UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation	**)** **)**	**Docket No. RD13-_____**

PETITION OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION FOR APPROVAL OF THE NERC GLOSSARY TERMS "BULK-POWER SYSTEM," "RELIABLE OPERATION" AND "RELIABILITY STANDARD"

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Counsel for the North American Electric Reliability Corporation

May 10, 2013

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UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation	**)** **)**	**Docket No. RD13-_____**

PETITION OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION FOR APPROVAL OF DEFINITIONS IN THE NERC GLOSSARY OF TERMS USED IN RELIABILITY STANDARDS

Pursuant to Section 215(d)(1) of the Federal Power Act ("FPA")[1] and Section 39.5[2] of the Federal Energy Regulatory Commission's ("FERC" or "Commission") regulations, the North American Electric Reliability Corporation ("NERC")[3] hereby submits for Commission approval the proposed terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" for inclusion in the NERC *Glossary of Terms Used in Reliability Standards* ("NERC Glossary") in compliance with Order No. 693.[4]

I. EXECUTIVE SUMMARY

In Order No. 693, the Commission noted that the terms defined in the NERC Glossary have an important role in establishing consistent understanding of the Reliability Standards Requirements and implementation.[5] The NERC Glossary provides continuity in the application of the glossary definitions industry-wide and eliminates multiple interpretations of the same term

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1 16 U.S.C. § 824o (2006).

2 18 C.F.R. § 39.5 (2012).

3 The Commission certified NERC as the electric reliability organization ("ERO") in accordance with Section 215 of the FPA on July 20, 2006. *N. Amer. Elec. Reliability Corp.*, 116 FERC ¶ 61,062 (2006).

4 *See Mandatory Reliability Standards for the Bulk-Power System*, Order No. 693, FERC Stats. & Regs. ¶ 31,242 at P 1894, *order on reh'g*, Order No. 693-A, 120 FERC ¶ 61,053 (2007)("The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard.").

5 Order No. 693 at P 1894.

or function, which could otherwise create miscommunication or jeopardize reliability. The NERC Glossary is updated through the Reliability Standards development process whenever a new or revised Reliability Standard that includes a new defined term is approved, or as needed. In Order No. 693, the Commission directed NERC to modify the NERC Glossary to include statutory definitions of the terms "Bulk-Power System," "Reliable Operation" and "Reliability Standard."[6] The instant petition is submitted in compliance with that directive.

There is significant overlap amongst the proposed terms as the section 215 definition of the terms "Reliable Operation" and "Reliability Standard" include the section 215 defined term "Bulk-Power System," and the section 215 definition of the term "Reliability Standard" also includes the term "Reliable Operation."[7]

Consistent with NERC's international status, slight modifications to the statutory definitions were necessary to clarify the terms "Commission" and "section" (contained in the section 215 definition of the term "Reliability Standard"). "Commission" refers to the Federal Energy Regulatory Commission in the United States and applicable governmental authorities approving, or recognizing the standard, in other jurisdictions; similarly, "section" has been replaced with "section 215 of the Federal Power Act." These minor modifications are fully consistent with section 215 and the recognized need for international agreements with the governments of Canada and Mexico to provide for effective compliance with Reliability Standards and the effectiveness of the ERO in the United States and Canada or Mexico.[8]

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[6] *Id.* The statutory definitions for these terms are in section 215 of the Federal Power Act (16 U.S.C. § 824o).

[7] *See* Section IV.

[8] *See* section 215(h).

II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the following:[9]

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III. BACKGROUND

A. Regulatory Framework

By enacting the Energy Policy Act of 2005,[10] Congress entrusted the Commission with the duties of approving and enforcing rules to ensure the reliability of the Nation's Bulk-Power System, and with the duty of certifying an ERO that would be charged with developing and enforcing mandatory Reliability Standards, subject to Commission approval. Section 215 of the

[9] Persons to be included on the Commission's service list are identified by an asterisk. NERC respectfully requests a waiver of Rule 203 of the Commission's regulations, 18 C.F.R. § 385.203 (2012), to allow the inclusion of more than two persons on the service list in this proceeding.

[10] 16 U.S.C. § 824o (2012).

FPA states that all users, owners, and operators of the Bulk-Power System in the United States will be subject to Commission-approved Reliability Standards.[11]

Section 215(d)(5) of the FPA authorizes the Commission to order the ERO to submit a new or modified Reliability Standard. Pursuant to Section 215(d)(2) of the FPA and Section 39.5(c)(1) of the Commission's regulations, the Commission will give due weight to the technical expertise of the ERO with respect to the content of a Reliability Standard. In Order No. 693, the Commission noted that it would defer to the "technical expertise" of the ERO with respect to the content of a Reliability Standard and explained that, through the use of directives, it provides guidance but does not dictate an outcome. Rather, the Commission will consider an equivalent alternative approach provided that the ERO demonstrates that the alternative will address the Commission's underlying concern or goal as efficiently and effectively as the Commission's proposal, example, or directive.[12]

Section 39.5(a) of the Commission's regulations requires the ERO to file with the Commission for its approval each Reliability Standard that the ERO proposes to become mandatory and enforceable in the United States, and each modification to a Reliability Standard that the ERO proposes to be made effective. The Commission has the regulatory responsibility to approve standards that protect the reliability of the Bulk-Power System and to ensure that such standards are just, reasonable, not unduly discriminatory or preferential, and in the public interest.

---

[11] *See* Section 215(b)(1)("All users, owners and operators of the bulk-power system shall comply with reliability standards that take effect under this section.").

[12] *See Mandatory Reliability Standards for the Bulk-Power System*, Order No. 693, FERC Stats. & Regs. ¶ 31,242 at PP 31, 186-187, *order on reh'g*, Order No. 693-A, 120 FERC ¶ 61,053 (2007).

B. NERC Reliability Standards Development Procedure

The proposed NERC Glossary terms were developed in an open and fair manner and in accordance with the Commission-approved Reliability Standard development process.[13] NERC develops Reliability Standards and NERC Glossary terms in accordance with Section 300 (Reliability Standards Development) of its Rules of Procedure and the NERC Standard Processes Manual.[14] In its ERO Certification Order, the Commission found that NERC's proposed rules provide for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests in developing Reliability Standards and thus satisfies certain of the criteria for approving Reliability Standards. The development process is open to any person or entity with a legitimate interest in the reliability of the Bulk-Power System. NERC considers the comments of all stakeholders, and a vote of stakeholders and the NERC Board of Trustees is required to approve a NERC Glossary term before the term is submitted to the Commission for approval.

IV. JUSTIFICATION FOR APPROVAL

A. Basis for Approval of Proposed Term "Bulk-Power System"

The term "Bulk-Power System" is defined in section 215 of the FPA as follows:

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[13] Order No. 672 at P 334 ("Further, in considering whether a proposed Reliability Standard meets the legal standard of review, we will entertain comments about whether the ERO implemented its Commission-approved Reliability Standard development process for the development of the particular proposed Reliability Standard in a proper manner, especially whether the process was open and fair. However, we caution that we will not be sympathetic to arguments by interested parties that choose, for whatever reason, not to participate in the ERO's Reliability Standard development process if it is conducted in good faith in accordance with the procedures approved by FERC.").

[14] The NERC Rules of Procedure are available here: http://www.nerc.com/page.php?cid=1%7C8%7C169. The current NERC Standard Processes Manual is available here: http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf.

> (1) The term '**bulk-power system'** means—
>
> > (A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and
> >
> > (B) electric energy from generation facilities needed to maintain transmission system reliability.
>
> The term does not include facilities used in the local distribution of electric energy.

The proposed definition of the term "Bulk-Power System" for inclusion in the NERC Glossary is as follows:

> **"Bulk-Power System"** means, (A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

The proposed definition of "Bulk-Power System" is identical to the definition in section 215 of the FPA and should therefore be accepted in compliance with the Commission's directive in Order No. 693.

B. Basis for Approval of Proposed Term "Reliable Operation"

The term "Reliable Operation" is defined in section 215 of the FPA as follows:

> (4) The term '**reliable operation'** means operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.

The proposed definition of the term "Reliable Operation" for inclusion in the NERC Glossary is as follows:

> "**Reliable Operation"** means operating the elements of the Bulk-Power System within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not

> occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.

The proposed definition of "Reliable Operation" is identical to the definition in section 215 of the FPA (although "Bulk-Power System" is capitalized to reflect the fact that it is also a defined term) and should therefore be accepted in compliance with the Commission's directive in Order No. 693.[15]

C. Basis for Approval of Proposed Term "Reliability Standard"

The term "Reliability Standard" is defined in section 215 of the FPA as follows:

> (3) The term '**reliability standard**' means a requirement, approved by the Commission under this section, to provide for reliable operation of the bulk-power system. The term includes requirements for the operation of existing bulk-power system facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the bulk-power system, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.

The proposed definition of the term "Reliability Standard" for inclusion in the NERC Glossary is as follows:

> **"Reliability Standard"** means a requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for Reliable Operation of the Bulk-Power System. The term includes requirements for the operation of existing Bulk-Power System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for Reliable Operation of the Bulk-Power System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.

[15] Order No. 693 at P 1894.

As noted herein, the proposed definition of "Reliability Standard" is substantively identical to the definition in section 215 of the FPA, although the terms "Bulk-Power System" and "Reliable Operation" are capitalized to reflect the fact that they are defined terms and slight modifications were necessary to clarify the terms "Commission" and "section" (contained in the section 215 definition of the term "Reliability Standard"). "Commission" refers to the Federal Energy Regulatory Commission in the United States and applicable governmental authorities approving, or recognizing the standard, in other jurisdictions; similarly, "section" has been replaced with "section 215 of the Federal Power Act."

These minor modifications are fully consistent with section 215 and the recognized need for international agreements with the governments of Canada and Mexico to provide for effective compliance with Reliability Standards and the effectiveness of the ERO in the United States and Canada or Mexico.[16] For these reasons, the proposed definition of "Reliability Standard" should be accepted in compliance with the Commission's directive in Order No. 693.[17]

V. SUMMARY OF THE RELIABILITY STANDARD DEVELOPMENT PROCEEDINGS

A. Standard Authorization Request Development

On May 10, 2012, the Standards Committee authorized the posting of a Standard Authorization Request ("SAR") for adding the statutory definitions of "Bulk-Power System," "Reliability Standard," and "Reliable Operation" to the NERC Glossary for a 45-day comment period.

[16] *See* section 215(h).
[17] Order No. 693 at P 1894.

B. First Posting – Formal Comment and Initial Ballot

The proposed terms were posted for a 45-day formal comment period and initial ballot from June 19, 2012 through August 2, 2012. The initial ballot was conducted during the final 10 days of the formal comment period, from July 24, 2012 to August 2, 2012. The initial ballot was unsuccessful largely due to the fact that the definitions posted did not match the statutory language of the Federal Power Act. Instead the definitions matched the Rules of Procedure definitions for the three terms, and the weighted segment vote for the definitions was only 54.16%.

