RC and its mapping into the Version 0 Standards. Introduction of the RA along with the RC adds confusion. For the purposes of Registration, HQTÉ agrees with the NERC RCWG and ORS that only existing RCs as designated by their respective Regional Reliability Plans should register as the highest level of authority. For more specifics please refer to our comments outlined in Question 1 above.

2) Bulk Electric System Definition as listed in the posted Glossary is too broad for consideration and potentially could include everything regardless of how critical it may be to preventing a cascading blackout. HQTÉ encourage a performance based definition or at least the adoption of similar language that presently appears in the NERC Planning Standards Document which states; "The NERC Planning Standards, Measurements, and Guides in this report are intended to apply primarily to the bulk electric systems, also referred to as the interconnected transmission systems or networks. Because of the individual character of each of the Regions, it is recommended that each Region define those facilities that are to be included as its bulk electric systems or interconnected transmission systems for which application of the Planning Standards will be required. Any differences from the following Board definition of bulk electric system shall be documented and reported to the NERC Engineering Committee prior to the application or implementation of the Planning Standards in this report."
HQTÉ could support the posted Version 0 BES definition only if it is prefaced by a statement similar to the above that the Regions may define what constitues their BES.

3) HQTÉ agree with the Version 0 drafting team's decision to remove the non-blackout related Phase III and Phase IV Planning Standards from the Version 0 Standards. If they are reintroduced, HQTÉ will be unable to recommend support for the Version 0 Standards. The Phase III and IV Blackout related standards can be developed by NERC in an expeditious manner within the process if they are proven necessary to ensuring the reliability of the BES. The remaining Phase III and IV Standards may go through the NERC RS Process on an "as needed" normal timeframe.

Question 12:

Please provide any additional comments you have regarding the Draft 2 Version 0 Reliability Standards.

Regarding Standard 29-Policy 7
-HQTÉ recommend changing R1 to;
Each Reliability Authority, Transmission Operator, Balancing Authority, Transmission Owner, Generator Owner, Generator Operator and Load Serving Entity shall provide adequate and reliable telecommunications facilities internally and with others for the exchange of Interconnection and operating information necessary to maintain reliability. Where applicable, these facilities shall be redundant and diversely routed.
-and changing R2 – R5 from
"Each Reliability Authority, Transmission Operator, and Balancing Authority shall" To
"Each Reliability Authority, Transmission Operator, Balancing Authority, Transmission Owner, Generator Owner, Generator Operator and Load Serving Entity shall"
-Remove R6 and attachment 029-1 should be removed. Those procedures apply to NERCnet users, which is a small subset of community that R1 – R5 apply to. Also, these procedures are the steps for obtaining and using NERCnet. Those procedures should not be part of a Reliability Standard.

In many standards, the Compliance Monitoring Responsibility/role has been assigned to "Compliance Monitor" referred as "Unaffiliated Third Party". This role needs to be clarified and terminology be defined in the Version 0 glossary.

Version 0 Translations need additional work to address the initial requirement of ensuring that they are clear, well defined and measurable. Significant comments would need to be incorporated to meet this criteria. see our specific comments in other questions. We still maintain that the deletion of the "S" statements in the Planning Standards translation has resulted, in a few cases, the weakening of the Standard. HQTÉ suggest reinstating the language in the Purpose Statement.

In many cases still the references to few of existing policies are not mapped correctly within the new version 0 requirements. (we are facilitating NERC SDT in this matter by identifying such inconsistencies or needs of references). The specifics are mentioned in Q13 below.

A list of specific deficiencies and/or inconsistencies are outlined under the Q13-Table below. We are facilitating NERC SDT in this matter by identifying issues and presenting the associated resolutions. It is expected that our noted/listed concerns (re: under Q13 below) shall be addressed and corresponding improvements in version 0 reliability standards shall be made.

There is a lack of a clear and consistent compliance process. While the standards and requirements are mentioned in all standards, yet in many of the standards the associated Measures, Compliance Monitoring Process and Levels of Non Compliance are missing or not specified. For the purposes of effective implementation/enforcement of these standards, we recommended that the associated measures, compliance monitoring process and levels of non compliance should also be (a) simultaneously mapped/specified where these exist already and (b) specifed/addressed in the very near future, where these do not exist today for consistency.

