April 15, 2011

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Re: *North American Electric Reliability Corporation,*
Docket No. *RM11-___-000*

Dear Ms. Bose:

The North American Electric Reliability Corporation ("NERC") hereby submits this petition in accordance with Section 215(d)(1) of the Federal Power Act ("FPA") and Part 39.5 of the Federal Energy Regulatory Commission's ("FERC") regulations seeking approval of an interpretation to Requirement R10 of TOP-002-2a — Normal Operations Planning[1] as set forth in **Exhibit A** to this petition. Upon FERC-approval, the standard that includes the interpretation will be referred to as TOP-002-2b. For ease of reference, the interpretation will be referred to as TOP-002-2b in this filing.

The interpretation was approved by the NERC Board of Trustees on November 4, 2010. NERC requests this interpretation be made effective immediately upon approval by FERC.

[1] TOP-002-2a currently has a FERC-approved interpretation to Requirement R 11 that is appended to the Reliability Standard and designated as TOP-002-2a. Upon the Commission's approval of the interpretation to Requirement R10 proposed in this filing, NERC will refer to the standard as TOP-002-2b.

NERC's petition consists of the following:

- This transmittal letter;
- A table of contents for the filing;
- A narrative description explaining how the interpretation meets the reliability goal of the standard;
- Interpretation of Requirement R10 of TOP-002-2a — Normal Operations Planning, (**Exhibit A**);
- Reliability Standard TOP-002-2b — Normal Operations Planning, that includes the appended interpretation of Requirement R10 (**Exhibit B**);
- Stakeholder comments received and an explanation of how those comments were considered for the interpretation of Requirement R10 of TOP-002-2a (**Exhibit C**);
- The complete development record of the interpretation (**Exhibit D**); and
- A roster of the interpretation drafting team **(Exhibit E**).

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Willie L. Phillips
Willie L. Phillips
Attorney for North American Electric Reliability Corporation

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION	**)** **)**	**Docket No. RM11-_-000**

PETITION OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION FOR APPROVAL OF AN INTERPRETATION TO REQUIREMENT R10 OF RELIABILITY STANDARD TOP-002-2a— NORMAL OPERATIONS PLANNING

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April 15, 2011

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I. INTRODUCTION

The North American Electric Reliability Corporation ("NERC")[2] hereby requests the Federal Energy Regulatory Commission ("FERC" or "Commission") to approve, in accordance with Section 215(d)(1) of the Federal Power Act ("FPA")[3] and Section 39.5 of FERC's Regulations, 18 C.F.R. § 39.5, a proposed interpretation of FERC approved Reliability Standard TOP-002-2a — Normal Operations Planning, Requirement R10. Upon FERC approval, NERC will refer to the Reliability Standard as TOP-002-2b — Normal Operations Planning.

NERC's interpretation process does not allow for modifications to the language contained in a Reliability Standard or in a requirement within a Reliability Standard through a request for an interpretation. A valid interpretation request is one that requests additional clarity about one or more requirements in a regulatory-approved Reliability Standard and does not request approval as to how to comply with one or more requirements in a regulatory-approved Reliability Standard. A valid interpretation in response to a request for interpretation provides additional clarity about one or more requirements within a Reliability Standard, but does not expand on the Reliability Standard or any requirement within the Reliability Standard.

The NERC Board of Trustees approved the interpretation to Requirement R10 of TOP-002-2a on November 4, 2010. NERC requests that the Commission approve Reliability Standard TOP-002-2b that includes the appended interpretation for

[2] NERC was certified by FERC as the electric reliability organization ("ERO") authorized by Section 215 of the Federal Power Act. FERC certified NERC as the ERO in its order issued July 20, 2006 in Docket No. RR06-1-000 *Order Certifying North American Electric Reliability Corporation as the Electric Reliability Organization and Ordering Compliance Filing*, 116 FERC ¶ 61,062 (2006) ("ERO Certification Order").
[3] 16 U.S.C. 824o.

Requirement R10 and make the standard effective immediately upon approval in accordance with FERC's procedures. **Exhibit A** to this filing sets forth the interpretation. **Exhibit B** contains the re-designated TOP-002-2b Reliability Standard that includes the appended interpretation. **Exhibit C** contains the drafting team's consideration of industry comments on the Interpretation of Requirement R10 of TOP-002-2a. **Exhibit D** contains the complete development record of the proposed interpretation of Requirement R10 to TOP-001-2a — Normal Operations Planning. **Exhibit E** contains a roster of the interpretation drafting team.

NERC is also filing this interpretation with applicable governmental authorities in Canada.

II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the following:

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*Persons to be included on FERC's service list are indicated with an asterisk. NERC requests waiver of FERC's rules and regulations to permit the inclusion of more than two people on the service list.

III. BACKGROUND

a. Regulatory Framework

By enacting the Energy Policy Act of 2005,[4] Congress entrusted FERC with the duties of approving and enforcing rules to ensure the reliability of the Nation's bulk power system, and with the duties of certifying an electric reliability organization ("ERO") that would be charged with developing and enforcing mandatory Reliability Standards, subject to FERC approval. Section 215 states that all users, owners and operators of the bulk power system in the United States will be subject to FERC-approved Reliability Standards.

b. Basis for Approval of Proposed Reliability Standard

While this interpretation does not represent a new or modified Reliability Standard, it does provide clarity with regard to the intent of the Reliability Standard. In this regard, NERC requests that the Commission approve this interpretation.

c. Reliability Standards Development Procedure and Interpretation

All persons who are directly or materially affected by the reliability of the North American bulk power system are permitted to request an interpretation of a Reliability Standard, as discussed in NERC's *Standard Processes Manual*, which is incorporated into the NERC Rules of Procedure as Appendix 3A. [5]

Upon request, NERC will assemble a team with the relevant expertise to address the interpretation request. The interpretation drafting team is then required to draft a

[4] Energy Policy Act of 2005, Pub. L. No. 109-58, Title XII, Subtitle A, 119 Stat. 594, 941 (2005) (codified at 16 U.S.C. § 824o).

[5] NERC notes that FERC approved the new *Standard Processes Manual* on September 3, 2010 (FERC Docket No. RR10-12-000), which replaces the *Reliability Standards Development Procedure Version 7* in its entirety. NERC developed the interpretation in accordance with the *Reliability Standards Development Procedure Version 7* until the *Standards Processes Manual* was approved on September 3, 2010, at which time that procedure was used to complete development of the interpretation.

response to the request for interpretation and then present the interpretation response for industry ballot within 45 days. If approved by the ballot pool and the NERC Board of Trustees, the interpretation is appended to the Reliability Standard and filed for approval by FERC and applicable governmental authorities in Canada to be made effective when approved. When the affected Reliability Standard is next substantively revised, the interpretation will then be incorporated into the Reliability Standard as appropriate.

The NERC Standards Committee appointed the interpretation drafting team to draft the response to the request for interpretation of Requirement R10 of TOP-002-2a. The interpretation drafted by the interpretation drafting team is included as **Exhibit A** to this petition. The proposed interpretation included as Exhibit A to this petition was approved by industry stakeholders with a 93.44% weighed-sector vote on October 16, 2010, and subsequently approved by the NERC Board of Trustees on November 4, 2010.

IV. INTERPRETATION OF RELIABILITY STANDARD TOP-002-2A — NORMAL OPERATIONS PLANNING

In Section IV (a), below, NERC summarizes the interpretation of Requirement R10 of TOP-002-2a — Normal Operations Planning and explains the development of the interpretation. Section IV (b), below, describes the stakeholder ballot results and provides an explanation of how stakeholder comments were considered and addressed by the interpretation drafting team assembled to develop the interpretation. **Exhibit C** contains stakeholder comments received during the balloting and an explanation of how those comments were considered. The development record for the interpretation, set forth in **Exhibit D**, includes the request for the interpretation, the response to the request for the interpretation, and the ballot pool and the final ballot results by registered ballot body

members. **Exhibit E** contains a roster of the team members who developed the proposed interpretation.

a. Justification for Approval of Interpretation

On October 15, 2009, the Florida Municipal Power Pool ("FMPP") requested an interpretation of Requirement R10 of TOP-002-2a. Requirement R10 of TOP-002-2a states:

> **R10.** Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).

Specifically, FMPP sought clarification with respect to whether the Balancing Authority must plan to maintain load-interchange-generation balance under the direction of the Transmission Operators to meet SOLs and IROLs:

> **Question**:
>
> *In Requirement R10, is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs?*

The interpretation drafting team was provided the following guidelines for developing a response to a request for interpretation:

> With a clear understanding of the standard's purpose and the technical engineering approach that best serves reliability, the team must judge whether the standard as written can be interpreted consistent with these interests using the following principles:
>
> a. The interpretation cannot change the requirement or standard. That is, the interpretation cannot expand the scope of the requirement beyond the language in the requirement.
> b. The interpretation must address the question posed or the team must explain why it cannot address the question.
> c. The interpretation drafting team has full latitude to respond to a question using requirements in other reliability

standards that were not identified specifically in the request if that information addresses the issue.

d. The interpretation itself must add clarity and not be ambiguous or subject to interpretation.

e. The interpretation should address the intent of the requirement and be in the best interest of reliability.

The interpretation of the requirement, which if implemented by the applicable entities, will provide for a reliable bulk power system, in a manner consistent with good utility practice and the public interest. These principles and application guideline intend that the interpretation will not lower the current level of compliance to the requirement by the applicable entities.[6]

In response to FMPP's interpretation request, the interpretation drafting team developed, and the industry stakeholders approved, the following interpretation:

Response:

Yes. As stated in the NERC *Glossary of Terms used in Reliability Standards*, the Balancing Authority is responsible for integrating resource plans ahead of time, maintaining load-interchange-generation balance within a Balancing Authority Area, and supporting Interconnection frequency in real time. The Balancing Authority does not possess the Bulk Electric System information necessary to manage transmission flows (MW, MVAR or Ampere) or voltage. Therefore, the Balancing Authority must follow the directions of the Transmission Operator to meet all SOLs and IROLs.

The interpretation is consistent with the stated purpose of the Reliability Standard, which is to ensure that current operation plans and procedures are prepared for reliable operations, including responses for unplanned events. The interpretation clarifies the planning responsibilities of Balancing Authorities by referencing the NERC *Glossary of Terms used in Reliability Standards*,[7] which provides that a Balancing Authority is "the responsible entity that integrates resource plans ahead of time, maintains load-

[6] These guidelines were in force at the time the interpretation proposed for approval was developed.
[7] *Glossary of Terms Used in NERC Reliability Standards,* available at*:* http://www.nerc.com/files/Glossary_of_Terms_2011Mar15.pdf.

interchange-generation balance within a Balancing Authority Area, and supports Interconnection frequency in real time." The NERC *Glossary of Terms used in Reliability Standards* also provides that a Transmission Operator is "[t]he entity responsible for the reliability of its 'local' transmission system, and that operates or directs the operations of the transmission facilities."

Therefore, the Transmission Operator is responsible for the real-time operation of the transmission assets under its purview, and as such has the authority to issue reliability-related directives to entities within its Transmission Operator area. Because the Balancing Authority does not possess the information necessary to manage transmission flows (MW, MVAR or Ampere) or voltage, the Balancing Authority must receive direction from the Transmission Operator and the Reliability Coordinator. Balancing Authorities must comply with reliability-related directives received from the Transmission Operator or the Reliability Coordinator regarding load, generation and interchange for transmission concerns.

In accordance with NERC Reliability Standards, the Balancing Authority is required to meet all control performance and disturbance recovery criteria for any system condition, and is required to maintain load-interchange-generation balance within its Balancing Authority Area while performing mitigation actions for exceeding IROL or SOL, or during routine operations where no transmission facilities are at risk. If the Balancing Authorities' actions do not resolve the targeted transmission issues, then the Transmission Operator or Reliability Coordinator is responsible for directing alternative actions.

b. Summary of the Reliability Standard Development Proceedings

NERC posted the interpretation response for pre-ballot review on January 11, 2010. The initial ballot was conducted from February 10, 2010, through February 22, 2010, and achieved a quorum of 84.98 percent, with a weighted affirmative approval of 90.82 percent. Because there were negative votes included with comments, the results from the initial ballot were not final.

There were seven total comments received – three comments associated with affirmative votes and four comments associated with negative votes.[8] The interpretation drafting team met via conference call to review and address all comments. Based on this review, the drafting team adopted two suggestions to make clarifying edits to the interpretation. The drafting team also provided an explanation in response to one commenter that did not result in any changes to the interpretation. Two commenters also provided similar recommendations for how the interpretation process might be generally improved. Finally, two voting entities made comments that suggested changes that were outside the scope of the NERC Interpretation Process.

A summary of comments and responses was posted on the NERC website for comment. No comments were received. A recirculation ballot for the revised interpretation was held from October 6, 2010, through October 16, 2010. The recirculation ballot and achieved a quorum of 91.21 percent and an approval of 93.44 percent.

[8] *See* Exhibit C.

c. Future Action

NERC's *2011-2013 Reliability Standards Development Plan* includes Project 2007-03 (Real-time Transmission Operations).[9] The drafting team for Project 2007-03 has already been appointed and has begun work to revise the following Reliability Standards:

- TOP-001-1 — Reliability Responsibilities and Authorities
- TOP-002-2 — Normal Operations Planning
- TOP-003-0 — Planned Outage Coordination
- TOP-004-1 — Transmission Operations
- TOP-005-1 — Operational Reliability Information
- TOP-006-1 — Monitoring System Conditions
- TOP-007-0 — Reporting Sol and IROL Violations
- TOP-008-0 — Response to Transmission Violations
- PER-001-0 — Operating Personnel Responsibility and Authority

In August of 2010, the drafting team for Project 2007-03 presented a draft TOP-002-3 — Operations Planning Reliability Standard to industry stakeholders for comment. The current draft of the TOP-002-3 standard provides even greater clarity regarding the distinction between tasks performed by the Transmission Operator and the tasks performed by the Balancing Authority. The current draft of the TOP-002-3 standard is anticipated to be presented to the NERC Board of Trustees and the Commission for approval in 2011.

[9] *2011-2013 Reliability Standards Development Plan*, available at: http://www.nerc.com/files/2011-2013_RS-Development-Plan_Revised_Rev_00_2011-03-2-BOT_approved_0310201_rev7.pdf.