C. Second Posting – Formal Comment and Successive Ballot

The proposed NERC Glossary terms were posted for a formal comment period and a successive ballot from February 21, 2013 to March 22, 2013. The successive ballot was during the final 10 days of the comment period from March 13, 2012 to March 22, 2013. The Glossary terms passed with an approval vote of 84.27%.

D. Third Posting – Recirculation Ballot

The proposed NERC Glossary terms were posted for a recirculation ballot from April 18, 2013 to April 29, 2013. The Glossary terms passed with an approval of 88.15%.

E. Board of Trustees Approval

The NERC Board of Trustees approved the proposed Glossary terms on May 9, 2013.

VI. CONCLUSION

For the reasons set forth above, NERC respectfully requests that the Commission approve the proposed NERC Glossary terms included in **Exhibit A**.

Respectfully submitted,

/s/ Stacey Tyrewala

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Counsel for the North American Electric Reliability Corporation

May 10, 2013

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 10th day of May, 2013.

/s/ Stacey Tyrewala

Stacey Tyrewala
Attorney for North American Electric Reliability Corporation

Exhibit A

Proposed NERC Glossary Terms

Exhibit A

1. "**Bulk-Power System"** means, (A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

2. "**Reliable Operation"** means operating the elements of the Bulk-Power System within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.

3. **"Reliability Standard"** means a requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for Reliable Operation of the Bulk-Power System. The term includes requirements for the operation of existing Bulk-Power System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for Reliable Operation of the Bulk-Power System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.

Exhibit B

Implementation Plan for Proposed NERC Glossary Terms

Implementation Plan
2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Requested Approvals
It is requested that the following definitions be approved for addition to the NERC Glossary of Terms used in Reliability Standards:

- "Bulk-Power System" means, A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

- "Reliability Standard" means a requirement, approved by the United States Federal Energy Regulatory Commission under this Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk-Power System]. The term includes requirements for the operation of existing bulk-power system [Bulk-Power System] facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk-Power System], but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.

- "Reliable Operation" means operating the elements of the bulk-power system [Bulk-Power System] within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.

The words "bulk-power system" are found in the definitions for "Reliability Standard" and "Reliable Operation." Also the words "reliable operation" appear in the "Reliability Standard" definition. These terms will be capitalized before the definitions are added to the Glossary, as indicated by the capitalized term in brackets. The terms are not currently capitalized or adopted because the Board of Trustees has yet to adopt them as Glossary Terms.

These definitions will apply to terms that are currently capitalized in any Reliability Standard. Where a Reliability Standard includes a non-capitalized term, capitalization will be considered during the next standards development project involving the requirement.

Requested Retirements

No Reliability Standards or definitions are requested to be retired with the approval of the addition of the definitions for Bulk-Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards.

Prerequisite Approvals

No Reliability Standard or definition is under development that must be completed or implemented before the definitions for Bulk-Power System, Reliability Standard, and Reliable Operation can be added to the NERC Glossary of Terms used in Reliability Standards.

Background

In Paragraph 1894 of the Federal Energy Regulatory Commission (FERC) Order 693, the Commission directed the Electric Reliability Organization to include the statutory definitions of Bulk-Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards:

> "1894. The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

The statutory definitions for Bulk-Power System, Reliability Standard, and Reliable Operation are contained in Section 215 of the Federal Power Act (16 U.S.C. § 824o). Inclusion of the statutory definitions for Bulk-Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms will address three outstanding Commission directives.

Effective Date

The definitions of Bulk-Power System, Reliability Standard, and Reliable Operation shall be added to the NERC Glossary of Terms used in Reliability Standards effective upon applicable regulatory approval.

Exhibit C

Consideration of Comments

Project 2012-08.1
Phase 1 of Glossary Updates: Statutory Definitions

Related Files

Status:
Adopted by the Board of Trustees on May 9, 2013 and pending regulatory approval.

Purpose/Industry Need:
To satisfy FERC Order 693, paragraph "1894 - The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

Background:
In paragraph 1894 of Federal Energy Regulatory Commission (FERC) Order 693, the Commission directed the Electric Reliability Organization to include the statutory definitions of the Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards. Inclusion of these statutory definitions in the NERC Glossary of Terms used in Reliability Standards will address these outstanding Commission directives. The proposed definitions for Bulk-Power System, Reliability Standard, and Reliable Operation are identical to the definitions found in Section 215 of the Federal Power Act.

Draft	Action	Dates	Results	Consideration of Comments
Implementation Plan Clean | Redline to Last Posted Roadmap Clean | Redline to Last Posted	Recirculation Ballot Info>> Vote>>	04/18/13 - 04/29/13 (closed)	Summary>> Ballot Results>>	
Implementation Plan Clean | Redline to Last Posted	Successive Ballot Updated Info>>	03/13/13 - 03/22/13 (closed)	Summary>> Ballot Results>>	

Roadmap Clean | Redline to Last Posted **Supporting Documents:** Unofficial Comment Form (Word)	Info>> Vote>>			
	Comment Period Info>> Submit Comments>>	02/21/13 - 03/22/13 (closed)	Comments Received>>	Consideration of Comments **(2)**
SAR Implementation Plan Roadmap (Revised: 07/11/12) **Supporting Documents:** Unofficial Comment Form (Word)	Initial Ballot Updated Info>> Info>> Vote>>	07/24/12 - 08/02/12 (closed)	Ballot Results>>	
	Info>> Submit Comments>>	06/19/12 - 08/02/12 (closed)	Comments Received>>	Consideration of Comments **(1)**
	Join Ballot Pool>>	06/19/12 - 07/18/12 (closed)		

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Consideration of Comments

Phase 1 of Glossary Updates: Statutory Definitions
Project 2012-08.1

The Project 2012-08.1 Drafting Team thanks all commenters who submitted comments on the Phase 1 of Glossary Updates: Statutory Definitions. The Phase 1 Glossary Updates were posted for a 45-day public comment period from June 19, 2012 through August 2, 2012. Stakeholders were asked to provide feedback on the Glossary Updates and associated documents through an electronic comment form. There were 60 sets of comments, including comments from approximately 159 different people from approximately 104 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's project page.

If you feel that your comment has been overlooked, 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 of Standards and Training, Mark Lauby, at 404-446-9723 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.[1]

[1] The appeals process is in the Standard Processes Manual: http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf

Index to Questions, Comments, and Responses

The Industry Segments are:

1 — Transmission Owners
2 — RTOs, ISOs
3 — Load-serving Entities
4 — Transmission-dependent Utilities
5 — Electric Generators
6 — Electricity Brokers, Aggregators, and Marketers
7 — Large Electricity End Users
8 — Small Electricity End Users
9 — Federal, State, Provincial Regulatory or other Government Entities
10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Sasa Maljukan	Hydro One	X									

	Additional Member	Additional Organization	Region	Segment Selection
1.	David Kiguel	Hydro One networks Inc.	NPCC	1

2.	Group	Guy Zito	Northeast Power Corodinating Council										X

	Additional Member	Additional Organization	Region	Segment Selection
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10
2.	Carmen Agavriloai	Independent Electricity System Operator	NPCC	2
3.	Greg Campoli	New York Independent System Operator	NPCC	2
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
5.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1
6.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10

Group/Individual	Commenter	Organization	Registered Ballot Body Segment									
			1	2	3	4	5	6	7	8	9	10
7. Mike Garton	Dominion Resources Services, Inc.	NPCC	5									
8. Kathleen Goodman	ISO - New England	NPCC	2									
9. Michael Jones	National Grid	NPCC	1									
10. David Kiguel	Hydro One Networks Inc.	NPCC	1									
11. Michael R. Lombardi	Northeast Utilities	NPCC	1									
12. Randy MacDonald	New Brunswick Power Transmission	NPCC	9									
13. Bruce Metruck	New York Power Authority	NPCC	6									
14. Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5									
15. Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10									
16. Robert Pellegrini	The United Illuminating Company	NPCC	1									
17. Si-Truc Phan	hydro-Quebec TransEnergie	NPCC	1									
18. David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5									
19. Brian Robinson	Utility Services	NPCC	8									
20. Michael Schiavone	National Grid	NPCC	1									
21. Wayne Sipperly	New York Power Authority	NPCC	5									
22. Donald Weaver	New Brunswick System Operator	NPCC	2									
23. Ben Wu	Orange and Rockland Utilities	NPCC	1									
24. Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3									
3. Group	Steve Alexanderson P.E.	Western Small Entity Comment Group			X	X					X	

	Additional Member	Additional Organization	Region	Segment Selection
1.	Eric Scott	City of Palo Alto	WECC	3
2.	Russ Schneider	Flathead Electric	WECC	3, 4
3.	Dale Dunckel	Okanogan PUD	WECC	1
4.	Ronald Sporseen	Blachly-Lane Electric Cooperative	WECC	3
5.	Ronald Sporseen	Central Electric Cooperative	WECC	3
6.	Ronald Sporseen	Clearwater Power Company	WECC	3
7.	Ronald Sporseen	Douglas Electric Cooperative	WECC	3
8.	Ronald Sporseen	Fall River Rural Electric Cooperative	WECC	3
9.	Ronald Sporseen	Northern Lights	WECC	3
10.	Ronald Sporseen	Lane Electric Cooperative	WECC	3
11.	Ronald Sporseen	Lincoln Electric Cooperative	WECC	3

Group/Individual	Commenter	Organization	Registered Ballot Body Segment									
			1	2	3	4	5	6	7	8	9	10

12.	Ronald Sporseen	Raft River Rural Electric Cooperative	WECC	3
13.	Ronald Sporseen	Lost River Electric Cooperative	WECC	3
14.	Ronald Sporseen	Salmon River Electric Cooperative	WECC	3
15.	Ronald Sporseen	Umatilla Electric Cooperative	WECC	3
16.	Ronald Sporseen	Coos-Curry Electric Cooperative	WECC	3
17.	Ronald Sporseen	West Oregon Electric Cooperative	WECC	3
18.	Ronald Sporseen	Consumers Power	WECC	1, 3
19.	Ronald Sporseen	Pacific Northwest Generating Cooperative	WECC	3, 4, 8
20.	Ronald Sporseen	Power Resources Cooperative	WECC	5