There still appear to be a few duplications or redundancy of requirements. There is a need to improvement to reduce these redundancies and better group the requirements.
As an example a few standards that show duplications are identified below:
(i) Standard 007 Requirement 5 and Standard 021 Requirement
(ii) Standard 008 Requirement and Standard 021 Requirement

In few standards the levels of non-compliance have not been translated/mapped correctly. As an example, in standard 028 levels of non-compliance have been incorrectly mapped from P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility). (re: more examples: std 028, 025, 027, 031) In general, lack of consistency for the compliance monitoring components is a problem. Some of the standards have compliance levels defined and some do not. There should be consistency.

ATC/CBM related planning standards contain business related issues and should be forwarded to the NAESB as noted in Question 6.

HQTÉ suggest that NERC revisit the Functional Model BOT approved Version 2 and address the comments submitted by industry during its posting to revise it and develop a Version 3. This should be undertaken immediately.

Question 13: Comments on Specific Version 0 Standards

Please comment on any specific proposed Version 0 Standards for which you have a concern. In doing so, please recognize that the Drafting Team is limited in scope to translating existing reliability rules and identifying functions and business practices. Please focus your comments on technical errors, incorrect function assignment or incorrect translation of the standard.

Please use multiple forms if more spaces are needed to provide comments. You may also continue comments from one row to the next in the table below – simply repeat the standard, section, and requirement numbers.

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number 1.0	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
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	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
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Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
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	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number 0.0	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
51.0	☒ R ☐ M Number 1.0	**R1-1 Says "…the interconnected transmission system is planned such…" but deleted the existing term "designed and constructed". We believe that the drafting team should keep all the terms and their inclusion in all 4 - 051 standards. Also, make sure that in the definition of the BES a reference to" the interconnected transmission system" as synonymous to BES since the standards applies to BES which is not mentionned in the text. In M1-2-delete "none identified" at the end of the measure.**
53.0	☒ R ☐ M Number 1.0	**R1-1,Requires Transmission Owners to have and document facility connection requirement for Generation, Transmission and End-user facilities to ensure compliance with NERC, Regional standards, as well as power pool criteria…. The term "power pool" should be eliminated and replaced with appropriate FM term.**
	☐ R ☐ M Number	
61.7	☒ R ☐ M Number 2.1	**"… load management to Reliability Coordinators and Transmission Operator(s) on request ..." shall be read instead of "…load management to system operators and security center coordinators on request ..." to be consistent with the standard.**
63.2	☒ R ☐ M Number 2.1	**It is suggested to add "facilities" after "…that owns protection system(s)…." In R2-1 and R2-2.** **R2-1 and R2-2 define requirements for transmission, generation owners and Distribution providers, while Standard 053.1 refers to transmission, generation and End-use facilities. 053.2 goes on to infer End-use facilities are owned by Distribution providers and Load Serving Entities (LSE). But 063.2 excludes LSEs. Suggest the same entities be used consistently throughout.**

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
72.0	☐ R ☐ M Number	**Compliance Monitoring Process-The basic goal of reporting vegetation contact is to more quickly identify the proximity of growing vegetation to critical transmission, and the threat posed, and to further identify possible trends suggesting poor vegetation management on the part of a given TO. HQTÉ agrees with NPCC Task Force on Coordination of Operation that the above exceptions permitted in the current standard contradict the very intent of the vegetation reporting program-continued-**
	☐ R ☐ M Number	**and considerably weaken the effort.** **Such exceptions must not be permitted if the initiative is to succeed.**
54.0	☐ R ☐ M Number	**There is no reference to standard 51 table I for the calculation of TTC as was stated in Planning standards I.E.S1/S2**
	☐ R ☐ M Number	
	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	
	☐ R ☐ M Number	

Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
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Standard # e.g. 013 or 051.2	Requirement or Measure # e.g. 1 or 3.2	Comments
	☐ R ☐ M Number	
	☐ R ☐ M Number	
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