V. CONCLUSION

NERC respectfully requests that the Commission approve the proposed interpretation to Reliability Standard TOP-002-2a — Normal Operations Planning, as set forth in **Exhibit B**, in accordance with Section 215(d)(1) of the FPA and Part 39.5 of FERC's regulations. NERC requests that this interpretation be made effective immediately upon issuance of FERC's order in this proceeding.

Respectfully submitted,

/s/ Willie L. Phillips

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 15th day of April, 2011.

/s/ Willie L. Phillips
Willie L. Phillips
Attorney for North American Electric Reliability Corporation

Exhibit A

Interpretation of Reliability Standard TOP-002-2a — Normal Operations Planning, Requirement R10 Proposed for Approval

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Note: an Interpretation cannot be used to change a standard.

Request for an Interpretation of a Reliability Standard
Date submitted: October 15, 2009
Date accepted: November 30, 2009
Contact information for person requesting the interpretation:
Name: Thomas E Washburn
Organization: Florida Municipal Power Pool
Telephone: 407-384-4066
E-mail: twashburn@ouc.com
Identify the standard that needs clarification:
Standard Number (include version number): TOP-002-2a
Standard Title: Normal Operations Planning
Identify specifically what requirement needs clarification:
Requirement Number and Text of Requirement: R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). **Clarification needed:** Requirement 10 is proposed to be eliminated in Project 2007-03 because it is redundant with TOP-004-0 R1, which only applies to TOP not to BA. However, that will not be effective for more than two years. In the meantime, in Requirement 10 is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs?
Identify the material impact associated with this interpretation:
Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard. Not having the correct interpretation of this requirement could cause a BA only (BA that is not a TOP) to be found non-compliant.

Project 2009-27: Response to Request for an Interpretation of TOP-002-2a, Requirement R10, for Florida Municipal Power Pool

The following interpretation of TOP-002-2a — Normal Operations Planning, Requirement R10, was developed by the Real-time Operations Standard Drafting Team.

Requirement Number and Text of Requirement

R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).

Question

In Requirement 10, is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs?

Response

Yes. As stated in the NERC *Glossary of Terms used in Reliability Standards*, the Balancing Authority is responsible for integrating resource plans ahead of time, maintaining load-interchange-generation balance within a Balancing Authority Area, and supporting Interconnection frequency in real time. The Balancing Authority does not possess the Bulk Electric System information necessary to manage transmission flows (MW, MVAR or Ampere) or voltage. Therefore, the Balancing Authority must follow the directions of the Transmission Operator to meet all SOLs and IROLs.

Exhibit B

Reliability Standard TOP-002-2b — Normal Operations Planning, that includes the appended interpretation to Requirement R10

A. Introduction

1. **Title:** **Normal Operations Planning**

2. **Number:** TOP-002-2b

3. **Purpose:** Current operations plans and procedures are essential to being prepared for reliable operations, including response for unplanned events.

4. **Applicability**

   4.1. Balancing Authority.

   4.2. Transmission Operator.

   4.3. Generator Operator.

   4.4. Load Serving Entity.

   4.5. Transmission Service Provider.

5. **Effective Date:** Immediately after approval of applicable regulatory authorities. FERC Approved 12/2/09

B. Requirements

R1. Each Balancing Authority and Transmission Operator shall maintain a set of current plans that are designed to evaluate options and set procedures for reliable operation through a reasonable future time period. In addition, each Balancing Authority and Transmission Operator shall be responsible for using available personnel and system equipment to implement these plans to ensure that interconnected system reliability will be maintained.

R2. Each Balancing Authority and Transmission Operator shall ensure its operating personnel participate in the system planning and design study processes, so that these studies contain the operating personnel perspective and system operating personnel are aware of the planning purpose.

R3. Each Load Serving Entity and Generator Operator shall coordinate (where confidentiality agreements allow) its current-day, next-day, and seasonal operations with its Host Balancing Authority and Transmission Service Provider. Each Balancing Authority and Transmission Service Provider shall coordinate its current-day, next-day, and seasonal operations with its Transmission Operator.

R4. Each Balancing Authority and Transmission Operator shall coordinate (where confidentiality agreements allow) its current-day, next-day, and seasonal planning and operations with neighboring Balancing Authorities and Transmission Operators and with its Reliability Coordinator, so that normal Interconnection operation will proceed in an orderly and consistent manner.

R5. Each Balancing Authority and Transmission Operator shall plan to meet scheduled system configuration, generation dispatch, interchange scheduling and demand patterns.

R6. Each Balancing Authority and Transmission Operator shall plan to meet unscheduled changes in system configuration and generation dispatch (at a minimum N-1 Contingency planning) in accordance with NERC, Regional Reliability Organization, subregional, and local reliability requirements.

R7. Each Balancing Authority shall plan to meet capacity and energy reserve requirements, including the deliverability/capability for any single Contingency.

R8. Each Balancing Authority shall plan to meet voltage and/or reactive limits, including the deliverability/capability for any single contingency.

R9. Each Balancing Authority shall plan to meet Interchange Schedules and ramps.

R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).

R11. The Transmission Operator shall perform seasonal, next-day, and current-day Bulk Electric System studies to determine SOLs. Neighboring Transmission Operators shall utilize identical SOLs for common facilities. The Transmission Operator shall update these Bulk Electric System studies as necessary to reflect current system conditions; and shall make the results of Bulk Electric System studies available to the Transmission Operators, Balancing Authorities (subject to confidentiality requirements), and to its Reliability Coordinator.

R12. The Transmission Service Provider shall include known SOLs or IROLs within its area and neighboring areas in the determination of transfer capabilities, in accordance with filed tariffs and/or regional Total Transfer Capability and Available Transfer Capability calculation processes.

R13. At the request of the Balancing Authority or Transmission Operator, a Generator Operator shall perform generating real and reactive capability verification that shall include, among other variables, weather, ambient air and water conditions, and fuel quality and quantity, and provide the results to the Balancing Authority or Transmission Operator operating personnel as requested.

R14. Generator Operators shall, without any intentional time delay, notify their Balancing Authority and Transmission Operator of changes in capabilities and characteristics including but not limited to:

R14.1. Changes in real and reactive output capabilities. (Retired August 1, 2007)

R14.1. Changes in real output capabilities. (Effective August 1, 2007)

R14.2. Automatic Voltage Regulator status and mode setting. (Retired August 1, 2007)

R15. Generation Operators shall, at the request of the Balancing Authority or Transmission Operator, provide a forecast of expected real power output to assist in operations planning (e.g., a seven-day forecast of real output).

R16. Subject to standards of conduct and confidentiality agreements, Transmission Operators shall, without any intentional time delay, notify their Reliability Coordinator and Balancing Authority of changes in capabilities and characteristics including but not limited to:

R16.1. Changes in transmission facility status.

R16.2. Changes in transmission facility rating.

R17. Balancing Authorities and Transmission Operators shall, without any intentional time delay, communicate the information described in the requirements R1 to R16 above to their Reliability Coordinator.

R18. Neighboring Balancing Authorities, Transmission Operators, Generator Operators, Transmission Service Providers and Load Serving Entities shall use uniform line identifiers when referring to transmission facilities of an interconnected network.

R19. Each Balancing Authority and Transmission Operator shall maintain accurate computer models utilized for analyzing and planning system operations.

C. Measures

M1. Each Balancing Authority and Transmission Operator shall have and provide upon request evidence that could include, but is not limited to, documented planning procedures, copies of current day plans, copies of seasonal operations plans, or other equivalent evidence that will be used to confirm that it maintained a set of current plans. (Requirement 1 Part 1).

M2. Each Balancing Authority and Transmission Operator shall have and provide upon request evidence that could include, but is not limited to, copies of current day plans or other equivalent evidence that will be used to confirm that its plans address Requirements 5, 6, and 10.

M3. Each Balancing Authority shall have and provide upon request evidence that could include, but is not limited to, copies of current day plans or other equivalent evidence that will be used to confirm that its plans address Requirements 7, 8, and 9.

M4. Each Transmission Operator shall have and provide upon request evidence that could include, but is not limited to, its next-day, and current-day Bulk Electric System studies used to determine SOLs or other equivalent evidence that will be used to confirm that its studies reflect current system conditions. (Requirement 11 Part 1)

M5. Each Transmission Operator shall have and provide upon request evidence that could include, but is not limited to, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence that will be used to confirm that the results of Bulk Electric System studies were made available to the Transmission Operators, Balancing Authorities (subject to confidentiality requirements), and to its Reliability Coordinator. (Requirement 11 Part 2)

M6. Each Generator Operator shall have and provide upon request evidence that, when requested by either a Transmission Operator or Balancing Authority, it performed a generating real and reactive capability verification and provided the results to the requesting entity in accordance with Requirement 13.

M7. Each Generator Operator shall have and provide upon request evidence that could include, but is not limited to, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence that will be used to confirm that without any intentional time delay, it notified its Balancing Authority and Transmission Operator of changes in real and reactive capabilities and AVR status. (Requirement 14)

M8. Each Generator Operator shall have and provide upon request evidence that could include, but is not limited to, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence that will be used to confirm that, on request, it provided a forecast of expected real power output to assist in operations planning. (Requirement 15)

M9. Each Transmission Operators shall have and provide upon request evidence that could include, but is not limited to, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence that will be used to confirm that, without any intentional time delay, it notified its Balancing Authority and Reliability Coordinator of changes in capabilities and characteristics. (Requirement16)

M10. Each Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider and Load Serving Entity shall have and provide upon request evidence that could include, but is not limited to, a list of interconnected transmission facilities and their line identifiers at each end or other equivalent evidence that will be used to confirm that it used uniform line identifiers when referring to transmission facilities of an interconnected network. (Requirement 18)

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organizations shall be responsible for compliance monitoring.

1.2. Compliance Monitoring and Reset Time Frame

One or more of the following methods will be used to assess compliance:

- Self-certification (Conducted annually with submission according to schedule.)
- Spot Check Audits (Conducted anytime with up to 30 days notice given to prepare.)
- Periodic Audit (Conducted once every three years according to schedule.)
- Triggered Investigations (Notification of an investigation must be made within 60 days of an event or complaint of noncompliance. The entity will have up to 30 calendar days to prepare for the investigation. An entity may request an extension of the preparation period and the extension will be considered by the Compliance Monitor on a case-by-case basis.)

The Performance-Reset Period shall be 12 months from the last finding of non-compliance.

1.3. Data Retention

For Measures 1 and 2, each Transmission Operator shall have its current plans and a rolling 6 months of historical records (evidence).

For Measures 1, 2, and 3 each Balancing Authority shall have its current plans and a rolling 6 months of historical records (evidence).

For Measure 4, each Transmission Operator shall keep its current plans (evidence).

For Measures 5 and 9, each Transmission Operator shall keep 90 days of historical data (evidence).

For Measures 6, 7 and 8, each Generator Operator shall keep 90 days of historical data (evidence).

For Measure 10, each Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, and Load-serving Entity shall have its current list interconnected transmission facilities and their line identifiers at each end or other equivalent evidence as evidence.

If an entity is found non-compliant the entity shall keep information related to the noncompliance until found compliant or for two years plus the current year, whichever is longer.

Evidence used as part of a triggered investigation shall be retained by the entity being investigated for one year from the date that the investigation is closed, as determined by the Compliance Monitor,

The Compliance Monitor shall keep the last periodic audit report and all supporting compliance data

1.4. Additional Compliance Information

None.

2. Levels of Non-Compliance for Balancing Authorities:

2.1. Level 1: Did not use uniform line identifiers when referring to transmission facilities of an interconnected network as specified in R18.

2.2. Level 2: Not applicable.

2.3. Level 3: Not applicable.

2.4. Level 4: There shall be a separate Level 4 non-compliance, for every one of the following requirements that is in violation:

2.4.1 Did not maintain an updated set of current-day plans as specified in R1.

2.4.2 Plans did not meet one or more of the requirements specified in R5 through R10.

3. Levels of Non-Compliance for Transmission Operators

3.1. Level 1: Did not use uniform line identifiers when referring to transmission facilities of an interconnected network as specified in R18.

3.2. Level 2: Not applicable.

3.3. Level 3: One or more of Bulk Electric System studies were not made available as specified in R11.

3.4. Level 4: There shall be a separate Level 4 non-compliance, for every one of the following requirements that is in violation:

3.4.1 Did not maintain an updated set of current-day plans as specified in R1.

3.4.2 Plans did not meet one or more of the requirements in R5, R6, and R10.

3.4.3 Studies not updated to reflect current system conditions as specified in R11.

3.4.4 Did not notify its Balancing Authority and Reliability Coordinator of changes in capabilities and characteristics as specified in R16.

4. Levels of Non-Compliance for Generator Operators:

4.1. Level 1: Did not use uniform line identifiers when referring to transmission facilities of an interconnected network as specified in R18.

4.2. Level 2: Not applicable.

4.3. Level 3: Not applicable.

4.4. Level 4: There shall be a separate Level 4 non-compliance, for every one of the following requirements that is in violation:

4.4.1 Did not verify and provide a generating real and reactive capability verification and provide the results to the requesting entity as specified in R13.

4.4.2 Did not notify its Balancing Authority and Transmission Operator of changes in capabilities and characteristics as specified in R14.

4.4.3 Did not provide a forecast of expected real power output to assist in operations planning as specified in R15.

5. Levels of Non-Compliance for Transmission Service Providers and Load-serving Entities:

5.1. Level 1: Did not use uniform line identifiers when referring to transmission facilities of an interconnected network as specified in R18.

5.2. Level 2: Not applicable.

5.3. Level 3: Not applicable.

5.4. Level 4: Not applicable.

E. Regional Differences

None identified.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed "Proposed" from Effective Date	Errata
1	November 1, 2006	Adopted by Board of Trustees	Revised
2	June 14, 2007	Fixed typo in R11., (subject to …)	Errata
2a	February 10, 2009	Added Appendix 1 – Interpretation of R11 approved by BOT on February 10, 2009	Interpretation
2a	December 2, 2009	Interpretation of R11 approved by FERC on December 2, 2009	Same Interpretation
2b	March 10, 2011	Added Appendix 2 – Interpretation of R10 approved by BOT on March 10, 2011	Interpretation
2b	November 4, 2010	Adopted by the Board of Trustees	

Appendix 1

Interpretation of Requirement R11

Requirement Number and Text of Requirement

Requirement R11: The Transmission Operator shall perform seasonal, next-day, and current-day Bulk Electric System studies to determine SOLs. Neighboring Transmission Operators shall utilize identical SOLs for common facilities. The Transmission Operator shall update these Bulk Electric System studies as necessary to reflect current system conditions; and shall make the results of Bulk Electric System studies available to the Transmission Operators, Balancing Authorities (subject to confidentiality requirements), and to its Reliability Coordinator.