4.	Group	WILL SMITH	MRO NSRF	X	X	X	X	X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	MAHMOOD SAFI	OPPD	MRO	1, 3, 5, 6
2.	CHUCK LAWRENCE	ATC	MRO	1
3.	TOM BREENE	WPS	MRO	3, 4, 5, 6
4.	JODI JENSON	WAPA	MRO	1, 6
5.	KEN GOLDSMITH	ALTW	MRO	4
6.	ALICE IRELAND	XCEL	MRO	1, 3, 5
7.	DAVE RUDOLPH	BEPC	MRO	1, 3, 5, 6
8.	ERIC RUSKAMP	LES	MRO	1, 3, 5, 6
9.	JOE DEPOORTER	MGE	MRO	3, 4, 5, 6
10.	SCOTT NICKELS	RPU	MRO	4
11.	TERRY HARBOUR	MEC	MRO	6, 1, 3, 5
12.	MARIE KNOX	MISO	MRO	2
13.	LEE KITTELSON	OTP	MRO	1, 3, 4, 5
14.	SCOTT BOS	MPW	MRO	1, 3, 5, 6
15.	TONY EDDLEMAN	NPPD	MRO	1, 3, 5
16.	MIKE BRYTOWSKI	GRE	MRO	1, 3, 5, 6
17.	DAN INMAN	MPC	MRO	1, 3, 5, 6

5.	Group	Kent Kujala	Detroit Edison			X	X	X					

	Additional Member	Additional Organization	Region	Segment Selection
1.	Jeffrey DePriest		RFC	3, 4, 5

Group/Individual	Commenter	Organization	Registered Ballot Body Segment									
			1	2	3	4	5	6	7	8	9	10

2.	Alexander Eizans		RFC	3, 4, 5
3.	Thomas Tanciar		RFC	3, 4, 5
4.	Barbara Holland		RFC	3, 4, 5

6.	Group	Sam Ciccone	FirstEnergy	X		X	X	X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	William J Smith (VOTER)	FirstEnergy Corp	RFC	1
2.	Stephan Kern (VOTER)	FirstEnergy Energy Delivery	RFC	3
3.	Douglas Hohlbaugh (VOTER)	Ohio Edison Company	RFC	4
4.	Kenneth Dresner (VOTER)	FirstEnergy Solutions	RFC	5
5.	Kevin Querry (VOTER)	FirstEnergy Solutions	RFC	6

7.	Group	Connie Lowe	Dominion	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Louis Slade		RFC	5, 6
2.	Mike Garton		NPCC	5, 6
3.	Michael Crowley		SERC	1, 3
4.	Randi Heise		MRO	5, 6

8.	Group	Barbara Hindin	Edison Electric Institute	X		X		X					
Additional members listed here: http://www.eei.org													

9.	Group	Dennis Chastain	Tennessee Valley Authority (TVA)	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	DeWayne Scott	TVA	SERC	1
2.	Ian Grant	TVA	SERC	3
3.	David Thompson	TVA	SERC	5
4.	Marjorie Parsons	TVA	SERC	6

10.	Group	Chris Higgins	Bonneville Power Administration	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Steve	Larson	WECC	1, 3, 5, 6
2.	Fran	Halpin	WECC	5
3.	Rebecca	Berdahl	WECC	3

Group/Individual	Commenter	Organization	Registered Ballot Body Segment									
			1	2	3	4	5	6	7	8	9	10

4.	Jim	Burns	WECC	1
5.	Erika	Doot	WECC	3, 5, 6
6.	Paul	Fiedler	WECC	1
7.	John	Anasis	WECC	1
8.	Don	Watkins	WECC	1

11.	Group	Stephen J. Berger	PPL Corporation NERC Registered Affiliates	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Brenda L. Truhe	PPL Electric Utilities Corporation	RFC	1
2.	Brent Ingebrigtson	LG&E and KU Services	SERC	3
3.	Annette M. Bannon	PPL Generation, LLC on behalf of its Supply NERC Registered Entities	RFC	5
4.			WECC	5
5.	Elizabeth A. Davis	PPL EnergyPlus, LLC	MRO	6
6.			NPCC	6
7.			SERC	6
8.			SPP	6
9.			RFC	6
10.			WECC	6

12.	Group	Terry Bilke	ISO RTO Standards Review Committee		X								

	Additional Member	Additional Organization	Region	Segment Selection
1.	Kathleen Goodman	ISONE	NPCC	2
2.	Charles Yeung	SPP	SPP	2
3.	Stephanie Monzon	PJM	RFC	2
4.	Steve Meyers	ERCOT	ERCOT	2
5.	Ben Li	IESO	NPCC	2

13.	Group	Tom McElhinney	JEA	X		X		X					

	Additional Member	Additional Organization	Region	Segment Selection
1.	Ted Hobson		FRCC	1
2.	Garry Baker		FRCC	3
3.	John Babik		FRCC	5

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
14.	Individual	Janet Smith	Arizona Public Service Company	X		X		X	X				
15.	Individual	Brenda Hampton	Luminant						X				
16.	Individual	Esteban Martinez	Turlock Irrigation District	X		X	X	X	X				
17.	Individual	Scott Bos	Muscatine Power and Water	X		X		X	X				
18.	Individual	Scott McGough	Georgia System Operations			X							
19.	Individual	Howard Rulf	Wisconsin Electric dba We Energies			X	X	X					
20.	Individual	Darryl Curtis	Oncor Electric Delivery Company LLC	X									
21.	Individual	Wayne Sipperly	New York Power Authority	X		X		X	X				
22.	Individual	Donald E Nelson	Ma Department of Public Utilities									X	
23.	Individual	Anthony Jablonski	ReliabilityFirst										X
24.	Individual	Pablo OÃ±ate	El Paso Electric	X		X		X	X				
25.	Individual	Fred Plett	Massachusetts Attorney General									X	
26.	Individual	Kelsi Oswald	Pinellas County					X					
27.	Individual	PHAN, Si Truc	Hydro-Quebec TransÃ‰nergie	X									
28.	Individual	Andrew Gallo	City of Austin dba Austin Energy	X		X	X	X	X				
29.	Individual	Chris de Graffenried	Consolidated Edison Co. of NY, Inc.	X		X		X	X				
30.	Individual	Thad Ness	American Electric Power	X		X		X	X				
31.	Individual	Jack Stamper	Clark Public Utilities	X									
32.	Individual	D Mason	HHWP	X				X					
33.	Individual	Michelle R D'Antuono	Ingleside Cogeneration LP (affiliate of Occidental Chemical Corporation)					X					
34.	Individual	Kathleen Goodman	ISO New England		X								
35.	Individual	Dave Willis	Idaho Power Co.	X		X							
36.	Individual	Don Jones	Texas Reliability Entity										X
37.	Individual	Andrew Z. Pusztai	American Transmission Company	X									
38.	Individual	John Seelke	Public Service Enterprise Group	X		X		X	X				

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
39.	Individual	Jonathan Appelbaum	The united illuminating Company	X									
40.	Individual	Esteban Martinez	Turlock Irrigation District	X		X	X	X	X				
41.	Individual	Kirit Shah	Ameren	X		X		X	X				
42.	Individual	Charles Yeung	Southwest Power Pool Inc		X								
43.	Individual	Keith Morisette	Tacoma Power	X		X	X	X	X				
44.	Individual	Linda Jacobson-Quinn	FEUS			X							
45.	Individual	Rhonda Bryant	El Paso Electric Company			X							
46.	Individual	Shari Heino	Brazos Electric Power Cooperative Inc.	X				X					
47.	Individual	Diane Barney	New York State Dept of Public Svc									X	
48.	Individual	Terri Pyle	Oklahoma Gas & Electric	X		X		X					
49.	Individual	Maggy Powell	Exelon Corporation and its affiliates	X		X		X	X				
50.	Individual	Eric Salsbury	Consumers Energy			X	X	X					
51.	Individual	RoLynda Shumpert	South Carolina Electric and Gas	X		X		X	X				
52.	Individual	Roger Dufresne	Hydro-QuÃ©bec Production					X					
53.	Individual	Joe Tarantino	Sacramento Municipal Utility District	X		X	X	X	X				
54.	Individual	Michiko Sell	Public Utility District No. 2 of Grant County, WA	X		X	X	X	X				
55.	Individual	Brett Holland	Kansas City Power & Light	X		X		X	X				
56.	Individual	Jason Snodgrass	Georgia Transmission Corporation	X									
57.	Individual	Steven Powell	Trans Bay Cable	X									
58.	Individual	Laurie Williams	Public Service Company of New Mexico	X		X		X	X				
59.	Individual	Rod Noteboom	Pubilic Utility District #2 of Grant County, Washington	X		X	X	X	X				
60.	Individual	Tony Kroskey	Brazos Electric Power Cooperative Inc.	X									

1. **Do you have any comments regarding the inclusion of the statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards?**

Summary Consideration: A majority of the commenters disagreed with the proposed definitions deviating from the statutory language that FERC directed NERC to adopt in Order No. 693. Many of the commenters that disagreed with having conflicting definitions also expressed concerns: 1) that FERC/NERC was expanding jurisdiction; 2) the additional words or change in wording allowed for different interpretations; 3) there was no distinction between the terms "Bulk-Power System" and "Bulk Electric System," and 4) there were differences in capitalization of certain words. One commenter did not agree with a continent-wide ERO adopting language as it appears in the [United States] Federal Power Act. Several commenters disagreed with the statutory definitions including the phrases that: 1) included "cybersecurity;" 2) does not include requirements to enlarge or construct of facilities; and 3) addressed local distribution facilities. One commenter asserted that there was a misunderstanding of the standards development process by arguing that terms should only be added to the NERC Glossary as they are introduced in the development or revision of a standard; terms should be revised as a particular standard is developed.

The rest of the commenters agreed with the definitions, and some provided other specific suggestions or additions to the proposed definitions.

Organization	Yes or No	Question 1 Comment
Dominion	No	Dominion believes the terms should be defined exactly as they are used in Section 215 as intended by Congress.
Response: Thank you for your response, and the terms "Bulk-Power System" ("BPS"), "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Oncor Electric Delivery Company LLC	No	
American Transmission Company	No	

Organization	Yes or No	Question 1 Comment
Hydro One	Yes	There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what constitutes Bulk Power System. Use of the term “supply” could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes.
Response: Thank you for your response, and in order to avoid inconsistency, the terms “Bulk-Power System,” “Reliability Standard,” and “Reliable Operation” will be re-posted with definitions that match the statutory language exactly. There will be no additional changes to capitalization or punctuations.		
Northeast Power Coordinating Council	Yes	There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what constitutes Bulk Power System. Use of the term “supply” could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes. The word “necessary” is also used in the definition. The use of the term ''necessary'' can be left to interpretation. What “Facilities and control systems...” are necessary? For example, a 345kV Phase Angle Regulator might be useful for maintaining transactions, but because of the system configuration does not increase system reliability pre and post contingency. What is meant by “depending on the context”? This implies that there are multiple definitions of “Bulk Power System”. What are they?
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms “Bulk-Power System,”		