Question #1
Is the Transmission Operator required to conduct a "unique" study for each operating day, even when the actual or expected system conditions are identical to other days already studied? In other words, can a study be used for more than one day?

Response to Question #1
Requirement R11 mandates that each Transmission Operator review (i.e., study) the state of its Transmission Operator area both in advance of each day and during each day. Each day must have "a" study that can be applied to it, but it is not necessary to generate a "unique" study for each day. Therefore, it is acceptable for a Transmission Operator to use a particular study for more than one day.

Question #2
Are there specific actions required to implement a "study"? In other words, what constitutes a study?

Response to Question #2
The requirement does not mandate a particular type of review or study. The review or study may be based on complex computer studies or a manual reasonability review of previously existing study results. The requirement is designed to ensure the Transmission Operator maintains sensitivity to what is happening or what is about to happen.

Question #3
Does the term, "to determine SOLs" as used in the first sentence of Requirement R11 mean the "determination of system operating limits" or does it mean the "identification of potential SOL violations?"

Response to Question #3
TOP-002-2 covers real-time and near-real-time studies. Requirement R11 is meant to include both determining new limits and identifying potential "exceedances" of pre-defined SOLs. If system conditions indicate to the Transmission Operator that prior studies and SOLs may be outdated, TOP-002-2 mandates the Transmission Operator to conduct a study to identify SOLs for the new conditions. If the Transmission Operator determines that system conditions do not warrant a new study, the primary purpose of the review is to check that the previously defined (i.e., defined from the current SOLs in use, or the set defined by the planners) SOLs are not expected to be exceeded. As written, the standard provides the Transmission Operator discretion regarding when to look for new SOLs and when to rely on its current set of SOLs.

Appendix 2

Requirement Number and Text of Requirement:

R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).

Clarification needed:

Requirement 10 is proposed to be eliminated in Project 2007-03 because it is redundant with TOP-004-0 R1, which only applies to TOP not to BA. However, that will not be effective for more than two years. In the meantime, in Requirement 10 is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs?

Project 2009-27: Response to Request for an Interpretation of TOP-002-2a, Requirement R10, for Florida Municipal Power Pool

The following interpretation of TOP-002-2a — Normal Operations Planning, Requirement R10, was developed by the Real-time Operations Standard Drafting Team.

Requirement Number and Text of Requirement

R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).

Question

In Requirement 10, is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs?

Response

Yes. As stated in the NERC *Glossary of Terms used in Reliability Standards*, the Balancing Authority is responsible for integrating resource plans ahead of time, maintaining load-interchange-generation balance within a Balancing Authority Area, and supporting Interconnection frequency in real time. The Balancing Authority does not possess the Bulk Electric System information necessary to manage transmission flows (MW, MVAR or Ampere) or voltage. Therefore, the Balancing Authority must follow the directions of the Transmission Operator to meet all SOLs and IROLs.

Exhibit C

Stakeholder Comments Received and an Explanation of How Those Comments Were Considered for the Interpretation of Requirement R10 of TOP-002-2a

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Consideration of Comments on Initial Ballot — Interpretation of TOP-002-2a —Normal Operations Planning, Requirement R10 for the FMPP (Project 2009-27)

Summary Consideration: An initial ballot was conducted from February 10-22, 2010 and achieved a quorum and a weighted segment approval of 90.82%. Based on balloter comments the drafting team made the following clarifying edits to the interpretation:

The Balancing Authority does not possess the Bulk Electric System information necessary to manage transmission flows (MW, MVAR or Ampere) or voltage. Therefore, the Balancing Authority must ~~communicate with and~~ follow the directions of the Transmission Operator to meet all SOLs and IROLs.

As the revisions identified above are minor and do not change the scope or intent of the interpretation, the team is moving the interpretation forward to a recirculation ballot.

If you feel that the drafting team overlooked your comments, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herbert Schrayshuen, at 609-452-8060 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.[1]

Voter	Entity	Segment	Vote	Comment
Robert Martinko	FirstEnergy Energy Delivery	1	Affirmative	FirstEnergy appreciates the work of the NERC standards interpretation team and is voting AFFIRMATIVE to the response provided. However, we believe the response could be better clarified by changing the latter part of the second sentence that currently reads " . . . to manage transmission flows." to state " . . . to manage transmission flows (MW, MVAR or Ampere) or voltage."
Kevin Querry	FirstEnergy Solutions	3	Affirmative	
Douglas Hohlbaugh	Ohio Edison Company	4	Affirmative	
Kenneth Dresner	FirstEnergy Solutions	5	Affirmative	
Mark S Travaglianti	FirstEnergy Solutions	6	Affirmative	

[1] The appeals process is in the Reliability Standards Development Procedure: http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf.

Voter	Entity	Segment	Vote	Comment
Response: **The SDT thanks you for your comment and has incorporated your suggestion. The revised sentence reads: The Balancing Authority does not possess the Bulk Electric System information necessary to manage transmission flows (MW, MVAR or Ampere) or voltage.**				
Charles H Yeung	Southwest Power Pool	2	Affirmative	NERC must clarify that the purpose for a "Request for Interpretation" is to clarify language in the approved standard and not to answer standards applicability questions. We believe the question posed by the requestor could have been answered through communications with between entity and the RE or the entity and NERC staff. The industry should not have to expend resources to review and vote on requests that can be answered through other means.
Response: **The SDT thanks you and agrees with your comment. This issue has been identified and will be presented to the Standards Committee.**				
Kim Warren	Independent Electricity System Operator	2	Affirmative	The IESO is concerned that in recent months, there have been an increasing number of simplistic interpretations being put in front of the entire balloting body. In our view, some of the inquiries could have been addressed via other avenues than the formal interpretation process. We suggest that NERC expeditiously develop an alternative approach, similar to the Information Request Program established by the FRCC, to field industry questions before they rise up to the formal interpretation request level. Industry participants should be encouraged to use other available resources and avenues instead of or before proceeding to a formal interpretation process to obtain understanding of standard applicability and compliance.
Response: **The SDT thanks you and agrees with your comment. This issue has been identified and will be presented to the Standards Committee.**				
Kent Saathoff	Electric Reliability Council of Texas, Inc.	10	Negative	The requirement in R10 is that BAs and TOPs have plans that meet all SOLs and IROLs. The request asks if BAs are required to maintain load-supply balance under the direction of the TOPs meeting SOLs and IROLs. The interpretation answers the question in the affirmative, stating the BA must communicate with and follow the directions of the TOP to meet all SOLs and IROLs. There are several problems with the interpretation. The interpretation reads obligations into the requirement that are not addressed in the requirement. The language of R10 is clear - the BA shall plan to meet SOLs and IROLs. This establishes what must be done, but does not specify how the BA should plan to meet those limits. Clearly a BA would be required to follow the directions of a TOP (and RC) with respect to operation of the transmission system, but that obligation is not what is prescribed under this requirement. The interpretation also uses the NERC Glossary of Terms to support its conclusions. Specifically, the interpretation team notes that, based on the definition, the BA cannot manage

Voter	Entity	Segment	Vote	Comment
				transmission flows because the general roles of the BA described in the definition do not provide access to the necessary information. The Glossary establishes very high-level definitions that generally describe terms. These general definitions should not be used to interpret requirements that prescribe specific actions/obligations. In this case, the language in the requirement is clear - the BA is obligated to develop a plan. There are no prescriptions with respect to the details of the plan.
Response: **The SDT agrees. As we said – "the Balancing Authority must follow the directions of the TOP…" There is no suggestion of 'how' to follow those directions. With regards to the interpretation itself, the SDT must adhere to the Draft Guidelines for Developing a Response to Requests for Interpretation, the following is an excerpted guideline:** With a clear understanding of the standard's purpose and the technical engineering approach that best serves reliability, the team must judge whether the standard as written can be interpreted consistent with these interests using the following principles: a. The interpretation cannot change the requirement or standard. That is, the interpretation cannot expand the scope of the requirement beyond the language in the requirement. b. The interpretation must address the question posed or the team must explain why it cannot address the question. c. The interpretation drafting team has full latitude to respond to a question using other reliability standards requirements that were not identified specifically in the request if that information addresses the issue. d. The interpretation itself must add clarity and not be ambiguous or subject to interpretation. e. The interpretation should address the intent of the requirement and the best interest of reliability. The interpretation of the requirement, which if implemented by the applicable entities, will provide for a reliable bulk power system, consistent with good utility practice and the public interest. This intends that the interpretation will not lower the current level of compliance to the requirement by the applicable entities.				
Henry Ernst-Jr	Duke Energy Carolina	3	Negative	We believe that the drafting team should focus on the coordination that must take place between the BA and TOP. This Interpretation should be modified as follows: "The BA is responsible for integrating resource planning ahead of time, in coordination with its associated TOP, to address SOLs and IROLs that the TOP has identified in the current planning timeframe. The BA also maintains load-generation balance within the BA Area and supports interconnection frequency in real time. The BA does not possess the Bulk Electric System information necessary to manage transmission flows. Therefore the BA must coordinate with and follow the directions of the TOP to meet all SOLs and IROLs."

Voter	Entity	Segment	Vote	Comment
Response: The SDT thanks you for your comment. The suggested revision expands on the requirement and was not adopted.				
Gregory L Pieper	Xcel Energy, Inc.	1	Negative	We suggest the appropriate language for the interpretation should be “To this end and in accordance with NERC Reliability Standards BAL-001-0.1a and BAL-002-0, Balancing Authorities are required to meet the requirements of these standards.” This would eliminate ambiguities between the three standards.
Response: The SDT thanks you for your comment. Nothing in this interpretation allows or excuses a Balancing Authority from complying with NERC Reliability Standards BAL-001-0.1a and BAL-002-0.				
Anthony Jankowski	Wisconsin Energy Corp.	4	Negative	What required communication is being mentioned in the sentence "Therefore, the Balancing authority must communicate with and follow the directions of the Transmission Operator to meet all SOLs and IROLs."? Is this communication initiated by the BA? Before, during, or after the SOL or IROL (or all three)? Communication requirements are in NERC Standard COM-001. They are not clarifying here. Recommend removing the phrase "communicating with and".
Response: The SDT thanks you for your comment and has incorporated your suggestion. The revised sentence reads: “Therefore, the Balancing Authority must follow the directions of the Transmission Operator to meet all SOLs and IROLs.”				

Exhibit D

Complete Record of Development of the Interpretation of Requirement R10 of TOP-002-2a — Normal Operations Planning.

Project 2009-27
Interpretation of TOP-002-2a R10

Related Files

Status:
Approved by the Board of Trustees on November 4, 2010.

Purpose / Industry Need:
Florida Municipal Power Pool (FMPP) is seeking clarification as to whether Requirement R10 requires the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs for meeting all SOLs and IROLs.

In accordance with the Reliability Standards Development Procedure, the interpretation must be posted for a 30-day pre-ballot review, and then balloted. There is no public comment period for an interpretation. Balloting will be conducted following the same method used for balloting standards. If the interpretation is approved by its ballot pool, then the interpretation will be appended to the standard and will become effective when adopted by the NERC Board of Trustees and approved by the applicable regulatory authorities. The interpretation will remain appended to the standard until the standard is revised through the normal standards development process. When the standard is revised, the clarifications provided by the interpretation will be incorporated into the revised standard.

Draft	Action	Dates	Results	Consideration of Comments
FMPP TOP-002-2a Requirement R10 Interpretation Clean(8) | Redline(9)	Recirculation Ballot Vote>> | Info(10)	10/06/10 - 10/16/10 (closed)	Summary(12) Full Record(11)	
FMPP TOP-002-2a Requirement R10 Request for Interpretation(2) Interpretation(1)	Initial Ballot Vote>> | Info(4)	02/10/10 - 02/22/10 (closed)	Summary(6) Full Record(5)	Consideration of Comments(7)
	Pre-ballot Review Join>> | Info(3)	01/11/10 - 02/10/10 (closed)		

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Note: an Interpretation cannot be used to change a standard.

Request for an Interpretation of a Reliability Standard	
Date submitted: October 15, 2009	
Date accepted: November 30, 2009	
Contact information for person requesting the interpretation:	
Name:	Thomas E Washburn
Organization:	Florida Municipal Power Pool
Telephone:	407-384-4066
E-mail:	twashburn@ouc.com
Identify the standard that needs clarification:	
Standard Number (include version number):	TOP-002-2a
Standard Title:	Normal Operations Planning
Identify specifically what requirement needs clarification:	
Requirement Number and Text of Requirement: R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). **Clarification needed:** Requirement 10 is proposed to be eliminated in Project 2007-03 because it is redundant with TOP-004-0 R1, which only applies to TOP not to BA. However, that will not be effective for more than two years. In the meantime, in Requirement 10 is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs?	
Identify the material impact associated with this interpretation:	
Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard. Not having the correct interpretation of this requirement could cause a BA only (BA that is not a TOP) to be found non-compliant.	

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Project 2009-27: Response to Request for an Interpretation of TOP-002-2a, Requirement R10, for Florida Municipal Power Pool

The following interpretation of TOP-002-2a — Normal Operations Planning, Requirement R10, was developed by the Real-time Operations Standard Drafting Team.

Requirement Number and Text of Requirement

R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).

Question

In Requirement 10, is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs?

Response

Yes. As stated in the NERC *Glossary of Terms used in Reliability Standards*, the Balancing Authority is responsible for integrating resource plans ahead of time, maintaining load-interchange-generation balance within a Balancing Authority Area, and supporting Interconnection frequency in real time. The Balancing Authority does not possess the Bulk Electric System information necessary to manage transmission flows. Therefore, the Balancing Authority must communicate with and follow the directions of the Transmission Operator to meet all SOLs and IROLs.

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Note: an Interpretation cannot be used to change a standard.

Request for an Interpretation of a Reliability Standard
Date submitted: October 15, 2009
Date accepted: November 30, 2009
Contact information for person requesting the interpretation:
Name: Thomas E Washburn
Organization: Florida Municipal Power Pool
Telephone: 407-384-4066
E-mail: twashburn@ouc.com
Identify the standard that needs clarification:
Standard Number (include version number): TOP-002-2a
Standard Title: Normal Operations Planning
Identify specifically what requirement needs clarification:
Requirement Number and Text of Requirement: R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). **Clarification needed:** Requirement 10 is proposed to be eliminated in Project 2007-03 because it is redundant with TOP-004-0 R1, which only applies to TOP not to BA. However, that will not be effective for more than two years. In the meantime, in Requirement 10 is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs?
Identify the material impact associated with this interpretation:
Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard. Not having the correct interpretation of this requirement could cause a BA only (BA that is not a TOP) to be found non-compliant.

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Standards Announcement

Ballot Pool and Pre-ballot Window
January 11–February 10, 2010

Now available at: https://standards.nerc.net/BallotPool.aspx

Project 2009-27: Interpretation of TOP-002-2a for the Florida Municipal Power Pool (FMPP)
An interpretation of standard TOP-002-2a — Normal Operations Planning, Requirement R10, for FMPP is posted for a 30-day pre-ballot review. Registered Ballot Body members may join the ballot pool to be eligible to vote on this interpretation **until 8 a.m. EST on February 10, 2010**.

During the pre-ballot window, members of the ballot pool may communicate with one another by using their "ballot pool list server." (Once the balloting begins, ballot pool members are prohibited from using the ballot pool list servers.) The list server for this ballot pool is: bp-2009-27_RFI_FMPP_in@nerc.com.

Next Steps
Voting will begin shortly after the pre-ballot review closes.

Project Background
FMPP is seeking clarification as to whether Requirement R10 requires the Balancing Authority to plan to maintain load-interchange-generation balance under the direction of the Transmission Operators for meeting all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).

The request and interpretation can be found on the project page:
http://www.nerc.com/filez/standards/Project2009-27_TOP-002-2a_R10_RFI_FMPP.html

Standards Development Process
The Reliability Standards Development Procedure contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

For more information or assistance,
please contact Shaun Streeter at shaun.streeter@nerc.net or at 609.452.8060.

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Standards Announcement

Initial Ballot Window Open

February 10-22, 2010

Now available at: https://standards.nerc.net/CurrentBallots.aspx

Project 2009-27: Interpretation of TOP-002-2a for the Florida Municipal Power Pool (FMPP)
An initial ballot window for an interpretation of standard TOP-002-2a — Normal Operations Planning, Requirement R10, for FMPP is now open **until 8 p.m. EST on February 22, 2010**.

Instructions

Members of the ballot pool associated with this project may log in and submit their votes from the following page: https://standards.nerc.net/CurrentBallots.aspx

Next Steps

Voting results will be posted and announced after the ballot window closes.

Project Background

FMPP is seeking clarification as to whether Requirement R10 requires the Balancing Authority to plan to maintain load-interchange-generation balance under the direction of the Transmission Operators for meeting all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).

The request and interpretation can be found on the project page:
http://www.nerc.com/filez/standards/Project2009-27_TOP-002-2a_R10_RFI_FMPP.html

Standards Development Process

The Reliability Standards Development Procedure contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

For more information or assistance,
please contact Shaun Streeter at shaun.streeter@nerc.net or at 609.452.8060.

Ballot Results

Ballot Name:	Project 2009-27 - Interpretation - TOP-002-2a for FMPAA_in
Ballot Period:	2/10/2010 - 2/22/2010
Ballot Type:	Initial
Total # Votes:	232
Total Ballot Pool:	273
Quorum:	**84.98 % The Quorum has been reached**
Weighted Segment Vote:	90.82 %
Ballot Results:	**The standard will proceed to recirculation ballot.**

Summary of Ballot Results

Segment	Ballot Pool	Segment Weight	Affirmative # Votes	Affirmative Fraction	Negative # Votes	Negative Fraction	Abstain # Votes	No Vote
1 - Segment 1.	76	1	55	0.887	7	0.113	3	11
2 - Segment 2.	11	1	9	0.9	1	0.1	0	1
3 - Segment 3.	65	1	51	0.944	3	0.056	4	7
4 - Segment 4.	18	1	12	0.923	1	0.077	2	3
5 - Segment 5.	50	1	34	0.919	3	0.081	2	11
6 - Segment 6.	35	1	28	0.966	1	0.034	1	5
7 - Segment 7.	0	0	0	0	0	0	0	0
8 - Segment 8.	6	0.4	4	0.4	0	0	0	2
9 - Segment 9.	4	0.3	2	0.2	1	0.1	1	0
10 - Segment 10.	8	0.5	4	0.4	1	0.1	2	1
Totals	**273**	**7.2**	**199**	**6.539**	**18**	**0.661**	**15**	**41**

Individual Ballot Pool Results

Segment	Organization	Member	Ballot	Comments
1	Allegheny Power	Rodney Phillips	Affirmative	
1	Ameren Services	Kirit S. Shah	Affirmative	
1	American Electric Power	Paul B. Johnson	Affirmative	
1	American Transmission Company, LLC	Jason Shaver	Affirmative	
1	Associated Electric Cooperative, Inc.	John Bussman		
1	Avista Corp.	Scott Kinney	Abstain	
1	BC Transmission Corporation	Gordon Rawlings	Affirmative	
1	Beaches Energy Services	Joseph S. Stonecipher	Affirmative	

1	Black Hills Corp	Eric Egge	Affirmative	
1	Bonneville Power Administration	Donald S. Watkins	Affirmative	
1	Brazos Electric Power Cooperative, Inc.	Tony Kroskey		
1	CenterPoint Energy	Paul Rocha	Abstain	
1	Central Maine Power Company	Brian Conroy	Affirmative	
1	City of Vero Beach	Randall McCamish	Affirmative	
1	City Utilities of Springfield, Missouri	Jeff Knottek	Affirmative	
1	Colorado Springs Utilities	Paul Morland	Affirmative	
1	Consolidated Edison Co. of New York	Christopher L de Graffenried	Affirmative	
1	Dairyland Power Coop.	Robert W. Roddy	Affirmative	
1	Deseret Power	James Tucker		
1	Dominion Virginia Power	William L. Thompson		
1	Duke Energy Carolina	Douglas E. Hils	Negative	
1	E.ON U.S. LLC	Larry Monday		
1	East Kentucky Power Coop.	George S. Carruba		
1	Empire District Electric Co.	Ralph Frederick Meyer	Affirmative	
1	Entergy Corporation	George R. Bartlett	Affirmative	
1	FirstEnergy Energy Delivery	Robert Martinko	Affirmative	View
1	Florida Keys Electric Cooperative Assoc.	Dennis Minton	Negative	
1	Gainesville Regional Utilities	Luther E. Fair	Affirmative	
1	Georgia Transmission Corporation	Harold Taylor, II	Abstain	
1	Great River Energy	Gordon Pietsch	Affirmative	
1	Hydro One Networks, Inc.	Ajay Garg	Affirmative	
1	Idaho Power Company	Ronald D. Schellberg		
1	ITC Transmission	Elizabeth Howell	Affirmative	
1	JEA	Ted E Hobson		
1	Kansas City Power & Light Co.	Michael Gammon	Affirmative	
1	Keys Energy Services	Stan T. Rzad	Affirmative	
1	Lakeland Electric	Larry E Watt	Affirmative	
1	Lincoln Electric System	Doug Bantam	Affirmative	
1	Long Island Power Authority	Jonathan Appelbaum	Affirmative	
1	Manitoba Hydro	Michelle Rheault	Affirmative	
1	MEAG Power	Danny Dees	Affirmative	
1	MidAmerican Energy Co.	Terry Harbour	Affirmative	
1	National Grid	Saurabh Saksena	Affirmative	
1	New York State Electric & Gas Corp.	Henry G. Masti	Affirmative	
1	Northeast Utilities	David H. Boguslawski	Affirmative	
1	Northern Indiana Public Service Co.	Kevin M Largura	Affirmative	
1	NorthWestern Energy	John Canavan	Affirmative	
1	Ohio Valley Electric Corp.	Robert Mattey	Affirmative	
1	Oklahoma Gas and Electric Co.	Marvin E VanBebber	Affirmative	
1	Omaha Public Power District	Lorees Tadros		
1	Orlando Utilities Commission	Brad Chase	Affirmative	
1	Otter Tail Power Company	Lawrence R. Larson	Affirmative	
1	PacifiCorp	Mark Sampson	Affirmative	
1	Platte River Power Authority	John C. Collins	Affirmative	
1	Potomac Electric Power Co.	Richard J. Kafka	Affirmative	
1	PowerSouth Energy Cooperative	Larry D. Avery	Negative	
1	PPL Electric Utilities Corp.	Brenda L Truhe	Affirmative	
1	Progress Energy Carolinas	Sammy Roberts	Affirmative	
1	Public Service Electric and Gas Co.	Kenneth D. Brown	Affirmative	
1	Puget Sound Energy, Inc.	Catherine Koch	Affirmative	
1	Sacramento Municipal Utility District	Tim Kelley	Affirmative	
1	Salt River Project	Robert Kondziolka	Affirmative	
1	San Diego Gas & Electric	Linda Brown	Affirmative	
1	Santee Cooper	Terry L. Blackwell	Affirmative	
1	SCE&G	Henry Delk, Jr.	Negative	
1	Seattle City Light	Pawel Krupa		
1	Sierra Pacific Power Co.	Richard Salgo	Affirmative	
1	Southern California Edison Co.	Dana Cabbell	Affirmative	
1	Southern Company Services, Inc.	Horace Stephen Williamson	Affirmative	
1	Southwest Transmission Cooperative, Inc.	James L. Jones	Affirmative	
1	Southwestern Power Administration	Gary W Cox		
1	Tampa Electric Co.	Thomas J. Szelistowski	Negative	
1	Tri-State G & T Association Inc.	Keith V. Carman	Affirmative	
1	Westar Energy	Allen Klassen	Negative	
1	Western Area Power Administration	Brandy A Dunn	Affirmative	

1	Xcel Energy, Inc.	Gregory L Pieper	Negative	View
2	Alberta Electric System Operator	Jason L. Murray	Affirmative	
2	BC Transmission Corporation	Faramarz Amjadi	Affirmative	
2	Electric Reliability Council of Texas, Inc.	Chuck B Manning	Negative	
2	Florida Municipal Power Pool	Thomas E Washburn	Affirmative	
2	Independent Electricity System Operator	Kim Warren	Affirmative	View
2	ISO New England, Inc.	Kathleen Goodman	Affirmative	
2	Midwest ISO, Inc.	Jason L Marshall	Affirmative	
2	New Brunswick System Operator	Alden Briggs	Affirmative	
2	New York Independent System Operator	Gregory Campoli		
2	PJM Interconnection, L.L.C.	Tom Bowe	Affirmative	
2	Southwest Power Pool	Charles H Yeung	Affirmative	View
3	Alabama Power Company	Bobby Kerley	Affirmative	
3	Ameren Services	Mark Peters	Affirmative	
3	American Electric Power	Raj Rana	Affirmative	
3	Atlantic City Electric Company	James V. Petrella	Affirmative	
3	BC Hydro and Power Authority	Pat G. Harrington	Abstain	
3	Black Hills Power	Andy Butcher	Affirmative	
3	Bonneville Power Administration	Rebecca Berdahl	Affirmative	
3	Central Lincoln PUD	Steve Alexanderson	Affirmative	
3	City of Bartow, Florida	Matt Culverhouse	Affirmative	
3	City of Clewiston	Lynne Mila	Affirmative	
3	City of Farmington	Linda R. Jacobson		
3	City of Green Cove Springs	Gregg R Griffin	Affirmative	
3	City Public Service of San Antonio	Edwin Les Barrow		
3	Consolidated Edison Co. of New York	Peter T Yost	Affirmative	
3	Constellation Energy	Carolyn Ingersoll	Affirmative	
3	Consumers Energy	David A. Lapinski	Affirmative	
3	Cowlitz County PUD	Russell A Noble		
3	Delmarva Power & Light Co.	Michael R. Mayer	Affirmative	
3	Detroit Edison Company	Kent Kujala	Affirmative	
3	Dominion Resources, Inc.	Jalal (John) Babik	Affirmative	
3	Duke Energy Carolina	Henry Ernst-Jr	Negative	View
3	Entergy Services, Inc.	Matt Wolf	Affirmative	
3	FirstEnergy Solutions	Kevin Querry	Affirmative	View
3	Florida Municipal Power Agency	Joe McKinney	Affirmative	
3	Florida Power & Light Co.	W. R. Schoneck	Abstain	
3	Florida Power Corporation	Lee Schuster	Affirmative	
3	Gainesville Regional Utilities	Kenneth Simmons	Affirmative	
3	Georgia Power Company	Anthony L Wilson	Affirmative	
3	Georgia System Operations Corporation	R Scott S. Barfield-McGinnis	Abstain	
3	Grays Harbor PUD	Wesley W Gray	Affirmative	
3	Great River Energy	Sam Kokkinen	Affirmative	
3	Gulf Power Company	Gwen S Frazier	Affirmative	
3	Hydro One Networks, Inc.	Michael D. Penstone	Affirmative	
3	JEA	Garry Baker	Affirmative	
3	Kansas City Power & Light Co.	Charles Locke	Affirmative	
3	Kissimmee Utility Authority	Gregory David Woessner	Affirmative	
3	Lakeland Electric	Mace Hunter	Affirmative	
3	Lincoln Electric System	Bruce Merrill	Affirmative	
3	Louisville Gas and Electric Co.	Charles A. Freibert		
3	Manitoba Hydro	Greg C Parent	Affirmative	
3	MEAG Power	Steven Grego	Abstain	
3	MidAmerican Energy Co.	Thomas C. Mielnik	Affirmative	
3	Mississippi Power	Don Horsley	Affirmative	
3	Municipal Electric Authority of Georgia	Steven M. Jackson		
3	New York Power Authority	Marilyn Brown	Affirmative	
3	Niagara Mohawk (National Grid Company)	Michael Schiavone	Affirmative	
3	Northern Indiana Public Service Co.	William SeDoris	Affirmative	
3	Ocala Electric Utility	David T. Anderson	Affirmative	
3	Orlando Utilities Commission	Ballard Keith Mutters	Affirmative	
3	PacifiCorp	John Apperson	Affirmative	
3	Platte River Power Authority	Terry L Baker	Affirmative	
3	Potomac Electric Power Co.	Robert Reuter	Affirmative	
3	Progress Energy Carolinas	Sam Waters	Affirmative	
3	Public Service Electric and Gas Co.	Jeffrey Mueller	Affirmative	
3	Public Utility District No. 2 of Grant County	Greg Lange	Affirmative	