Organization	Yes or No	Question 1 Comment
"Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. The additional phrases and words will be removed in the next re-posting of the definitions.		
Western Small Entity Comment Group	Yes	A)The definition of Bulk Power System varies from the FPA definition by the inclusion of the words "depending on the context." 1) We are unsure that either NERC or FERC have the authority to overrule the definition established by Congress. 2) It is unclear what the added words are intended to achieve, and just how far "the context" may allow the the definition to deviate from the listed items. B) The definition of Reliability Standard varies from the FPA definition by the inclusion of the words "without limiting the foregoing." 1) We are again concerned regarding the authority of NERC and FERC to change what has been established by Congress. 2) The added words only add confusion. Once inside the NERC glossary, the "foregoing" will consist of all the definitions preceding it in the alphabet, and none of those following. We don't believe a definition should rely on its place in the alphabet.
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. The additional phrases and words will be removed in the next re-posting of the definitions.		
MRO NSRF	Yes	Bulk Power System: The NSRF believes that to reduce any confusion that it is NERC's intent to not capatilize the word "facilities." Recommend to read, "Bulk Power System means, facilities ..."The NSRF understands that the Commission has directed NERC to include the term "Bulk Power System" in the NERC glossary and this seems to leave NERC very little choice but to address FERC's request. However, NSRF wishes to make it quite clear that it is inappropriate to use the highly unbounded term "Bulk Power System" in a NERC Reliability Standard as compliance cannot be quantified when using an unbounded term. Therefore, a NERC Standards Drafting Team should not use the unbounded term "Bulk Power System" in a new or revised NERC

Organization	Yes or No	Question 1 Comment
		Standard until “Bulk Power System” is clearly defined, similar to the “bright-line” Bulk Electric System. If “Bulk Power System” should not be used in a NERC Reliability Standard, then the FERC decision to direct NERC to include “Bulk Power System” in the NERC glossary is not without defect and the FERC directive should be rescinded.Reliability Standard: NERC has capatilized the word Facility in this definition. NERC’s glossary defines “Facility” as: A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.). With “Facility” capatilized along with Bulk Power System, the industry will equate Bulk Power System directly to Bulk Electric System, 100kV and above. Recommend that “Facility” not be capatilized unless it is NERC’s intent to have BES and BPS to mean the same. Reliable Operation: No comments, thank you.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms “Bulk-Power System,” “Reliability Standard,” and “Reliable Operation” will be re-posted with definitions that match the statutory language exactly. By using the statutory language, the issue of conflicting capitalizations is avoided. Also, use of a specific NERC glossary term in a standard is determined by the standards drafting team and must be approved by industry through the Standards Development Process.		
Detroit Edison	Yes	Bulk Power System- add to the last sentence- The term does not include facilities used in the local distribution of electric energy "or radial lines connecting generation facilities to the Transmission system". Reliability Standard- change the wording of the beginning of the first sentense to read- a document containing one or more requirements to provide for the Reliable Operation of the Bulk Power System. REMOVE the following- including without limiting the foregoing, requirements for the operation of existing Bulk Power System Facilities, including cyber security protection, and including the design of planned additions or modifications to such Facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge Bulk Power System

Organization	Yes or No	Question 1 Comment
		Facilities or to construct new transmission capacity or generation capacity. Leave the last sentence about FERC approval. Bulk Power System - remove "depending on the context:" This implies multiple definitions and there is only one provided. Reliability Standard - change first sentence "means a requirement to provide for..." to "means a requirement or set of requirements to provide for..."
Response: Thank you for your response. The terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
FirstEnergy	Yes	Although we support NERC's initiative to be responsive to FERC directives and do not have any issues with the definitions, we question how they relate to the NERC Glossary of Terms used in the standards. Upon review of the complete set of NERC Reliability Standards, only one of these terms, Reliability Standard, is consistently capitalized in any of the standards. Will NERC be going back and capitalizing each instance of the other two terms in the standards? If not, then we question the need for them to be placed in the Glossary of Terms since no capitalized versions exist in the standards. And if they will be capitalized in the standards, these changes should be part of this project scope, be reviewed in each instance where the term is used to determine if the meaning of any requirements may be altered in any way, and redlines included with the SAR.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Further, since capitalized terms signify that a standard has adopted a particular Glossary definition, the new definitions proposed herein will not affect non-capitalized terms in existing standards.		
Edison Electric Institute	Yes	The Edison Electric Institute submits these comments on behalf of its member companies. EEI believes that NERC has not followed the directive in

Organization	Yes or No	Question 1 Comment
		Order 693 to add the "statutory definitions" of the terms proposed to be added to the Glossary. There are important differences in the wording of the proposed defintions from the definitions of the terms set forth in FPA section 215. EEI believes that since the Glossary is used as the basis for the meaning of defined terms in Reliability Standards subject to enforcement, it is important that statutory terms be defined as thye are in the statute. The proposed defintion of Bulk Power System differs from the section 215 defintion in several ways. (1) The phrase "depending on the context (i)" is not in the section 215 definition. This phrase was taken from the Rules of Procedure Appendix 2 definition, which has a second "(ii)" part that is not included in the statutory defintion. The phrase "depending on the context" may be appropirate for the ROP defintion but not the NERC Glossary defintion, and should be deleted. (2) Although it is in the Appendix 2 defintion, the prhase "an interconnected electric energy supply and transmission network" is not appropriate in both the Glossary and Appendix 2 definitions because it includes "supply," which is not in the section 215 defintion. The section 215 defintion refers to "an interconnected electric energy and transmission network" but does not refer to supply.Two proposed defintions -- Bulk Power System and Reliability Standard" through the use of capitalization incorporate the NERC Glossary term "Facilities, " which is defined in the singular "Facility" as a set of electric equipment that opeates as a single Bulk Electric System Element...." The NERC Glossary defintion of "Bulk Electric System" is therefore incorporated by reference into the "Facility" defintion. It is not appropriate and confusing for a statutory definition to include a term that is defined by a Bulk Electric System parameter. Use of the term creates confusion as to whether BPS facilities is being defined with respect to BES Facilities. Therefore, EEI requests that "Facilities" be replaced with the statutory "facilities" in both defintions.Although the proposed statutory defintions for Bulk Power System and Reliability Standard were approved by FERC in the NERC ROP

Organization	Yes or No	Question 1 Comment
		changes that included Appendix 2, EEI does not believe that is in appropriate to incorpate them into the Glossary defintions. NERC may wish to consider whether the ROP defintion should be revised to be consistent with the statutory definition.As a general matter, the use of capitalized and uncapitalized terms has created confusion, for example the use of the term "facilities" in CAN-0016. Going forward, EEI suggests that NERC review the use of such terms for consistency and clarity.
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. By matching the exact wording in the Federal Power Act, the issue of conflicting capitalized terms is avoided. Also, any necessary changes to the Rules of Procedure will be addressed in a separate project.		
Tennessee Valley Authority (TVA)	Yes	FERC Order 693 was issued in March 2007. In Paragraph 1897 of the Order, in response to the NOPR comments submitted by the City of Santa Clara, California on the definition of Bulk-Power System v. Bulk Electric System, FERC states that "...we clarify that the glossary governs Reliability Standards". It is not clear how the addition of the statutory definition of "Bulk-Power System" (note the statutory definition in section 215 of the FPA as amended by the Electricity Modernization Act of 2005 is hyphenated) into the NERC Glossary of Terms will be applied in the ongoing development of NERC reliability standards. Furthermore, the statutory definitions of "Reliable Operation" and "Reliability Standard" proposed for addition to the NERC glossary include the term "Bulk Power System". If the definition for a "Reliability Standard" contains the term "Bulk Power System", yet NERC is writing standards to the term "Bulk Electric System", the inclusion of these three statutory definitions into the NERC glossary at this point in time provides no additional clarity to the industry or NERC Standard Drafting Teams.In order to comply with the FERC directive in Order 693 to include these statutory definitions in the NERC glossary, TVA is voting affirmative. However, we believe the definitions added to the NERC glossary should be

Organization	Yes or No	Question 1 Comment
		verbatim from section 215 of the Federal Power Act and the source identified in the glossary (see suggested text below), rather than the slightly modified versions added in Appendix 2 of the NERC Rules Of Procedure.Term - Bulk-Power SystemDefinition - (A) Facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy. [As defined in section 215 of the United States Federal Power Act]Term - Reliability Standard Definition - A requirement, approved by the Commission[FERC] under this section[section 215 of the Federal Power Act], to provide for reliable operation of the bulk-power system. The term includes requirements for the operation of existing bulk-power system facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the bulk-power system, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. [As defined in section 215 of the United States Federal Power Act]Term - Reliable Operation Definition - Operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements. [As defined in section 215 of the United States Federal Power Act]
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Therefore, the terms added to the NERC Glossary of Terms will be consistent with the definitions and applications as defined in Section 215 of the Federal Power Act.		

Organization	Yes or No	Question 1 Comment
Bonneville Power Administration	Yes	BPA continues to be concerned with the intermingling of dual terms "Bulk Power System" and "Bulk Electric System"; it continues to cause confusion in the industry. The definition of “Reliability Standard” to be added to the Glossary applies the standards to the Bulk Power System. The definition of “Reliable Operation” to be added to the Glossary refers to the reliable operation of the Bulk Power System. Once these definitions are added to the Glossary, how and where does NERC propose to limit the applicability of the Reliability Standards and the scope of the term Reliable Operation to the Bulk Electric System?
Response: Thank you for your response, and the terms “Bulk-Power System,” “Reliability Standard,” and “Reliable Operation” will be re-posted with definitions that match the statutory language exactly. Any concerns with the applicability of a specific NERC glossary term in a standard should be addressed with the particular standards drafting team in question. Thus, the scope of how these definitions are applied to a standard will be determined through the Standards Development Process. Further, with the recent release of Order No. 773, FERC has clarified the definition and application of the term BES.		
PPL Corporation NERC Registered Affiliates	Yes	The PPL Companies appreciate the attempt by NERC to comply with FERC directives. However, we do have concerns that the definitions of these terms do not match the statutory definitions in Â§215 of the Federal Power Act. Neither NERC nor FERC may change FERC's statutory powers under Section 215. To create new definitions strictly for the NERC Glossary is confusing and counterproductive. Entities should be able to look to the statute as the ultimate authority, and by creating these new definitions, this is made unclear. Suggested defintions are below.”Bulk Power System” means (A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy. “Reliability Standard” means a requirement, approved by the Commission under this section, to provide for reliable operation of the bulk-power system. The term includes

Organization	Yes or No	Question 1 Comment
		requirements for the operation of existing bulk-power system facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the bulk-power system, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. "Reliable Operation" means operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.
Response: Thank you for your response. The terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
ISO RTO Standards Review Committee	Yes	There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what constitutes Bulk Power System. Use of the term "supply" could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes..
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
JEA	Yes	This seems like scope creep. The original intent was for the reliable operation of the BES. It now appears that the term "BES" is being replaced by the term "BPS" which includes the control systems. Concerns on the individual definitions are as follows: o Bulk Power System: It is confusing to