3	Sacramento Municipal Utility District	James Leigh-Kendall	Affirmative	
3	Salt River Project	John T. Underhill	Affirmative	
3	San Diego Gas & Electric	Scott Peterson		
3	Santee Cooper	Zack Dusenbury	Affirmative	
3	Seattle City Light	Dana Wheelock		
3	South Carolina Electric & Gas Co.	Hubert C. Young	Affirmative	
3	Southern California Edison Co.	David Schiada	Affirmative	
3	Tampa Electric Co.	Ronald L Donahey	Negative	
3	Wisconsin Electric Power Marketing	James R. Keller	Negative	
3	Xcel Energy, Inc.	Michael Ibold	Affirmative	
4	Alliant Energy Corp. Services, Inc.	Kenneth Goldsmith	Affirmative	
4	City of Clewiston	Kevin McCarthy	Affirmative	
4	City of New Smyrna Beach Utilities Commission	Timothy Beyrle	Affirmative	
4	Consumers Energy	David Frank Ronk	Affirmative	
4	Detroit Edison Company	Daniel Herring	Affirmative	
4	Florida Municipal Power Agency	Frank Gaffney	Affirmative	
4	Fort Pierce Utilities Authority	Thomas W. Richards	Affirmative	
4	Georgia System Operations Corporation	Guy Andrews	Abstain	
4	Integrys Energy Group, Inc.	Christopher Plante	Abstain	
4	Madison Gas and Electric Co.	Joseph G. DePoorter	Affirmative	
4	Northern California Power Agency	Fred E. Young	Affirmative	
4	Ohio Edison Company	Douglas Hohlbaugh	Affirmative	View
4	Old Dominion Electric Coop.	Mark Ringhausen		
4	Public Utility District No. 1 of Douglas County	Henry E. LuBean	Affirmative	
4	Sacramento Municipal Utility District	Mike Ramirez	Affirmative	
4	Seattle City Light	Hao Li		
4	Seminole Electric Cooperative, Inc.	Steven R Wallace		
4	Wisconsin Energy Corp.	Anthony Jankowski	Negative	View
5	AEP Service Corp.	Brock Ondayko	Affirmative	
5	Amerenue	Sam Dwyer		
5	Avista Corp.	Edward F. Groce	Abstain	
5	Black Hills Corp	George Tatar	Affirmative	
5	Bonneville Power Administration	Francis J. Halpin	Affirmative	
5	City of Tallahassee	Alan Gale	Affirmative	
5	City Water, Light & Power of Springfield	Karl E. Kohlrus	Affirmative	
5	Colmac Clarion/Piney Creek LP	Harvie D. Beavers	Affirmative	
5	Consolidated Edison Co. of New York	Edwin E Thompson	Affirmative	
5	Consumers Energy	James B Lewis	Affirmative	
5	Covanta Energy	Samuel Cabassa		
5	Dairyland Power Coop.	Warren Schaefer	Affirmative	
5	Detroit Edison Company	Ronald W. Bauer	Affirmative	
5	Dominion Resources, Inc.	Mike Garton	Affirmative	
5	Duke Energy	Robert Smith	Negative	
5	Entergy Corporation	Stanley M Jaskot	Affirmative	
5	FirstEnergy Solutions	Kenneth Dresner	Affirmative	View
5	Florida Municipal Power Agency	David Schumann	Affirmative	
5	FPL Energy	Benjamin Church		
5	Great River Energy	Cynthia E Sulzer	Affirmative	
5	JEA	Donald Gilbert	Affirmative	
5	Kansas City Power & Light Co.	Scott Heidtbrink	Affirmative	
5	Kissimmee Utility Authority	Mike Blough	Affirmative	
5	Lakeland Electric	Thomas J Trickey	Affirmative	
5	Lincoln Electric System	Dennis Florom	Affirmative	
5	Louisville Gas and Electric Co.	Charlie Martin		
5	Manitoba Hydro	Mark Aikens	Affirmative	
5	New York Power Authority	Gerald Mannarino		
5	Northern Indiana Public Service Co.	Michael K Wilkerson	Affirmative	
5	Northern States Power Co.	Liam Noailles	Affirmative	
5	Orlando Utilities Commission	Richard Kinas		
5	PacifiCorp	Sandra L. Shaffer	Affirmative	
5	Portland General Electric Co.	Gary L Tingley		
5	PowerSouth Energy Cooperative	Tim Hattaway	Negative	
5	PPL Generation LLC	Mark A. Heimbach	Affirmative	
5	Progress Energy Carolinas	Wayne Lewis	Affirmative	
5	PSEG Power LLC	David Murray	Affirmative	
5	Reedy Creek Energy Services	Bernie Budnik		

5	RRI Energy	Thomas J. Bradish	Affirmative	
5	Sacramento Municipal Utility District	Bethany Wright	Affirmative	
5	Salt River Project	Glen Reeves	Affirmative	
5	Seattle City Light	Michael J. Haynes	Abstain	
5	Seminole Electric Cooperative, Inc.	Brenda K. Atkins		
5	South California Edison Company	Ahmad Sanati		
5	South Carolina Electric & Gas Co.	Richard Jones	Affirmative	
5	Tenaska, Inc.	Scott M. Helyer	Affirmative	
5	U.S. Army Corps of Engineers Northwestern Division	Karl Bryan	Affirmative	
5	U.S. Bureau of Reclamation	Martin Bauer P.E.	Affirmative	
5	Wisconsin Electric Power Co.	Linda Horn	Negative	
5	Wisconsin Public Service Corp.	Leonard Rentmeester		
6	AEP Marketing	Edward P. Cox	Affirmative	
6	Ameren Energy Marketing Co.	Jennifer Richardson		
6	Black Hills Corp	Tyson Taylor		
6	Bonneville Power Administration	Brenda S. Anderson	Affirmative	
6	Consolidated Edison Co. of New York	Nickesha P Carrol	Affirmative	
6	Constellation Energy Commodities Group	Chris Lyons	Affirmative	
6	Dominion Resources, Inc.	Louis S Slade	Affirmative	
6	Duke Energy Carolina	Walter Yeager	Negative	
6	Entergy Services, Inc.	Terri F Benoit	Affirmative	
6	Eugene Water & Electric Board	Daniel Mark Bedbury	Affirmative	
6	FirstEnergy Solutions	Mark S Travaglianti	Affirmative	View
6	Florida Municipal Power Agency	Richard L. Montgomery	Affirmative	
6	Florida Power & Light Co.	Silvia P Mitchell		
6	Great River Energy	Donna Stephenson	Affirmative	
6	Kansas City Power & Light Co.	Thomas Saitta	Affirmative	
6	Lakeland Electric	Paul Shipps	Affirmative	
6	Lincoln Electric System	Eric Ruskamp	Affirmative	
6	Louisville Gas and Electric Co.	Daryn Barker	Affirmative	
6	Manitoba Hydro	Daniel Prowse	Affirmative	
6	New York Power Authority	Thomas Papadopoulos	Affirmative	
6	Northern Indiana Public Service Co.	Joseph O'Brien	Affirmative	
6	Omaha Public Power District	David Ried	Affirmative	
6	PacifiCorp	Gregory D Maxfield	Affirmative	
6	Progress Energy	James Eckelkamp	Affirmative	
6	PSEG Energy Resources & Trade LLC	James D. Hebson	Affirmative	
6	Public Utility District No. 1 of Chelan County	Hugh A. Owen	Affirmative	
6	RRI Energy	Trent Carlson	Affirmative	
6	Salt River Project	Mike Hummel	Affirmative	
6	Santee Cooper	Suzanne Ritter	Affirmative	
6	Seattle City Light	Dennis Sismaet	Abstain	
6	Seminole Electric Cooperative, Inc.	Trudy S. Novak		
6	Southern California Edison Co.	Marcus V Lotto	Affirmative	
6	SunGard Data Systems	Christopher K Heisler		
6	Western Area Power Administration - UGP Marketing	John Stonebarger	Affirmative	
6	Xcel Energy, Inc.	David F. Lemmons	Affirmative	
8	Edward C Stein	Edward C Stein		
8	James A Maenner	James A Maenner	Affirmative	
8	JDRJC Associates	Jim D. Cyrulewski	Affirmative	
8	Power Energy Group LLC	Peggy Abbadini		
8	Roger C Zaklukiewicz	Roger C Zaklukiewicz	Affirmative	
8	Volkmann Consulting, Inc.	Terry Volkmann	Affirmative	
9	California Energy Commission	William Mitchell Chamberlain	Affirmative	
9	Commonwealth of Massachusetts Department of Public Utilities	Donald E. Nelson	Affirmative	
9	Maine Public Utilities Commission	Jacob A McDermott	Abstain	
9	Utah Associated Municipal Power Systems	Tom Florence	Negative	
10	Electric Reliability Council of Texas, Inc.	Kent Saathoff	Negative	View
10	Florida Reliability Coordinating Council	Linda Campbell	Abstain	
10	Midwest Reliability Organization	Dan R. Schoenecker	Affirmative	
10	New York State Reliability Council	Alan Adamson	Affirmative	
10	Northeast Power Coordinating Council, Inc.	Guy V. Zito	Affirmative	
10	ReliabilityFirst Corporation	Jacquie Smith		
10	SERC Reliability Corporation	Carter B Edge	Abstain	
10	Western Electricity Coordinating Council	Louise McCarren	Affirmative	

Legal and Privacy : 609.452.8060 voice : 609.452.9550 fax : 116-390 Village Boulevard : Princeton, NJ 08540-5721
Washington Office: 1120 G Street, N.W. : Suite 990 : Washington, DC 20005-3801

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Standards Announcement
Initial Ballot Results

Now available at: https://standards.nerc.net/Ballots.aspx

Project 2009-27: Interpretation of TOP-002-2a for the Florida Municipal Power Pool (FMPP)
The initial ballot for an interpretation of standard TOP-002-2a — Normal Operations Planning, Requirement R10, for FMPP ended on February 22, 2010.

Ballot Results
Voting statistics are listed below, and the Ballot Results Web page provides a link to the detailed results:

Quorum: 84.98%
Approval: 90.82%

Since at least one negative ballot included a comment, these results are not final. A second (or recirculation) ballot must be conducted. Ballot criteria are listed at the end of the announcement.

Next Steps
As part of the recirculation ballot process, the drafting team must draft and post responses to voter comments. The drafting team will also determine whether or not to make revisions to the balloted item(s). Should the team decide to make revisions, the revised item(s) will return to the initial ballot phase.

Project Background
FMPP is seeking clarification as to whether Requirement R10 requires the Balancing Authority to plan to maintain load-interchange-generation balance under the direction of the Transmission Operators for meeting all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).

The request and interpretation can be found on the project page:
http://www.nerc.com/filez/standards/Project2009-27_TOP-002-2a_R10_RFI_FMPP.html

Standards Development Process
The *Reliability Standards Development Procedure* contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

Ballot Criteria
Approval requires both a (1) quorum, which is established by at least 75% of the members of the ballot pool for submitting either an affirmative vote, a negative vote, or an abstention, and (2) A two-thirds majority of the weighted segment votes cast must be affirmative; the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and nonresponses. If there are no negative votes with reasons from the first ballot, the results of the first ballot shall stand. If, however, one or more members submit negative votes with reasons, a second ballot shall be conducted.

For more information or assistance,
please contact Shaun Streeter at shaun.streeter@nerc.net or at 609.452.8060.

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Consideration of Comments on Initial Ballot — Interpretation of TOP-002-2a —Normal Operations Planning, Requirement R10 for the FMPP (Project 2009-27)

Summary Consideration: An initial ballot was conducted from February 10-22, 2010 and achieved a quorum and a weighted segment approval of 90.82%. Based on balloter comments the drafting team made the following clarifying edits to the interpretation:

The Balancing Authority does not possess the Bulk Electric System information necessary to manage transmission flows (MW, MVAR or Ampere) or voltage. Therefore, the Balancing Authority must ~~communicate with and~~ follow the directions of the Transmission Operator to meet all SOLs and IROLs.

As the revisions identified above are minor and do not change the scope or intent of the interpretation, the team is moving the interpretation forward to a recirculation ballot.

If you feel that the drafting team overlooked your comments, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herbert Schrayshuen, at 609-452-8060 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.[1]

Voter	Entity	Segment	Vote	Comment
Robert Martinko	FirstEnergy Energy Delivery	1	Affirmative	FirstEnergy appreciates the work of the NERC standards interpretation team and is voting AFFIRMATIVE to the response provided. However, we believe the response could be better clarified by changing the latter part of the second sentence that currently reads " . . . to manage transmission flows." to state " . . . to manage transmission flows (MW, MVAR or Ampere) or voltage."
Kevin Querry	FirstEnergy Solutions	3	Affirmative	
Douglas Hohlbaugh	Ohio Edison Company	4	Affirmative	
Kenneth Dresner	FirstEnergy Solutions	5	Affirmative	
Mark S Travaglianti	FirstEnergy Solutions	6	Affirmative	

[1] The appeals process is in the Reliability Standards Development Procedure: http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf.

Voter	Entity	Segment	Vote	Comment
Response: **The SDT thanks you for your comment and has incorporated your suggestion. The revised sentence reads: The Balancing Authority does not possess the Bulk Electric System information necessary to manage transmission flows (MW, MVAR or Ampere) or voltage.**				
Charles H Yeung	Southwest Power Pool	2	Affirmative	NERC must clarify that the purpose for a "Request for Interpretation" is to clarify language in the approved standard and not to answer standards applicability questions. We believe the question posed by the requestor could have been answered through communications with between entity and the RE or the entity and NERC staff. The industry should not have to expend resources to review and vote on requests that can be answered through other means.
Response: **The SDT thanks you and agrees with your comment. This issue has been identified and will be presented to the Standards Committee.**				
Kim Warren	Independent Electricity System Operator	2	Affirmative	The IESO is concerned that in recent months, there have been an increasing number of simplistic interpretations being put in front of the entire balloting body. In our view, some of the inquiries could have been addressed via other avenues than the formal interpretation process. We suggest that NERC expeditiously develop an alternative approach, similar to the Information Request Program established by the FRCC, to field industry questions before they rise up to the formal interpretation request level. Industry participants should be encouraged to use other available resources and avenues instead of or before proceeding to a formal interpretation process to obtain understanding of standard applicability and compliance.
Response: **The SDT thanks you and agrees with your comment. This issue has been identified and will be presented to the Standards Committee.**				
Kent Saathoff	Electric Reliability Council of Texas, Inc.	10	Negative	The requirement in R10 is that BAs and TOPs have plans that meet all SOLs and IROLs. The request asks if BAs are required to maintain load-supply balance under the direction of the TOPs meeting SOLs and IROLs. The interpretation answers the question in the affirmative, stating the BA must communicate with and follow the directions of the TOP to meet all SOLs and IROLs. There are several problems with the interpretation. The interpretation reads obligations into the requirement that are not addressed in the requirement. The language of R10 is clear - the BA shall plan to meet SOLs and IROLs. This establishes what must be done, but does not specify how the BA should plan to meet those limits. Clearly a BA would be required to follow the directions of a TOP (and RC) with respect to operation of the transmission system, but that obligation is not what is prescribed under this requirement. The interpretation also uses the NERC Glossary of Terms to support its conclusions. Specifically, the interpretation team notes that, based on the definition, the BA cannot manage

Voter	Entity	Segment	Vote	Comment
				transmission flows because the general roles of the BA described in the definition do not provide access to the necessary information. The Glossary establishes very high-level definitions that generally describe terms. These general definitions should not be used to interpret requirements that prescribe specific actions/obligations. In this case, the language in the requirement is clear - the BA is obligated to develop a plan. There are no prescriptions with respect to the details of the plan.
Response: **The SDT agrees. As we said – "the Balancing Authority must follow the directions of the TOP…" There is no suggestion of 'how' to follow those directions. With regards to the interpretation itself, the SDT must adhere to the Draft Guidelines for Developing a Response to Requests for Interpretation, the following is an excerpted guideline:** With a clear understanding of the standard's purpose and the technical engineering approach that best serves reliability, the team must judge whether the standard as written can be interpreted consistent with these interests using the following principles: a. The interpretation cannot change the requirement or standard. That is, the interpretation cannot expand the scope of the requirement beyond the language in the requirement. b. The interpretation must address the question posed or the team must explain why it cannot address the question. c. The interpretation drafting team has full latitude to respond to a question using other reliability standards requirements that were not identified specifically in the request if that information addresses the issue. d. The interpretation itself must add clarity and not be ambiguous or subject to interpretation. e. The interpretation should address the intent of the requirement and the best interest of reliability. The interpretation of the requirement, which if implemented by the applicable entities, will provide for a reliable bulk power system, consistent with good utility practice and the public interest. This intends that the interpretation will not lower the current level of compliance to the requirement by the applicable entities.				
Henry Ernst-Jr	Duke Energy Carolina	3	Negative	We believe that the drafting team should focus on the coordination that must take place between the BA and TOP. This Interpretation should be modified as follows: "The BA is responsible for integrating resource planning ahead of time, in coordination with its associated TOP, to address SOLs and IROLs that the TOP has identified in the current planning timeframe. The BA also maintains load-generation balance within the BA Area and supports interconnection frequency in real time. The BA does not possess the Bulk Electric System information necessary to manage transmission flows. Therefore the BA must coordinate with and follow the directions of the TOP to meet all SOLs and IROLs."

Voter	Entity	Segment	Vote	Comment
Response: The SDT thanks you for your comment. The suggested revision expands on the requirement and was not adopted.				
Gregory L Pieper	Xcel Energy, Inc.	1	Negative	We suggest the appropriate language for the interpretation should be “To this end and in accordance with NERC Reliability Standards BAL-001-0.1a and BAL-002-0, Balancing Authorities are required to meet the requirements of these standards.” This would eliminate ambiguities between the three standards.
Response: The SDT thanks you for your comment. Nothing in this interpretation allows or excuses a Balancing Authority from complying with NERC Reliability Standards BAL-001-0.1a and BAL-002-0.				
Anthony Jankowski	Wisconsin Energy Corp.	4	Negative	What required communication is being mentioned in the sentence "Therefore, the Balancing authority must communicate with and follow the directions of the Transmission Operator to meet all SOLs and IROLs."? Is this communication initiated by the BA? Before, during, or after the SOL or IROL (or all three)? Communication requirements are in NERC Standard COM-001. They are not clarifying here. Recommend removing the phrase "communicating with and".
Response: The SDT thanks you for your comment and has incorporated your suggestion. The revised sentence reads: “Therefore, the Balancing Authority must follow the directions of the Transmission Operator to meet all SOLs and IROLs.”				

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Note: an Interpretation cannot be used to change a standard.

Request for an Interpretation of a Reliability Standard
Date submitted: October 15, 2009
Date accepted: November 30, 2009
Contact information for person requesting the interpretation:
Name: Thomas E Washburn
Organization: Florida Municipal Power Pool
Telephone: 407-384-4066
E-mail: twashburn@ouc.com
Identify the standard that needs clarification:
Standard Number (include version number): TOP-002-2a
Standard Title: Normal Operations Planning
Identify specifically what requirement needs clarification:
Requirement Number and Text of Requirement: R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). **Clarification needed:** Requirement 10 is proposed to be eliminated in Project 2007-03 because it is redundant with TOP-004-0 R1, which only applies to TOP not to BA. However, that will not be effective for more than two years. In the meantime, in Requirement 10 is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs?
Identify the material impact associated with this interpretation:
Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard. Not having the correct interpretation of this requirement could cause a BA only (BA that is not a TOP) to be found non-compliant.

Project 2009-27: Response to Request for an Interpretation of TOP-002-2a, Requirement R10, for Florida Municipal Power Pool

The following interpretation of TOP-002-2a — Normal Operations Planning, Requirement R10, was developed by the Real-time Operations Standard Drafting Team.

Requirement Number and Text of Requirement

R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).

Question

In Requirement 10, is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs?

Response

Yes. As stated in the NERC *Glossary of Terms used in Reliability Standards*, the Balancing Authority is responsible for integrating resource plans ahead of time, maintaining load-interchange-generation balance within a Balancing Authority Area, and supporting Interconnection frequency in real time. The Balancing Authority does not possess the Bulk Electric System information necessary to manage transmission flows (MW, MVAR or Ampere) or voltage. Therefore, the Balancing Authority must follow the directions of the Transmission Operator to meet all SOLs and IROLs.

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Note: an Interpretation cannot be used to change a standard.

Request for an Interpretation of a Reliability Standard
Date submitted: October 15, 2009
Date accepted: November 30, 2009
Contact information for person requesting the interpretation:
Name: Thomas E Washburn
Organization: Florida Municipal Power Pool
Telephone: 407-384-4066
E-mail: twashburn@ouc.com
Identify the standard that needs clarification:
Standard Number (include version number): TOP-002-2a
Standard Title: Normal Operations Planning
Identify specifically what requirement needs clarification:
Requirement Number and Text of Requirement: R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). **Clarification needed:** Requirement 10 is proposed to be eliminated in Project 2007-03 because it is redundant with TOP-004-0 R1, which only applies to TOP not to BA. However, that will not be effective for more than two years. In the meantime, in Requirement 10 is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs?
Identify the material impact associated with this interpretation:
Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard. Not having the correct interpretation of this requirement could cause a BA only (BA that is not a TOP) to be found non-compliant.

Project 2009-27: Response to Request for an Interpretation of TOP-002-2a, Requirement R10, for Florida Municipal Power Pool

The following interpretation of TOP-002-2a — Normal Operations Planning, Requirement R10, was developed by the Real-time Operations Standard Drafting Team.

Requirement Number and Text of Requirement

R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).

Question

In Requirement 10, is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs?

Response

Yes. As stated in the NERC *Glossary of Terms used in Reliability Standards*, the Balancing Authority is responsible for integrating resource plans ahead of time, maintaining load-interchange-generation balance within a Balancing Authority Area, and supporting Interconnection frequency in real time. The Balancing Authority does not possess the Bulk Electric System information necessary to manage transmission flows (MW, MVAR or Ampere) or voltage. Therefore, the Balancing Authority must ~~communicate with and~~ follow the directions of the Transmission Operator to meet all SOLs and IROLs.

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Standards Announcement

Recirculation Ballot Window Open
October 6–16, 2010

Now available at: https://standards.nerc.net/CurrentBallots.aspx

Interpretation of TOP-002-2a – Normal Operations Planning for the Florida Municipal Power Pool (FMPP) (Project 2009-27)

A recirculation ballot window for an interpretation of TOP-002-2a — Normal Operations Planning, Requirement R10 for Florida Municipal Power Pool is now open **until 8 p.m. EDT on October 16, 2010**.

Project Background

FMPP is seeking clarification as to whether Requirement R10 requires the Balancing Authority to plan to maintain load-interchange-generation balance under the direction of the Transmission Operators for meeting all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).

The request and interpretation are in a single document and can be found on the project page: http://www.nerc.com/filez/standards/Project2009-27_TOP-002-2a_R10_RFI_FMPP.html

Recirculation Ballot Process

The Standards Committee encourages all members of the Ballot Pool to review the consideration of comments submitted with the initial ballots. In the recirculation ballot, votes are counted by exception only. If a Ballot Pool member does not submit a revision to that member's original vote, the vote remains the same as in the first ballot. Members of the ballot pool may:

- Reconsider and change their vote from the first ballot
- Vote in the second ballot even if they did not vote on the first ballot
- Take no action if they do not want to change their original vote

Transition from Reliability Standards Development Procedure Version 7 – to Standard Processes Manual

Under the Reliability Standards Development Procedure Version 7, interpretations did not have any comment period and were posted for ballot once they were drafted. Under the Standard Processes Manual each interpretation is posted for a 30-day formal comment period; then the drafting team responds to comments; then the interpretation (revised if needed) is posted for a 45-day formal comment period conducted in parallel with an initial ballot. If there are no significant changes to the interpretation and the initial ballot sufficient affirmative votes for approval, then the interpretation proceeds to a recirculation ballot.

The addition of a comment period before the pre-ballot review period and the addition of a comment period in parallel with the initial ballot, are steps that were added to the process based on stakeholder comments

indicating that interpretations needed more stakeholder input before being finalized.

This interpretation had already been through an initial ballot when the Standard Processes Manual was approved, and the team made no significant changes to the interpretation following the initial ballot, thus this interpretation is moving forward for a recirculation ballot.

Next Steps

Voting results will be posted and announced after the recirculation ballot window closes.

Standards Process

The Standard Processes Manual contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

For more information or assistance, please contact Monica Benson, Standards Process Administrator, at monica.benson@nerc.net or at 609.452.8060.

North American Electric Reliability Corporation
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Ballot Results

Ballot Name:	Project 2009-27 - Interpretation - TOP-002-2a for FMPAA_rc
Ballot Period:	10/6/2010 - 10/16/2010
Ballot Type:	recirculation
Total # Votes:	249
Total Ballot Pool:	273
Quorum:	**91.21 % The Quorum has been reached**
Weighted Segment Vote:	93.44 %
Ballot Results:	**The Standard has Passed**

Summary of Ballot Results

Segment	Ballot Pool	Segment Weight	Affirmative # Votes	Affirmative Fraction	Negative # Votes	Negative Fraction	Abstain # Votes	No Vote
1 - Segment 1.	76	1	62	0.939	4	0.061	4	6
2 - Segment 2.	11	1	9	0.9	1	0.1	0	1
3 - Segment 3.	65	1	56	0.966	2	0.034	4	3
4 - Segment 4.	18	1	14	1	0	0	3	1
5 - Segment 5.	50	1	36	0.947	2	0.053	4	8
6 - Segment 6.	35	1	31	0.969	1	0.031	0	3
7 - Segment 7.	0	0	0	0	0	0	0	0
8 - Segment 8.	6	0.4	4	0.4	0	0	1	1
9 - Segment 9.	4	0.3	2	0.2	1	0.1	1	0
10 - Segment 10.	8	0.6	5	0.5	1	0.1	1	1
Totals	**273**	**7.3**	**219**	**6.821**	**12**	**0.479**	**18**	**24**

Individual Ballot Pool Results

Segment	Organization	Member	Ballot	Comments
1	Allegheny Power	Rodney Phillips	Affirmative	
1	Ameren Services	Kirit S. Shah	Affirmative	
1	American Electric Power	Paul B. Johnson	Affirmative	
1	American Transmission Company, LLC	Jason Shaver	Affirmative	
1	Associated Electric Cooperative, Inc.	John Bussman		
1	Avista Corp.	Scott Kinney	Abstain	
1	BC Transmission Corporation	Gordon Rawlings	Affirmative	
1	Beaches Energy Services	Joseph S. Stonecipher	Affirmative	