Organization	Yes or No	Question 1 Comment
		say the definition 'depends on the context' and then to not provide multiple definitions. The "and" used between the two possible definitions should be replaced with an "or". The definition of a Facility is "a set of electrical equipment that operates as a single BES Element" so basically the BPS is the BES plus control systems. The last sentence is redundant since it uses a defined term "Facilities" in the first sentence and then "facilities" a non-defined term in the last sentence when it is clear that they are referencing "Facilities" from the first sentence and that already does not include local distribution. It would be better to delete the last sentence. It is also vague to say "needed to maintain transmission system reliability" when "transmission system reliability" is not defined - a better approach would be to replace "transmission system reliability" with "Reliable Operation of the BES". It also appears confusing to say "any portion thereof" when referencing the transmission network - things are either part of the network or they are not and this may lead to creep in the definition. o Reliability Standard: Requirements are a subset of a Reliability Standard - not the standard itself so the definition should not state "a requirement" but instead something to the effect of "a set of requirements, measures, and severity levels". Also Reliability standards were developed for the reliable operation of the BES and now this is causing scope creep by using the term BPS. BPS should be replaced with BES in all occurrences. The term "including" does not "limit" so the phrase "without limiting the foregoing" is redundant. The last part of the first sentence "to the extent necessary for Reliable Operations of the Bulk Power System" is redundant with the first part "to provide for Reliable Operation of the Bulk Power System" and should therefore be removed. Also the rest of the first sentence "but the term does not include any requirements to enlarge Bulk Power System Facilities or to construct new transmission capacity or generation capacity" should also be removed. The problems with that part are twofold. First, Facilities are defined in reference to the BES not to the BPS and secondly this

Organization	Yes or No	Question 1 Comment
		last part would mean that entities would never have to construct new transmission capacity or generation capacity but the standards are clearly intended to insure an adequate supply to meet load which sometimes necessitates building new generation or transmission lines to meet anticipated growth. o Reliable Operation: The "Bulk Power System" should be replaced with the "Bulk Electric System". By using BPS we will need monitoring equipment on all of our control systems to insure such things as proper voltage. Major systems have this in the form of UPS's but some subcomponents of the control systems may not.
Response: Thank you for your response, and your suggestions were considered. However, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Since the wording matches that of Section 215 of the Federal Power Act, and because FERC directed the modification of the definitions to match the statutory language, the definitions are not being amended further. However, when terms are used in a standard, the standards development process allows for using the Glossary definition or refining how a term is to be defined for a particular standard. Further, with the recent release of Order No. 773, FERC has clarified the definition and application of the term "Bulk Electric System."		
Arizona Public Service Company	Yes	AZPS agrees with the definitions for Bulk Power System and Reliability Standard. However, AZPS does not agree with the the definition of Reliable Operation because this includes a Cyber Security Incident. The scope of the Cyber Security Incident can be unlimited and can take multiple facilities out in a single incident. A cyber incident is beyond a normal operation or state and has further reaching impacts than operating limits, cascading failures, etc. It will be almost impossible or at best difficult to classify any operating condition as "Reliable Operation" under this scenario.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Since the Federal Power Act's definition includes cybersecurity, the NERC Glossary will also include such wording for consistency. However, any concerns with the applicability of a specific NERC Glossary term in a standard should be addressed with the particular		

Organization	Yes or No	Question 1 Comment
standards drafting team in question.		
Luminant	Yes	These statutory definitions should match exactly the definitions of those terms in section 215.
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Turlock Irrigation District	Yes	It is confusing to include a definition of the Bulk Power System (BPS) in Standards where the definition of Bulk Electric System (BES) is used for the standards. These are not synonymous terms or definitions and would create confusion rather than clarity. If BPS is a term that is statutory and added to the Reliablity Standards then BPS and BES should align in definition. BPS makes no reference to voltage threshold whereas the BES definition refers to 100kV and above. Regardless of what the voltage threshold is, there should be alignment in definition if both are to be included in the standards to avoid confusion. Without a threshold, such as voltage level, it is unclear what electric facilities are defined as BPS. It will therefore be unclear as to what electric facilities the NERC Reliability Standards will apply to.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Further, with the recent release of Order No. 773, FERC has clarified the definition and application of the term "Bulk Electric System." Order No. 773 specifically addressed BES voltage thresholds.		
Muscatine Power and Water	Yes	Bulk Power System: MPW believes that to reduce any confusion that it is NERC's intent to not capatilize the word "facilities." Recommend to read, "Bulk Power System means, facilities ..." (lower case f)"Bulk Power System" is defined by Section 215(a) (1) of the Federal Power Act as "facilities...."This is lower case "f" in the Federal Power Act. The NERC definition should be consistent with the lower case "f" used in Section 215(a) of the Federal Power Act.MPW understands that the Commission has directed NERC to

Organization	Yes or No	Question 1 Comment
		include the term "Bulk Power System" in the NERC glossary and this seems to give NERC very little choice but to address FERC's request. However, MPW wishes to make it exceedingly clear that it is inappropriate to use the highly unbounded term "Bulk Power System" in a NERC Reliability Standard as compliance cannot be quantified when using an unbounded term. Therefore, a NERC Standards Drafting Team should not use the unbounded term "Bulk Power System" in a new or revised NERC Standard until "Bulk Power System" is clearly defined, similar to the "bright-line" Bulk Electric System. If "Bulk Power System" should not be used in a NERC Reliability Standard, then the FERC decision to direct NERC to include "Bulk Power System" in the NERC glossary is not without defect and the FERC directive should be rescinded.Reliability Standard: NERC has capatilized the word Facility in this definition. NERC's glossary defines "Facility" as: A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.). With "Facility" capatilized along with Bulk Power System, the industry will equate Bulk Power System directly to Bulk Electric System, 100kV and above. MPW recommends that "Facility" not be capatilized unless it is NERC's intent to have BES and BPS to mean the same. Reliable Operation: No comments, thank you.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. By matching the exact wording in the Federal Power Act, the issue of whether or not certain capitalized terms expand the definition of bulk-power system is avoided. Also, BES and BPS are not intended to be synonymous terms; with the recent release of Order No. 773, FERC has clarified the definition and application of the term "Bulk Electric System." Order No. 773 specifically addresses the voltage threshold for BES facilities.		
Georgia System Operations	Yes	The FERC Directive rests on a misunderstanding of the NERC standards development process. Terms are added to the glossary as they are introduced in the development or revision of a standard; they are not added speculatively in anticipation that they will be used later, or retroactively to

Organization	Yes or No	Question 1 Comment
		modify the meaning of a standard. The FERC directive to add these definitions should be taken as a directive to revise the affected standards using the statutory definitions and at that point add them to the glossary. Using this approach will provide industry the opportunity to focus on how utilizing these definitions might change the meaning of the affected standards. Through the standards development process it might be concluded that the statutory definition can be applied with no adverse consequences, resulting in a trivial revision of the standard (i.e. the addition of the term to the glossary and the capitalizing of the term in the standards). However it is also possible that the SDT and industry will conclude that additional changes to the standard are required to reflect the intended meaning of affected requirements in light of the new definition. Using the standards development process such changes could be made. If this SAR is approved there will be no such flexibility. The new definitions will be added as written with no opportunity for modification to the definitions or to standards that use these terms in the lower case. This would result in confusion about whether these definitions apply to non-capitalized terms that pre-date the definition. It could also lead to unintended consequences of applying a new definition to an existing requirement without a thorough vetting of the impact of the changes.
Response: Thank you for your response. The terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. By matching the exact language in Section 215 of the Federal Power Act, inconsistencies such as the issue of capitalization are eliminated. Any concerns with the use of a specific NERC Glossary term in a standard should be addressed with the particular standards drafting team in question. The Standards Development Process provides for industry approval and each drafting team may tailor specific definitions for terms as they are used in a particular standard. Therefore, if there is a concern that a definition is being altered as it is used in a standard, then that issue should be brought to the attention of the standard drafting team.		
Wisconsin Electric dba We Energies	Yes	The phrase "depending on the context" in the Bulk Power System definition makes the definition subjective. Who decides, when "Bulk Power System" is used, if the NERC Glossary definition applies or not since it depends on the

Organization	Yes or No	Question 1 Comment
		context? In FERC's BES Definition NOPR (docket RM12-6) it is apparent that both FERC and NERC are concerned with inconsistency, subjectivity, and discretion in the application of NERC Glossary definitions. See paragraphs 17, 19, 37, 56, and 72 of that NOPR. The phrase "depending on the context" needs to be removed from the Bulk Power System definition.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Therefore, the phrase "depending on the context" will not appear in the definition for BPS.		
Ma Department of Public Utilities	Yes	1) NERC, as an ERO, is a continent wide reliablity organization and adopting terms that have FPA 215 origins is particularly problematic for Canadian members.2) The term "Reliable Operation" has been changed slightly from the statutory definition provided in the FPA 215 to include the word "supply" to the transmission system which could have far reaching implications and create serious jurisdictional issues (i.e. distribution, cranking paths, etc.). This is contrary to project which was to add the specific definition to the glossary not create a "new" inconsistent one.3) There was general concern over the "quality" of the definitions and many believe they are problematic and create scope issues with the standards and unrealistic reliability objectives.
Response: Thank you for your response, and your viewpoint was considered. However, in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. By matching the statutory language, the concern surrounding the world "supply" is alleviated, and the definitions will then be consistent with the FERC directives found in Order No. 693.		
ReliabilityFirst	Yes	ReliabilityFirst votes in the Affirmative for the three proposed definitions to be added to the NERC Glossary of Terms. ReliabilityFirst agrees that the definitions (approved by the Commission) in the NERC RoP should be consistent with the defined terms in the NERC Glossary of Terms. While ReliabilityFirst votes in the Affirmative, we offer the following comment for

Organization	Yes or No	Question 1 Comment
		consideration:1. The three proposed definitions appear in a number of NERC/FERC approved Standards, though they are not capitalized. Assuming these three definitions are approved and added to the NERC Glossary of Terms, will there be a holistic capitalization of these terms through the suite of NERC/FERC approved standards?
Response: Thank you for your response, and in order to avoid conflict with the Federal Power Act, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Any necessary changes for the Rules of Procedure will need to be made in a separate project. Further, any concerns with the applicability of a specific NERC glossary term in a standard should be addressed with the particular standards drafting team in question; this includes whether or not to use a defined term in any standard. If a standard has not adopted a particular Glossary definition, then the term in not capitalized in the standard.		
El Paso Electric	Yes	EPE votes no on the current proposal for two reasons:First, the proposed definitions do not mirror the statutory language in Section 215 of the Federal Power Act. The deviation EPE finds particularly objectionable is the proposed use of the words "electric energy supply and transmission network" in the definition of "bulk power system" when the statute uses the words "electric energy transmission network." The addition of the words "supply and" in the proposed definition could be read to stretch the scope of the facilities subject to FERC's reliability jurisdiction beyond what Congress intended (and specifically defined) in the statute.Second, there is a need for NERC to address whether the term "bulk power system" is intended to replace the currently-effective term, "bulk electric system." EPE's understanding from discussions in the standards development process is that the "bulk electric system" definition will continue in effect, and be used as a type of subset under the definition of "bulk power system." It is important for voting entities to be informed of the context in which the definition is proposed for effectiveness. We urge NERC to address how the proposed definition of "bulk power system" is intended to be implemented in measuring compliance with the various reliability standards:Specifically: 1) Will the definition of "bulk power system" be used in addition to - or in place