1	Black Hills Corp	Eric Egge	Affirmative	
1	Bonneville Power Administration	Donald S. Watkins	Affirmative	
1	Brazos Electric Power Cooperative, Inc.	Tony Kroskey		
1	CenterPoint Energy	Paul Rocha	Abstain	
1	Central Maine Power Company	Brian Conroy	Affirmative	
1	City of Vero Beach	Randall McCamish	Affirmative	
1	City Utilities of Springfield, Missouri	Jeff Knottek	Affirmative	
1	Colorado Springs Utilities	Paul Morland	Affirmative	
1	Consolidated Edison Co. of New York	Christopher L de Graffenried	Affirmative	
1	Dairyland Power Coop.	Robert W. Roddy	Affirmative	
1	Deseret Power	James Tucker	Affirmative	
1	Dominion Virginia Power	William L. Thompson		
1	Duke Energy Carolina	Douglas E. Hils	Negative	
1	E.ON U.S.	Larry Monday	Affirmative	
1	East Kentucky Power Coop.	George S. Carruba	Affirmative	
1	Empire District Electric Co.	Ralph Frederick Meyer	Affirmative	
1	Entergy Corporation	George R. Bartlett	Affirmative	
1	FirstEnergy Energy Delivery	Robert Martinko	Affirmative	View
1	Florida Keys Electric Cooperative Assoc.	Dennis Minton	Affirmative	
1	Gainesville Regional Utilities	Luther E. Fair	Affirmative	
1	Georgia Transmission Corporation	Harold Taylor, II	Abstain	
1	Great River Energy	Gordon Pietsch	Affirmative	
1	Hydro One Networks, Inc.	Ajay Garg	Affirmative	
1	Idaho Power Company	Ronald D. Schellberg		
1	ITC Transmission	Elizabeth Howell	Affirmative	
1	JEA	Ted E Hobson		
1	Kansas City Power & Light Co.	Michael Gammon	Affirmative	
1	Keys Energy Services	Stan T. Rzad	Affirmative	
1	Lakeland Electric	Larry E Watt	Affirmative	
1	Lincoln Electric System	Doug Bantam	Affirmative	
1	Long Island Power Authority	Jonathan Appelbaum	Affirmative	
1	Manitoba Hydro	Michelle Rheault	Affirmative	
1	MEAG Power	Danny Dees	Affirmative	
1	MidAmerican Energy Co.	Terry Harbour	Affirmative	
1	National Grid	Saurabh Saksena	Affirmative	
1	New York State Electric & Gas Corp.	Henry G. Masti	Affirmative	
1	Northeast Utilities	David H. Boguslawski	Affirmative	
1	Northern Indiana Public Service Co.	Kevin M Largura	Affirmative	
1	NorthWestern Energy	John Canavan	Affirmative	
1	Ohio Valley Electric Corp.	Robert Mattey	Affirmative	
1	Oklahoma Gas and Electric Co.	Marvin E VanBebber	Affirmative	
1	Omaha Public Power District	Lorees Tadros		
1	Orlando Utilities Commission	Brad Chase	Abstain	
1	Otter Tail Power Company	Lawrence R. Larson	Affirmative	
1	PacifiCorp	Mark Sampson	Affirmative	
1	Platte River Power Authority	John C. Collins	Affirmative	
1	Potomac Electric Power Co.	Richard J Kafka	Affirmative	
1	PowerSouth Energy Cooperative	Larry D. Avery	Negative	
1	PPL Electric Utilities Corp.	Brenda L Truhe	Affirmative	
1	Progress Energy Carolinas	Sammy Roberts	Affirmative	
1	Public Service Electric and Gas Co.	Kenneth D. Brown	Affirmative	
1	Puget Sound Energy, Inc.	Catherine Koch	Affirmative	
1	Sacramento Municipal Utility District	Tim Kelley	Affirmative	
1	Salt River Project	Robert Kondziolka	Affirmative	
1	San Diego Gas & Electric	Linda Brown	Affirmative	
1	Santee Cooper	Terry L. Blackwell	Affirmative	
1	SCE&G	Henry Delk, Jr.	Negative	
1	Seattle City Light	Pawel Krupa	Affirmative	
1	Sierra Pacific Power Co.	Rich Salgo	Affirmative	
1	Southern California Edison Co.	Dana Cabbell	Affirmative	
1	Southern Company Services, Inc.	Horace Stephen Williamson	Affirmative	
1	Southwest Transmission Cooperative, Inc.	James L. Jones	Affirmative	
1	Southwestern Power Administration	Gary W Cox	Affirmative	
1	Tampa Electric Co.	Thomas J. Szelistowski	Negative	
1	Tri-State G & T Association, Inc.	Keith V. Carman	Affirmative	
1	Westar Energy	Allen Klassen	Affirmative	
1	Western Area Power Administration	Brandy A Dunn	Affirmative	

1	Xcel Energy, Inc.	Gregory L Pieper	Affirmative	
2	Alberta Electric System Operator	Jason L. Murray	Affirmative	
2	BC Transmission Corporation	Faramarz Amjadi	Affirmative	
2	Electric Reliability Council of Texas, Inc.	Chuck B Manning	Negative	
2	Florida Municipal Power Pool	Thomas E Washburn	Affirmative	
2	Independent Electricity System Operator	Kim Warren	Affirmative	View
2	ISO New England, Inc.	Kathleen Goodman	Affirmative	
2	Midwest ISO, Inc.	Jason L Marshall	Affirmative	
2	New Brunswick System Operator	Alden Briggs	Affirmative	
2	New York Independent System Operator	Gregory Campoli		
2	PJM Interconnection, L.L.C.	Tom Bowe	Affirmative	
2	Southwest Power Pool	Charles H Yeung	Affirmative	View
3	Alabama Power Company	Bobby Kerley	Affirmative	
3	Ameren Services	Mark Peters	Affirmative	
3	American Electric Power	Raj Rana	Affirmative	
3	Atlantic City Electric Company	James V. Petrella	Affirmative	
3	BC Hydro and Power Authority	Pat G. Harrington	Affirmative	
3	Black Hills Power	Andy Butcher	Affirmative	
3	Bonneville Power Administration	Rebecca Berdahl	Affirmative	
3	Central Lincoln PUD	Steve Alexanderson	Affirmative	
3	City of Bartow, Florida	Matt Culverhouse	Affirmative	
3	City of Clewiston	Lynne Mila	Affirmative	
3	City of Farmington	Linda R. Jacobson	Affirmative	
3	City of Green Cove Springs	Gregg R Griffin	Affirmative	
3	Consolidated Edison Co. of New York	Peter T Yost	Affirmative	
3	Constellation Energy	Carolyn Ingersoll	Affirmative	
3	Consumers Energy	David A. Lapinski	Affirmative	
3	Cowlitz County PUD	Russell A Noble	Affirmative	
3	CPS Energy	Edwin Les Barrow		
3	Delmarva Power & Light Co.	Michael R. Mayer	Affirmative	
3	Detroit Edison Company	Kent Kujala	Affirmative	
3	Dominion Resources, Inc.	Jalal (John) Babik	Affirmative	
3	Duke Energy Carolina	Henry Ernst-Jr	Negative	View
3	Entergy Services, Inc.	Matt Wolf	Affirmative	
3	FirstEnergy Solutions	Kevin Querry	Affirmative	View
3	Florida Municipal Power Agency	Joe McKinney	Affirmative	
3	Florida Power & Light Co.	W. R. Schoneck	Abstain	
3	Florida Power Corporation	Lee Schuster	Abstain	
3	Gainesville Regional Utilities	Kenneth Simmons	Affirmative	
3	Georgia Power Company	Anthony L Wilson	Affirmative	
3	Georgia System Operations Corporation	R Scott S. Barfield-McGinnis	Abstain	
3	Grays Harbor PUD	Wesley W Gray	Affirmative	
3	Great River Energy	Sam Kokkinen	Affirmative	
3	Gulf Power Company	Gwen S Frazier	Affirmative	
3	Hydro One Networks, Inc.	Michael D. Penstone	Affirmative	
3	JEA	Garry Baker	Affirmative	
3	Kansas City Power & Light Co.	Charles Locke	Affirmative	
3	Kissimmee Utility Authority	Gregory David Woessner	Affirmative	
3	Lakeland Electric	Mace Hunter	Affirmative	
3	Lincoln Electric System	Bruce Merrill	Affirmative	
3	Louisville Gas and Electric Co.	Charles A. Freibert	Affirmative	
3	Manitoba Hydro	Greg C Parent	Affirmative	
3	MEAG Power	Steven Grego	Abstain	
3	MidAmerican Energy Co.	Thomas C. Mielnik	Affirmative	
3	Mississippi Power	Don Horsley	Affirmative	
3	Municipal Electric Authority of Georgia	Steven M. Jackson		
3	New York Power Authority	Marilyn Brown	Affirmative	
3	Niagara Mohawk (National Grid Company)	Michael Schiavone	Affirmative	
3	Northern Indiana Public Service Co.	William SeDoris	Affirmative	
3	Ocala Electric Utility	David T. Anderson	Affirmative	
3	Orlando Utilities Commission	Ballard Keith Mutters	Affirmative	
3	PacifiCorp	John Apperson	Affirmative	
3	Platte River Power Authority	Terry L Baker	Affirmative	
3	Potomac Electric Power Co.	Robert Reuter	Affirmative	
3	Progress Energy Carolinas	Sam Waters	Affirmative	
3	Public Service Electric and Gas Co.	Jeffrey Mueller	Affirmative	
3	Public Utility District No. 2 of Grant County	Greg Lange	Affirmative	

3	Sacramento Municipal Utility District	James Leigh-Kendall	Affirmative	
3	Salt River Project	John T. Underhill	Affirmative	
3	San Diego Gas & Electric	Scott Peterson		
3	Santee Cooper	Zack Dusenbury	Affirmative	
3	Seattle City Light	Dana Wheelock	Affirmative	
3	South Carolina Electric & Gas Co.	Hubert C. Young	Affirmative	
3	Southern California Edison Co.	David Schiada	Affirmative	
3	Tampa Electric Co.	Ronald L Donahey	Negative	
3	Wisconsin Electric Power Marketing	James R. Keller	Affirmative	
3	Xcel Energy, Inc.	Michael Ibold	Affirmative	
4	Alliant Energy Corp. Services, Inc.	Kenneth Goldsmith	Affirmative	
4	City of Clewiston	Kevin McCarthy	Affirmative	
4	City of New Smyrna Beach Utilities Commission	Timothy Beyrle	Affirmative	
4	Consumers Energy	David Frank Ronk	Affirmative	
4	Detroit Edison Company	Daniel Herring	Affirmative	
4	Florida Municipal Power Agency	Frank Gaffney	Affirmative	
4	Fort Pierce Utilities Authority	Thomas W. Richards	Affirmative	
4	Georgia System Operations Corporation	Guy Andrews	Abstain	
4	Integrys Energy Group, Inc.	Christopher Plante	Abstain	
4	Madison Gas and Electric Co.	Joseph G. DePoorter	Abstain	
4	Northern California Power Agency	Fred E. Young	Affirmative	
4	Ohio Edison Company	Douglas Hohlbaugh	Affirmative	View
4	Old Dominion Electric Coop.	Mark Ringhausen	Affirmative	
4	Public Utility District No. 1 of Douglas County	Henry E. LuBean	Affirmative	
4	Sacramento Municipal Utility District	Mike Ramirez	Affirmative	
4	Seattle City Light	Hao Li	Affirmative	
4	Seminole Electric Cooperative, Inc.	Steven R Wallace		
4	Wisconsin Energy Corp.	Anthony Jankowski	Affirmative	
5	AEP Service Corp.	Brock Ondayko	Affirmative	
5	Amerenue	Sam Dwyer	Affirmative	
5	Avista Corp.	Edward F. Groce	Abstain	
5	Black Hills Corp	George Tatar	Affirmative	
5	Bonneville Power Administration	Francis J. Halpin	Affirmative	
5	City of Tallahassee	Alan Gale	Affirmative	
5	City Water, Light & Power of Springfield	Karl E. Kohlrus	Affirmative	
5	Colmac Clarion/Piney Creek LP	Harvie D. Beavers	Affirmative	
5	Consolidated Edison Co. of New York	Edwin Thompson	Affirmative	
5	Consumers Energy	James B Lewis	Affirmative	
5	Covanta Energy	Samuel Cabassa		
5	Dairyland Power Coop.	Warren Schaefer	Affirmative	
5	Detroit Edison Company	Ronald W. Bauer	Affirmative	
5	Dominion Resources, Inc.	Mike Garton	Affirmative	
5	Duke Energy	Robert Smith	Negative	
5	Entergy Corporation	Stanley M Jaskot	Affirmative	
5	FirstEnergy Solutions	Kenneth Dresner	Affirmative	View
5	Florida Municipal Power Agency	David Schumann	Affirmative	
5	Great River Energy	Cynthia E Sulzer	Affirmative	
5	JEA	Donald Gilbert	Abstain	
5	Kansas City Power & Light Co.	Scott Heidtbrink	Affirmative	
5	Kissimmee Utility Authority	Mike Blough	Affirmative	
5	Lakeland Electric	Thomas J Trickey	Affirmative	
5	Lincoln Electric System	Dennis Florom	Affirmative	
5	Louisville Gas and Electric Co.	Charlie Martin	Affirmative	
5	Manitoba Hydro	Mark Aikens	Affirmative	
5	New York Power Authority	Gerald Mannarino		
5	NextEra Energy Resources, LLC	Benjamin Church		
5	Northern Indiana Public Service Co.	Michael K Wilkerson	Affirmative	
5	Orlando Utilities Commission	Richard Kinas		
5	PacifiCorp	Sandra L. Shaffer	Abstain	
5	Portland General Electric Co.	Gary L Tingley		
5	PowerSouth Energy Cooperative	Tim Hattaway	Negative	
5	PPL Generation LLC	Mark A Heimbach	Affirmative	
5	Progress Energy Carolinas	Wayne Lewis	Affirmative	
5	PSEG Power LLC	David Murray	Affirmative	
5	Reedy Creek Energy Services	Bernie Budnik	Affirmative	
5	RRI Energy	Thomas J. Bradish	Affirmative	

5	Sacramento Municipal Utility District	Bethany Wright	Affirmative	
5	Salt River Project	Glen Reeves	Affirmative	
5	Seattle City Light	Michael J. Haynes	Affirmative	
5	Seminole Electric Cooperative, Inc.	Brenda K. Atkins		
5	South California Edison Company	Ahmad Sanati		
5	South Carolina Electric & Gas Co.	Richard Jones	Affirmative	
5	Tenaska, Inc.	Scott M. Helyer	Affirmative	
5	U.S. Army Corps of Engineers Northwestern Division	Karl Bryan	Affirmative	
5	U.S. Bureau of Reclamation	Martin Bauer P.E.	Abstain	
5	Wisconsin Electric Power Co.	Linda Horn	Affirmative	
5	Wisconsin Public Service Corp.	Leonard Rentmeester		
5	Xcel Energy, Inc.	Liam Noailles	Affirmative	
6	AEP Marketing	Edward P. Cox	Affirmative	
6	Ameren Energy Marketing Co.	Jennifer Richardson	Affirmative	
6	Black Hills Corp	Tyson Taylor		
6	Bonneville Power Administration	Brenda S. Anderson	Affirmative	
6	Consolidated Edison Co. of New York	Nickesha P Carrol	Affirmative	
6	Constellation Energy Commodities Group	Chris Lyons	Affirmative	
6	Dominion Resources, Inc.	Louis S Slade	Affirmative	
6	Duke Energy Carolina	Walter Yeager	Negative	
6	Entergy Services, Inc.	Terri F Benoit	Affirmative	
6	Eugene Water & Electric Board	Daniel Mark Bedbury	Affirmative	
6	FirstEnergy Solutions	Mark S Travaglianti	Affirmative	View
6	Florida Municipal Power Agency	Richard L. Montgomery	Affirmative	
6	Florida Power & Light Co.	Silvia P Mitchell		
6	Great River Energy	Donna Stephenson	Affirmative	
6	Kansas City Power & Light Co.	Thomas Saitta	Affirmative	
6	Lakeland Electric	Paul Shipps	Affirmative	
6	Lincoln Electric System	Eric Ruskamp	Affirmative	
6	Louisville Gas and Electric Co.	Daryn Barker	Affirmative	
6	Manitoba Hydro	Daniel Prowse	Affirmative	
6	New York Power Authority	Thomas Papadopoulos	Affirmative	
6	Northern Indiana Public Service Co.	Joseph O'Brien	Affirmative	
6	Omaha Public Power District	David Ried	Affirmative	
6	PacifiCorp	Gregory D Maxfield	Affirmative	
6	Progress Energy	James Eckelkamp	Affirmative	
6	PSEG Energy Resources & Trade LLC	James D. Hebson	Affirmative	
6	Public Utility District No. 1 of Chelan County	Hugh A. Owen	Affirmative	
6	RRI Energy	Trent Carlson	Affirmative	
6	Salt River Project	Mike Hummel	Affirmative	
6	Santee Cooper	Suzanne Ritter	Affirmative	
6	Seattle City Light	Dennis Sismaet	Affirmative	
6	Seminole Electric Cooperative, Inc.	Trudy S. Novak		
6	Southern California Edison Co.	Marcus V Lotto	Affirmative	
6	SunGard Data Systems	Christopher K Heisler	Affirmative	
6	Western Area Power Administration - UGP Marketing	John Stonebarger	Affirmative	
6	Xcel Energy, Inc.	David F. Lemmons	Affirmative	
8		James A Maenner	Affirmative	
8		Roger C Zaklukiewicz	Affirmative	
8		Edward C Stein	Abstain	
8	JDRJC Associates	Jim D. Cyrulewski	Affirmative	
8	Power Energy Group LLC	Peggy Abbadini		
8	Volkmann Consulting, Inc.	Terry Volkmann	Affirmative	
9	California Energy Commission	William Mitchell Chamberlain	Affirmative	
9	Commonwealth of Massachusetts Department of Public Utilities	Donald E. Nelson	Affirmative	
9	Maine Public Utilities Commission	Jacob A McDermott	Abstain	
9	Utah Associated Municipal Power Systems	Tom Florence	Negative	
10	Electric Reliability Council of Texas, Inc.	Kent Saathoff	Negative	View
10	Florida Reliability Coordinating Council	Linda Campbell	Abstain	
10	Midwest Reliability Organization	Dan R. Schoenecker	Affirmative	
10	New York State Reliability Council	Alan Adamson	Affirmative	
10	Northeast Power Coordinating Council, Inc.	Guy V. Zito	Affirmative	
10	ReliabilityFirst Corporation	Jacquie Smith		
10	SERC Reliability Corporation	Carter B Edge	Affirmative	
10	Western Electricity Coordinating Council	Louise McCarren	Affirmative	

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Standards Announcement

Final Ballot Results for Three Interpretations

Now available at: https://standards.nerc.net/Ballots.aspx

Recirculation Ballots for the following interpretations have closed and all three interpretations were approved by their associated ballot pools.

Project 2008-09 – Interpretation of EOP-001-0 Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers

The recirculation ballot for this interpretation ended October 14, 2010. Voting statistics are listed below, and the Ballot Results Web page provides a link to the detailed results:

Quorum: 88.11%
Approval: 99.14%

The request and interpretation can be found on the project page:
http://www.nerc.com/filez/standards/EOP-001-0_Interpretation_RECM.html

Project 2009-28 – Interpretation of EOP-001-1, EOP-001-2 – Emergency Operations Planning for the Florida Municipal Power Pool

The recirculation ballot for this interpretation ended October 15, 2010. Voting statistics are listed below, and the Ballot Results Web page provides a link to the detailed results:

Quorum: 92.19%
Approval: 94.78%

The request and interpretation can be found on the project page:
http://www.nerc.com/filez/standards/Project2009-28_EOP-001-1-2_R2.2_FMPP.html

Project 2009-27 – Interpretation of TOP-002-2a – Normal Operations Planning for the Florida Municipal Power Pool

The recirculation ballot for this interpretation ended October 16, 2010. Voting statistics are listed below, and the Ballot Results Web page provides a link to the detailed results:

Quorum: 91.21%
Approval: 93.44%

The request and interpretation can be found on the project page:
http://www.nerc.com/filez/standards/Project2009-27_TOP-002-2a_R10_RFI_FMPP.html

Next Steps
All three interpretations will be presented to the Board of Trustees for approval.

Standards Process
The Standard Processes Manual contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

For more information or assistance, please contact Monica Benson, Standards Process Administrator, at monica.benson@nerc.net or at 609.452.8060.

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Exhibit E

Roster of the Interpretation Drafting Team for the Interpretation of Requirement R10 of TOP-002-2a — Normal Operations Planning.

Project 2009-27

Interpretation of TOP-002-2a R10

Name and Title Affiliation Contact Info	Bio
James S. Case Director of Weekly Operations Drafting Team Chair Entergy Services, Inc 6540 Watkins Drive Jackson, MS 392139201 Business : (601) 985-2345 Cell: (601) 594-6736 JCASE@entergy.com	Jim Case was named director of weekly operations in June 2008. Immediately prior to being named to this position, Case served in transmission operations as manager of transmission system security. As director of weekly operations, Case is responsible for the design, implementation and maintenance of procedures and processes necessary to ensure compliance with Entergy's transmission tariff on file with the Federal Energy Regulatory Commission that governs Entergy's weekly procurement process. Case has over thirty-eight years of electric utility experience, most recently in transmission operations. He has experience in all phases of transmission and distribution, including field engineering, construction management, distribution standards and bulk power operations. He currently directs a group that performs security-constrained unit commitment including independent offers on a week-ahead basis for Entergy. In addition to his previous assignment in transmission operations, he has served as manager of transmission security coordination. He has served as a staff engineer in distribution standards, and district engineer in the south-central district of Entergy Mississippi. Before joining Entergy, Case worked for the Union Carbide Nuclear Division and Gulf Power Company. Case is active nationally in NERC. He is a member of the NERC Operating Committee, Chair of the SERC Operating Committee, Chair of the NERC Real Time Operations Standards Drafting Team, member of the Reliability Coordination Standards Drafting Team, member of the Interconnected Reliable Operations Standards Drafting Team, a past member of the Version 0 Standards Drafting Team, the Reliability Coordination Working Group, the Congestion Management Working Group, and the ANSI C62 working group concerned with surge arrester standards. He has a bachelor's degree in electrical engineering from Mississippi State University and a master's degree in business administration from the University of Arkansas at Little Rock. Case is a senior member of Institute of Electrical and Electronics Engineers, Inc., member of the Power Engineering Society and is a registered professional engineer in Mississippi. Case is a member of Eta Kappa Nu, Tau Beta Pi, Beta Gamma Sigma and Alpha Epsilon Lambda.
Paul Bleuss Shift Manager CISO 250 Outcropping Way Folsom, CA 95630 Business : (916) 608-5859 Cell: (916) 802-4132 pbleuss@caiso.com	Paul has been in the electrical industry for 26 years. Experience includes: Power Plant startup, testing, commissioning, and operations. Additionally, he has experience in Substation commissioning, testing, and operations, as well as System Dispatch – Interconnected System Operations. Paul is currently a Shift Manager at the California ISO. He is responsible for the safe, reliable, and compliant operations of the CISO BA and TOP area in both real-time and day ahead environments. Prior positions at the CISO include: Operations Compliance Lead. Responsible for monitoring and analyzing the real-time and day ahead operations of the CISO BA and TOP functions. Paul submits self-reports and mitigation plans as required. Generation Dispatcher - Responsible for the CISO BA functions. Transmission Dispatcher - Responsible for the CISO TOP functions. Paul is a Real-Time scheduler and is responsible for all aspects of interchange scheduling. For 6 years Paul was a WECC Reliability Coordinator for the California/Mexico sub-region of WECC, the last 3 years of which was in a lead capacity. He was responsible for monitoring power flows and reserves in the sub-region to ensure WECC/MORC criteria compliance, and for evaluating current and schedule outages for potential impacts on the WECC/sub-region. Paul assists Control Area Shift Managers to ensure MORC/WECC policy/procedure compliance. He conducts Real-Time and next day contingence analysis studies. He also directs System Operations as required. Prior to the CISO and WECC Paul worked for the Northern California Power Agency. His responsibilities included: New Power Plant startup/commissioning (Operator/Technician) Power Plant/Substation operations and testing (Operator/Technician) System Dispatcher (Real-time and Relief)
H. Steven Myers	Steve Myers, Principal, Operating & Planning Standards at the Electric Reliability Council

Principal, Operating & Planning Standards Electric Reliability Council of Texas, Inc. 2705 West Lake Drive Taylor, TX 76574 Business: (512) 248-3077 smyers@ercot.com	of Texas (ERCOT), has over forty-two years of electric system operations experience. Mr. Myers first joined ERCOT in 1996 as the Security Center Manager at the inception of the ERCOT Independent System Operator (ISO). During his time at ERCOT, he has served as Security Center Manager, Manager of System Operations, Manager of Operations Support, Manager of Operating Standards, and now as Principal, Operating & Planning Standards. Prior to joining ERCOT, Mr. Myers served as Manager of the North Texas Security Center. He also served as Operations Supervisor and as Supervisor of Operations Engineering for an investor-owned electric utility; including generation and transmission operations. As a more junior engineer, he served as an engineer in electrical distribution, with responsibilities including supervision of a transformer repair shop, supervision of an underground network group, and as an operations engineer at the system control center. Mr. Myers is a graduate of New Mexico State University, with a Bachelor of Science in Electrical Engineering (BSEE). He has a Master of Business Administration (MBA) degree in Management from the University of Texas at Arlington, and is a Registered Professional Engineer in the State of Texas. Mr. Myers served as an officer in the U. S. Naval Reserve as an Assistant Resident Officer in Charge of Construction in San Diego, California. His electrical engineering training enabled his oversight of all contracts for electrical systems on all bases in the San Diego area. He also gained experience with oversight of contracts of every nature on three assigned Navy bases in the area.
Jason Marshall Technical Manager, Standards Compliance and Strategy Midwest ISO, Inc. 701 City Center Drive Carmel, IN 46082 Business : (317) 249-5494 jmarshall@midwestiso.org	Jason L. Marshall is a Technical Manager at the Midwest ISO responsible for participation in the Electric Reliability Organization and regional standards development processes. An additional responsibility is coordinating and tracking company compliance activities. Jason joined the Midwest ISO in 2001 as a Senior EMS Engineer. Since then he has performed roles of increasing responsibility including Principal and Lead Engineer. Jason's prior career includes service with Duke Energy and the MidAmerican Interconnected Network (MAIN) in Lombard, Illinois, where he was a Reliability Coordinator in MAIN's Coordination Center. Jason earned a Bachelor of Science degree in Electrical Engineering from Rose-Hulman Institute of Technology, a Master of Science degree in Electrical Engineering from Clemson University, and an MBA from the University of Indianapolis. He is a Registered Professional Engineer in North Carolina and Indiana and is a NERC-Certified System Operator in Reliability.
Al DiCaprio PJM Interconnection, L.L.C. 955 Jefferson Ave. Norristown, PA 19403 Business: (610) 666-8854 dicapram@pjm.com	Al has been employed by PJM since 1970. His experience at PJM includes System Operations Department in which he helped developed PJM generation control program, PJM's Accounting for regulation program and PJM's Fuel Supply Emergency procedures. In the System Performance Department he initiated performance monitoring and benchmarking programs, and PJM's Energy by Fuel type tracking system. He also helped launch PJM's first retail customer support program. As Senior Strategist, Al provides analysis and support for PJM positions on NERC standards and FERC initiatives. Al has served on various NERC committees, most notably as Chairman of the Performance Subcommittee when the first Control Performance Standard was approved. He also served on the Task Force whose efforts led to the development of the NERC Functional Model. Al serves as the chairman of the ISO/RTO's Standards Review Committee who review and comment on NERC Reliability Standards, NAESB Business Practices, and FERC initiatives related to Reliability Standards. Active in the IEEE, he is a senior member and has published various papers and has served on Technical Activities committees for two Joint IEEE-CIGRE conferences. Internationally, Al serves as the chairman of the International Group on Comparison of Transmission Operation Practices. Al has been part of CIGRE's initiative into Energy Markets and has been active with Study Committee C5 (Markets and Regulation) since its beginning in 2000 and received the CIGRE 2009 Technical Committee Award for his contributions to the Study Committee. He is also active in a Joint Working Group with Markets and Operations, and Working groups on System Design (WG C5-7) and on Integration of Renewable resources and Demand-side Management (WG C5-11). He has a Bachelor's degree in electrical engineering from Drexel University in Philadelphia and a Master's degree in System Operations from the University of Pennsylvania.

Al McMeekin Standards Development Coordinator **NERC Staff** North American Electric Reliability Corporation 116-390 Village Boulevard Princeton, New Jersey 08540-5721 (803) 530-1963 al.mcmeekin@nerc.net	Al McMeekin is the NERC Staff Coordinator for this interpretation response development team. Prior to joining NERC in 2009, Mr. McMeekin worked at South Carolina Electric & Gas Company (SCE&G) for 29 years with various assignments in engineering and operations within the Distribution and Transmission Groups. In Transmission Operations Planning, Mr. McMeekin was the lead engineer responsible for: providing the day ahead and real-time operational plans to System Control; overseeing the monthly transmission billing functions and inadvertent checkout; administering the SCE&G OATT and developing business practices; participating in SCE&G's ERO Working Group to ensure compliance with NERC standards; and representing SCE&G on various national, regional, and subregional groups. Mr. McMeekin was a member of the SERC Operating Committee and served as Chair of the SERC Operations Planning Subcommittee. He was a member of the SERC Standards Committee and the SERC Available Transfer Capability Working Group. He also served as Chair of the VACAR South Reliability Coordinator Procedures Working Group and was a member of NERC's System Restoration and Blackstart Standards Drafting Team. Al is a graduate of Clemson University and is a licensed Professional Engineer in the states of South Carolina and Georgia.