Organization	Yes or No	Question 1 Comment
		of - the definition of “bulk electric system”? 2) If both terms are to be used, will each reliability standard be modified to identify whether it applies to the “bulk power system” or the “bulk electric system”? 3) Will the currently-effective threshold of 100 kV remain in effect, such that all such facilities within the definition of “bulk electric system” will be assumed by NERC and the regional entities to be subsumed within the definition of “bulk power system”? 4) Does NERC envision conducting or directing an assessment of each TO/TP’s transmission assets to delineate which lines (regardless of voltage) fall within the “bulk power system” definition of “necessary for operating an interconnected electric energy transmission network”? EPE urges continuation of the 100 kV threshold. 5) Will NERC exclude from the parameters of “bulk power system” radial transmission lines in the same manner as those lines are excluded from the definition of “bulk electric system” today? EPE would like for any proposed definition to speak directly to the exclusion of radial lines.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms “Bulk-Power System,” “Reliability Standard,” and “Reliable Operation” will be re-posted with definitions that match the statutory language exactly. Also, it must be noted that the BPS term is not synonymous with BES. BES is a subset of BPS, and NERC Reliability Standards generally apply to the BES. Further, with the recent release of Order No. 773, FERC has clarified the definition and application of the term BES.		
Massachusetts Attorney General	Yes	The definition of Reliable Operation is too black and white where it says "will not occur as a result of a sudden disturbance, including a Cyber Security Incident, or unanticipated failure of system Elements". There are limits to redundancy in design, such as n-x where x >= 2, conditions, where such events could occur and the system should not be designed to prevent against such events because the probability is too low and the cost is too high.
Response: Thank you for your response, and the term “Reliable Operation” will be re-posted with a definition that matches the statutory language found in Section 215 of the Federal Power Act.		

Organization	Yes or No	Question 1 Comment
Pinellas County	Yes	The wording of the definition of Bulk Power System says "electric energy from generating facilities". I think the intent is to include the generating facilities as part of the Bulk Power System, not just the energy they generate. This language should be reviewed.
Response: Thank you for your response, and in order to avoid conflicting definitions, the term "Bulk-Power System" will be re-posted with a definition that matches the statutory language found in Section 215 of the Federal Power Act.		
Hydro-Quebec Transenergie	Yes	There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what constitutes Bulk Power System. Use of the term "supply" could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. Also the use of the term ''necessary'' can be leave to different interpretations. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
City of Austin dba Austin Energy	Yes	Austin Energy believes the definitions in the Rules of Procedure ought to exactly match the definitions in the statute. For example, "Facilities" in the definition of "Bulk Power System" should not be capitalized in the RoP because it is not capitalized in the statute.Additionally, you have included an "(i)" in the definition, but omitted "(ii)" and, therefore, people will not know where the distinction is supposed to be for "depending on the context."Additionally, adding "depending on the context" creates ambiguity because context is subjective.Finally, adding the word "supply" has the potential to change the definition.Consequently (and to avoid confusion),

Organization	Yes or No	Question 1 Comment
		Austin Energy recommends using the terms exactly as defined in the statute.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Consolidated Edison Co. of NY, Inc.	Yes	Con Edison supports NPCC's comments.
Response: *See* Response to NPCC		
American Electric Power	Yes	AEP reccomends that whatever changes are accepted in regards to the proposed definitions are also carried over to the ROP and that an effort is made that they be kept in sync with one another.With regard to the definition of "Bulk Power System", we recommend changing the text from "(ii) and electric energy from generating facilities needed" to "(ii) and generating facilities producing the electric energy needed..."With regard to the definition of "Reliability Standard", recommend using another word in place of the lower case "requirement" to avoid confusing it with the defined term "Requirement". In addition, NERC may want to consider including planning and maintenance as part of this definition, going beyond operations only.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Any necessary changes to the Rules of Procedure will be addressed in a separate project.		
Clark Public Utilities	Yes	The definition of Reliability Standard is too long and confusing. I cannot keep up with what the definition is attempting to state in the first long sentence. Why does the definition of Reliability Standard need these references to existing BPS facilities, cyber facilities, and planned facilities? The discussion of existing and planned BPS facilities does not add anything to this

Organization	Yes or No	Question 1 Comment
		definition. Cyber equipment is already included in the definition of Bulk Power System (i.e. control systems) so the mention of cyber is not needed. I suggest the definition be shortened to the following: "Reliability Standard" means a document that provides the minimum requirements necessary to provide for the Reliable Operation of the Bulk Power System. A Reliability Standard shall not be effective in the United States until approved by the Federal Energy Regulatory Commission and shall not be effective in other jurisdictions until made or allowed to become effective by the Applicable Governmental Authority.
Response: Thank you for your response, and in order to avoid confusion, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
HHWP	Yes	The need for a different definitions of BPS and BES remains perplexing. If there is a real difference between these systems, then that should be refereced in the definition. Until the difference between the BPS and BES is clear, no BPS definition, stautory or otherwise is truely meaningful.
Response: Thank you for your response; with the recent release of Order No. 773, FERC has clarified the definition and application of the term BES. BPS is the term to use when generally speaking about the interconnected network or power grid. While the Energy Policy Act grants authority to NERC over the BPS, the NERC Reliability Standards generally apply to the BES. Any concerns with the applicability of a specific NERC glossary term in a standard should be addressed with the particular standards drafting team in question.		
Ingleside Cogeneration LP (affiliate of Occidental Chemical Corporation)	Yes	OEVC would like to see NERC commit to aligning the statutory definitions with those traditionally used in the base of Reliability Standards. The industry has expended a significant amount of effort developing an updated defintion of the Bulk Electric System and an Adequate Level of Reliability - which correspond to Bulk Power System and Reliable Operation respectively. If the terms mean different things depending on the circumstances, then those differences must be addressed. Unfortunately

Organization	Yes or No	Question 1 Comment
		both NERC and FERC have invoked the reliability of the "BPS" in taking actions which are outside of the scope of the in-effect Reliability Standards. Such actions can be perceived as cynical by industry stakeholders and do not instill a sense of shared direction with the regulatory bodies. Similarly, the task force developing the definition of "Adequate Level of Reliability" has not addressed how it is linked to the statutory definition of "Reliable Operation". In OEVC's view, this can actually be an opportunity to weigh the true spirit of partnership by discussing how both governmental authorities and the industry can communicate realistic expectations of BES or BPS reliability to the public. Although it is perfectly valid to expect the industry to invest time and effort into continual reliability improvements, a united understanding on the state of electric system availability would go far to repair fences on all sides. The conversation should rely on the target performance metrics that NERC has been developing for years - a scientific foundation which should remove any ambiguity from the equation.
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Your suggestions are being taken under consideration, and continual open dialogue and collaboration with the industry is encouraged.		
ISO New England	Yes	There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what constitutes Bulk Power System. Use of the term "supply" could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes. The word "necessary" is also used in the definition. The use of the term ''necessary'' can be left to interpretation. What "Facilities and control systems..." are necessary? For example, a 345kV Phase Angle Regulator might be useful for maintaining transactions, but

Organization	Yes or No	Question 1 Comment
		because of the system configuration does not increase system reliability pre and post contingency. What is meant by "depending on the context"? This implies that there are multiple definitions of "Bulk Power System". Why?
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Idaho Power Co.	Yes	There should be more of an effort to unify the definitions of Bulk Power System and Bulk Electric System. Having both defined terms used in Reliability Standards add to the confusion and incorrect interpretation of the applicability of the standards.
Response: Thank you for your response. With the recent release of Order No. 773, FERC has clarified the definition and application of the term "Bulk Electric System." Bulk-Power System is the term to use when generally speaking about the interconnected network or power grid. While the Energy Policy Act grants authority to NERC over the BPS, the NERC Reliability Standards generally apply to the BES. Therefore, standards may be written to apply to the BES (or portions of the BES) but may also include other elements necessary for the reliable operation of the BPS.		
Texas Reliability Entity	Yes	Texas RE voted "Negative" because in the definition of BPS the text "depending on the context: (i)", which was copied from the RoP definition, is extraneous here because there is no part (ii), and there is no alternative meaning. There is a part (ii) in the RoP definition that NERC removed from the proposed glossary definition. As written, this extraneous language will cause confusion and lead to unneccessary disputes, as it could cause some parties to seek alternative meanings ("depending on the context") where none is intended.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System,"		

Organization	Yes or No	Question 1 Comment
"Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Public Service Enterprise Group	Yes	1. The proposed definition of Bulk Power System differs from the Section 215 definition is several ways.a. The phrase ", depending on the context: (i)" is not in the Section 215 terminology. This phrase was taken from the ROP Appendix 2 definition, which has a second "(ii)" part that is not included in the statutory definition. The phrase ", depending on the context: (i)" is appropriate for the Appendix 2 definition but not the NERC Glossary definition of Bulk Power System and should be deleted.b. Although it is in the Appendix 2 definition, the phrase "an interconnected electric energy supply and transmission network" is an error that is in both the proposed Glossary definition and the Appendix 2 definition because it includes "supply and" which is not in the Section 215 definition. The Section 215 definition has the phrase "an interconnected electric energy transmission network."2. Two proposed definitions - Bulk Power System and Reliability Standard - use the NERC Glossary term "Facilities" which is defined, in the singular "Facility," as "A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.) ." The NERC Glossary definition "Bulk Electric System" is therefore embedded into the "Facility" definition. It is inconsistent and confusing for a statutory definition to include a term that is defined by a Bulk Electric System parameter. For example, the definition of Reliability Standard uses the phrase "Bulk Power System Facilities" which infers that BPS Facilities are comprised of only BES Elements. A similar problem arises in the definition of Bulk Power System - the use of the term "Facilities" infers that the Bulk Power System is limited to BES Elements. We therefore request that "Facilities" be replaced with "facilities" in both definitions.3. Although the proposed statutory definitions for Bulk Power System and Reliability Standard were approved by FERC in the NERC ROP changes that included Appendix 2, we request that NERC petition FERC to correct the

Organization	Yes or No	Question 1 Comment
		similar Appendix 2 definitions that include the errors discussed above.
Response: Thank you for your response, and in order to avoid conflicting definitions between the law and the glossary, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Any necessary changes to Appendix 2 of the Rules of Procedure will be made at a later time through a separate project.		
The united illuminating Company	Yes	NERC has not followed the directive in Order No. 693 to add the "statutory definitions" of the terms proposed to be added to the Glossary. There are differences in the wording of the proposed definitions from the definitions set forth in Section 215. Nerc should consider the implications of using capitalization in the definition especially with the word Facilities. As a capitalized term it will refer back to the NERC Glossary and may not have the same intent as section 215.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. By matching the exact wording in the Federal Power Act, the issue surrounding certain capitalized terms is avoided.		
Turlock Irrigation District	Yes	Without a threshold, such as voltage level, it is unclear what electric facilities are defined as BPS. It will therefore be unclear as to what electric facilities the NERC Reliability Standards will apply to.
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Since the statutory definitions do not include voltage levels for bulk-power system, it will not be included in the glossary. However, FERC has recently clarified in Order No. 773 certain voltage thresholds to be included in the BES. The BES is a subset of the BPS, and the standards generally apply to the BES.		
Ameren	Yes	We understand that as these are statutory definitions and are identical to approved by the Commission, NERC is proposing to make no modifications but following the procedure to include them to the NERC Glossary.

Organization	Yes or No	Question 1 Comment
		However, in case any modifications are pursued, we have the following comments/concerns for considerations:(1)Use of two separate terms Bulk Power System (BPS) and Bulk Electric System (BES) continues to remain confusing and at times appears to be used interchangeably. (2)The definition of "Reliability Standard" states that the term does not include any requirement to enlarge Bulk Power System Facilities or to construct new transmission capacity or generation capacity. But, it seems that the TPL standards or proposals for redundancy require "enlarging" BPS facilities and/or construct new transmission capacity. (3)The definition for "Reliable Operation" implies zero tolerance. We believe that some allowance needs to be made for a low probability of occurrence of system failure in this definition. We suggest inclusion of the following or similar concept:"Reliable Operation" means operating the Elements of the Bulk Power System within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or Cascading failures of such system has an acceptable low probability of occurrence as a result of a sudden disturbance, including a Cyber Security Incident, or unanticipated failure of system Elements.
Response: Thank you for your response, and for clarification, BPS is the term to use when generally speaking about the interconnected network or power grid. BES is the portion of the BPS to which the standards generally apply. Therefore, while the NERC Reliability Standards generally apply to the BES, the Energy Policy Act grants authority to NERC over the BPS. Therefore, standards may be written to apply to the BES (or portions of the BES) but may also include other elements necessary for the reliable operation of the BPS. The terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Any concerns with the applicability of a specific NERC glossary term in a standard should be addressed with the particular standards drafting team in question; therefore, issues with the TPL standard or any other standard should be brought to the attention of that particular drafting team.		
Southwest Power Pool Inc	Yes	Although the reliability standards clearly are mandated by legislative language to apply to all users of the Bulk Power System, the change of the term "electric transmission..." to "electric supply and transmission..." distinctly identifies authority over electric suppliers without restriction. This

Organization	Yes or No	Question 1 Comment
		could be misinterpreted to include authority to order construction and/or expansion of electric supply (generator) facilities. The existing unaltered legislative language along with clarifying language asserting authority over all users of the Bulk Power System is understood and appropriate for fulfilling the legislative mandate.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Tacoma Power	Yes	Tacoma Power appreciates the opportunity to comment on these proposed definitions. We believe the definitions need to be changed to avoid confusion in the standards and their applicability for compliance monitoring and auditing. We suggest changing the proposed definition of "Reliability Standard" by removing Bulk Power System and replacing it with the term Bulk Electric System. The Reliability Standards need to use the Bulk Electric System definition as accepted by the industry, NERC and FERC. Additionally, we suggest changing the proposed definition of "Reliable Operation" by striking the phrase, "... including a Cyber Security Incident, ..." because a Cyber Security Incident is appropriately addressed within the CIPs standards and it is confusing to reference it in this definition.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Therefore, "cybersecurity incident" cannot be removed since it appears in Section 215 of the Federal Power Act. Further, with the recent release of Order No. 773, FERC has clarified the definition and application of the term "Bulk Electric System." BPS is the term to use when generally speaking about the interconnected network or power grid. BES is the portion of the BPS to which the standards generally apply. Therefore, standards may be written to apply to the BES (or portions of the BES) but may also include other elements necessary for the reliable operation of the BPS.		
FEUS	Yes	Comments: FEUS is concerned with the modifications made to the definition of the Bulk Power System (BPS). While the definition proposed here

Organization	Yes or No	Question 1 Comment
		matches the definition included in the NERC Rules of Procedure (ROP), it differs from the definition included in FERC Order 693 and Section 215 of the Energy Policy Act; both of which were fomalized prior to the modification NERC ROP. The proposed definition for BPS now includes 'depending on the context' which is ambiguous and unclear. In addition, 'supply and' was added in the context of (i). FEUS recommends removing the added language in both instances to align the definition with the already established definition in Section 215 and Order 693.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Any necessary changes to the Rules of Procedure will be addressed in a separate project.		
El Paso Electric Company	Yes	First, the proposed definitions do not mirror the statutory language in Section 215 of the Federal Power Act. The deviation EPE finds particularly objectionable is the proposed use of the words "electric energy supply and transmission network" in the definition of "bulk power system" when the statute uses the words "electric energy transmission network." The addition of the words "supply and" in the proposed definition could be read to stretch the scope of the facilities subject to FERC's reliability jurisdiction beyond what Congress intended (and specifically defined) in the statute.Second, there is a need for NERC to address whether the term "bulk power system" is intended to replace the currently-effective term, "bulk electric system." EPE's understanding from discussions in the standards development process is that the "bulk electric system" definition will continue in effect, and be used as a type of subset under the definition of "bulk power system." It is important for voting entities to be informed of the context in which the definition is proposed for effectiveness. We urge NERC to address how the proposed definition of "bulk power system" is intended to be implemented in measuring compliance with the various reliability standards:Specifically: 1) Will the definition of "bulk power

Organization	Yes or No	Question 1 Comment
		system" be used in addition to - or in place of - the definition of "bulk electric system"? 2) If both terms are to be used, will each reliability standard be modified to identify whether it applies to the "bulk power system" or the "bulk electric system"? 3) Will the currently-effective threshold of 100 kV remain in effect, such that all such facilities within the definition of "bulk electric system" will be assumed by NERC and the regional entities to be subsumed within the definition of "bulk power system"? 4) Does NERC envision conducting or directing an assessment of each TO/TP's transmission assets to delineate which lines (regardless of voltage) fall within the "bulk power system" definition of "necessary for operating an interconnected electric energy transmission network"? EPE urges continuation of the 100 kV threshold. 5) Will NERC exclude from the parameters of "bulk power system" radial transmission lines in the same manner as those lines are excluded from the definition of "bulk electric system" today? EPE would like for any proposed definition to speak directly to the exclusion of radial lines.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. In addition, NERC is not replacing the term "Bulk Electric System." With the recent release of Order No. 773, FERC has clarified the definition and application of the term BES. Order No. 773 specifically addresses the voltage threshold, and NERC has petitioned FERC for clarification on certain other facilities that may be included in the BES. However, BPS is the term to use when generally speaking about the interconnected network or power grid. BES is the portion of the BPS to which the standards generally apply, but the standards may also apply to the BPS. Also, any concerns with the applicability of a specific NERC glossary term in a standard should be addressed with the particular standards drafting team in question.		
Brazos Electric Power Cooperative Inc.	Yes	"Facilities" in the definition of "Bulk Power System" should not be capitalized in the RoP because it is not capitalized in the statute.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		

Organization	Yes or No	Question 1 Comment
Any necessary changes in the Rules of Procedure will be addressed through a separate project.		
New York State Dept of Public Svc	Yes	There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies will increase confusion of what constitutes the Bulk Power System. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Oklahoma Gas & Electric	Yes	Regarding the proposed NERC Glossary definition for Bulk Power System:1. The proposed wording includes "an interconnected electric energy supply and transmission network" while the Section 215 wording is "an interconnected electric energy and transmission network". It is recommended that the NERC Glossary of Terms definition reflect the wording in 215, or "an interconnected electric energy and transmission network".2. The addition of the phrase "depending on the context" could lead to additional ambiguity.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Exelon Corporation and its affiliates	Yes	Exelon supports and reiterates the comments submitted by EEI.
Response: *See* response to EEI comments		
Consumers Energy	Yes	- It is unclear whether the terms Bulk Electric System and Bulk Power System are meant to be synonymous. Please clarify this.- The word "facilities"

Organization	Yes or No	Question 1 Comment
		should not be capitalized. With Facility capitalized along with Bulk Power System, the industry will
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. This will alleviate concerns regarding the capitalization of certain words. Also, BPS and BES are not synonymous terms. BPS is the term to use when generally speaking about the interconnected network or power grid, and BES is the portion of the BPS to which the standards generally apply. Further, with the recent release of Order No. 773, FERC has clarified the definition and application of the term BES. However, any concerns with the applicability of a specific NERC glossary term in a standard should be addressed with the particular standards drafting team in question.		
South Carolina Electric and Gas	Yes	SCE&G does not agree with the inclusion of the proposed statutory definitions in the NERC Glossary of Terms. While the definition of Bulk Power System is utilized by FERC, it is broader in scope than the currently defined "Bulk Electric System," and; therefore, the proposed statutory definitions "Reliability Standard" and "Reliable Operation" should reference the currently defined "Bulk Electric System" and not "Bulk Power System" or they will potentially change the scope of the NERC Reliability Standards.
Response: Thank you for your response. In order to comply with FERC's directive, "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. BPS is the term to use when generally speaking about the interconnected network or power grid, and BES is the portion of the BPS to which the standards generally apply. Therefore, references to the BES are still appropriate, and the wording is consistent with Section 215 of the Federal Power Act.		
Hydro-Quebec Production	Yes	The NERC proposal implies an interpretation of the context which differs from the section 215 of the Federal Power Act. We believe that this definition could open the door to application of the NERC standards in areas where there are not required for the reliability of interconnected electric systems and for that reason, NERC should incorporate the definitions exactly as they appear in the statutory glossary. NERC should also define the

Organization	Yes or No	Question 1 Comment
		meaning of 'necessary' in the definition in order to eliminate confusion.
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Sacramento Municipal Utility District	Yes	The current language for the proposed definitions is lengthy and unclear. Although we are in support of the definitions we do urge the revision to the definitions that provide a more precise definition. Please find the following suggestions: Bulk Power System-An electrical network consisting of the facilities for control and transmission of electrical energy from generation sources to load centers. Bulk Power Systems do not include facilities used for the local distribution of electric energy. Reliability Standard-A standard used to establish minimum requirements for design, reliable operation, and security for Bulk Power System facilities and for the training of operators of the Bulk Power System. A reliability standard does not require Bulk Power System expansion or the addition of new transmission or generation capacity. A Reliability Standard becomes effective in the United States upon approval by the Federal Regulatory commission and in other jurisdictions as made or allowed by the Applicable Governmental Authority. Reliable Operation-The operation of a Bulk Power System in accordance with Reliability Standards, accepted electric utility practices, and parameters for thermal, voltage, and stability limits to avoid unnecessary separation of system facilities and cascading failures due to a system element failure, instability, or a security problem. Thank you for your consideration.
Response: Thank you for your response, and your proposal was considered. However, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly in order to comply with FERC's directives in Order No. 693.		
Public Utility District No. 2 of Grant County, WA	Yes	The proposed definition of Bulk Power System contained in Project 2012-08 has been modified from the statutory definition contained in the Federal

Organization	Yes or No	Question 1 Comment
		Power Act. As such, the NERC definition of Bulk Power System will not agree with FERC's statutory definition. The addition of "depending on the context" leads to ambiguity in the application of the defined term. Distinguishing between an "interconnected electric energy supply and transmission network" appears to be an expansion of system applicability within the definition. In addition to the concerns listed, has FERC directed NERC to revise the definition of the Bulk Power System? Per Order 693, the ERO has the authority to define the Bulk Electric System, but the Commission has jurisdiction over the definition of Bulk Power System. I see the Order to revise the glossary, but not the statutory definition.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Kansas City Power & Light	Yes	KCP&L wishes to adjoin the company and endorse the comments of the Edison Electric Institute.
Response: *See* response to EEI comments		
Georgia Transmission Corporation	Yes	The introduction to the NERC Glossary states "This Glossary lists each term that was defined for use in one or more of NERC's continent-wide or Regional Reliability Standards...". Accordingly, as mentioned in paragraph 1894 listed in the SAR, "the Reliability Standards refer to the bulk electric system, which is also defined in the glossary." Inserting the proposed statutory definitions without modification could have a negative impact and conflicting circular references between the two terms BPS and BES when Reliability Standard only captures the term BPS; which would be inconsistent with the stated purpose of the NERC Glossary identified above. Additionally, GTC has concern there is a potential risk of expanding jurisdictional exposure to Reliability Standards if these terms were approved within the NERC Glossary without modification and subsequently included

Organization	Yes or No	Question 1 Comment
		within the language of a Reliability Standard requirement. Lastly, GTC feels it is important that the industry maintain a primary role in the standards development process and disagrees with the recommendation to waive the requirement for posting for industry comment thus pushing the definitions straight to industry ballot when even the Commission directed the ERO to modify the glossary through the Reliability Standards development process.
Response: Thank you for your response, and in order to comply with FERC's Directive in Order No. 693, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Language that deviated from the statutory language proved to be contentious, and caused further confusion based on comments received. Further, with the recent release of Order No. 773, FERC has clarified the definition and application of the term "Bulk Electric System." By matching the exact wording in the Federal Power Act, the jurisdictional reach of the reliability standards is not expanding. Finally, the standards development team agrees that the industry should maintain a strong primary role in the standards development process, and any exceptions to that process must be approved by the Standards Committee.		
Trans Bay Cable	Yes	Why have a BES and BPS definition? There has not been enough clarity on why NERC wants two definitions. Also, no clarity in regards to the opening context of, "depending on the context" this leaves a lot to intrepretation.
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. With regard to the two definitions, in Order No. 773, FERC clarified the definition and application of the term BES. However, BPS is the term to use when generally speaking about the interconnected network or power grid; this defines NERC's jurisdiction. BES is the portion of the BPS to which the standards generally apply; BES is a subset of the BPS.		
Public Service Company of New Mexico	Yes	PNM supports the comments filed by EEI.
Response: *See* response to EEI comments		
Pubilic Utility District #2 of Grant County, Washington	Yes	See comments submitted by GCPD Segment 5 ballot member.

Organization	Yes or No	Question 1 Comment
Response: *See* response to Public Utility District No. 2 of Grant County comments.		
Brazos Electric Power Cooperative Inc.	Yes	In the definition of "Bulk Power System" the word "Facilities" should not be capitalized in the RoP because it is not capitalized in the statute. There is included an "(i)" in the proposed definition, but there is no "(ii)" which is confusing. Also the addition of the word "supply" has the potential to change the definition.In the definition of "Reliable Operation" the words "will not occur" should be changed to "should not occur".
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Any necessary changes to Rules of Procedure will be addressed in a separate project.		
New York Power Authority		NYPA supports the comments submitted by the NPCC Regional Standards Committee (RSC).
Response: *See* response to NPCC comments		

END OF REPORT

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Consideration of Comments

Phase 1 of Glossary Updates: Statutory Definitions
Project 2012-08.1

The Project 2012-08.1 Drafting Team thanks all commenters who submitted comments on the inclusion of the statutory definitions for Bulk-Power System, Reliability Standards, and Reliable Operation in the NERC Glossary of Terms. These standards were posted for a 30-day public comment period from February 21, 2013 through March 22, 2013. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form. There were 29 sets of comments, including comments from approximately 72 different people from approximately 44 companies representing all of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's project page.

If you feel that your comment has been overlooked, 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, Mark Lauby, at 404-446-2560 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.[1]

[1] The appeals process is in the Standard Processes Manual: http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf

Index to Questions, Comments, and Responses

The Industry Segments are:

1 — Transmission Owners
2 — RTOs, ISOs
3 — Load-serving Entities
4 — Transmission-dependent Utilities
5 — Electric Generators
6 — Electricity Brokers, Aggregators, and Marketers
7 — Large Electricity End Users
8 — Small Electricity End Users
9 — Federal, State, Provincial Regulatory or other Government Entities
10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Guy Zito	Northeast Power Coordinating Council										X

	Additional Member	Additional Organization	Region	Segment Selection
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10
2.	Carmen Agavriloai	Independent Electricity System Operator	NPCC	2
3.	Greg Campoli	New York Independent System Operator	NPCC	2
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
5.	Brian Robinson	Utility Services	NPCC	8
6.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
7.	Donald Weaver	New Brunswick System Operator	NPCC	2
8.	Kathleen Goodman	ISO - New England	NPCC	2
9.	Wayne Sipperly	New York Power Authority	NPCC	5
10.	David Kiguel	Hydro One Networks Inc.	NPCC	1

Group/Individual	Commenter	Organization	Registered Ballot Body Segment									
			1	2	3	4	5	6	7	8	9	10

11.	Christina Koncz	PSEG Power LLC	NPCC	5
12.	Randy MacDonald	New Brunswick Power Transmission	NPCC	9
13.	Bruce Metruck	New York Power Authority	NPCC	6
14.	Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
15.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
16.	Robert Pellegrini	Th United Illuminating Company	NPCC	1
17.	Si-Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
18.	David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

2.	Group	Mike Lowman	Duke Energy	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Doug Hills			1
2.	Lee Schuster			3
3.	Dale Goodwine			5
4.	Greg Cecil			6

3.	Group	Morgan Senkal	Bonneville Power Administration	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Erika Doot	BPA, Generation Support	WECC	3, 5, 6
2.	James Burns	BPA, Technical Operations	WECC	1
3.	Timothy Loepker	BPA, Dittmer Dispatch	WECC	1
4.	John Anasis	BPA, Technical Operations	WECC	1
5.	Fran Halpin	BPA, Duty Scheduling	WECC	5

4.	Group	Dennis Chastain	Tennessee Valley Authority	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	DeWayne Scott		SERC	1
2.	Ian Grant		SERC	3
3.	David Thompson		SERC	5
4.	Marjorie Parsons		SERC	6

5.	Group	Ben Engelby	ACES Standards Collaborators						X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
2.	William Hutchison	Southern Illinois Power Cooperative	SERC	1									
3.	Shari Heino	Brazos Electric Power Cooperative, Inc.	ERCOT	1, 5									
4.	John Shaver	Arizona Electric Power Cooperative/Southwest Transmission Cooperative, Inc.	WECC	1, 4, 5									
5.	Scott Brame	North Carolina Electric Membership Corporation	RFC	1, 3, 4, 5									
6.	Megan Wagner	Sunflower Electric Power Corporation	SPP	1									
6.	Group	Sasa Maljukan	Hydro One Networks Inc.	X									
	Additional Member	**Additional Organization**	**Region**	**Segment Selection**									
1.	David Kiguel	Hydro One Networks Inc.	NPCC	1									
7.	Group	Randi Heise	Dominion - NERC Compliance Policy	X		X		X	X				
	Additional Member	**Additional Organization**	**Region**	**Segment Selection**									
1.	Michael	Crowley	SERC	1, 3									
2.	MIke	Garton	MRO	5, 6									
3.	Connie	Lowe	RFC	5, 6									
4.	Louis	Slade	NPCC	5, 6									
5.	Randi	Heise	SERC	6									
8.	Individual	Janet Smith	Arizona Public Service Company	X		X		X	X				
9.	Individual	John Falsey	Invenergy LLC					X					
10.	Individual	Michelle R D'Antuono	Occidental Energy Ventures Corp.			X		X		X			
11.	Individual	Greg Froehling	Rayburn Country Electric Cooperative			X							
12.	Individual	Russ Schneider	Flathead Electric Cooperative, Inc.			X	X						
13.	Individual	Greg Froehling	Rayburn Country Electric Cooperative			X							
14.	Individual	Nazra Gladu	Manitoba Hydro	X		X		X	X				
15.	Individual	Wryan J. Feil	Northeast Utilities	X									
16.	Individual	Frederick R Plett	Massachusetts Attorney General								X		
17.	Individual	Mike Hendrix	Idaho Power Company	X									
18.	Individual	Michael Falvo	Independent Electricity System Operator		X								
19.	Individual	Thad Ness	American Electric Power	X		X		X	X				

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
20.	Individual	Karen Webb	City of Tallahassee					X					
21.	Individual	Bill Fowler	City of Tallahassee			X							
22.	Individual	Tiffany Lake	Westar Energy	X		X		X	X				
23.	Individual	Scott Langston	City of Tallahassee	X									
24.	Individual	Bret Galbraith	Seminole Electric			X	X	X	X				
25.	Individual	Kathleen Goodman	ISO New England Inc		X								
26.	Individual	Spencer Tacke	Modesto Irrigation District			X	X		X				
27.	Individual	Roger Dufresne	Hydro-QuÃ©bec Production					X					
28.	Individual	daniel mason	HHWP					X					
29.	Individual	Scott McGough	Geogia System Operations Corporation			X							
30.	Individual	Jason Snodgrass	Georgia Transmission Corporation	X									
31.	Individual	Rich Salgo	NV Energy	X		X		X					
32.	Individual	Patrick Brown	Canadian Electricity Association										

If you support the comments submitted by another entity and would like to indicate you agree with their comments, please select "agree" below and enter the entity's name in the comment section (please provide the name of the organization, trade association, group, or committee, rather than the name of the individual submitter).

Summary Consideration:

Organization	Agree	Supporting Comments of "Entity Name"
Modesto Irrigation District	Agree	IRC SRC

1. **Do you have any comments regarding the inclusion of the statutory definitions for Bulk-Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms?**

Summary Consideration:

Organization	Yes or No	Question 1 Comment
Hydro One Networks Inc.	No	Hydro One suggests that any definition and standards applicability considerations should account for the fact that NERC is the recognized ERO in areas that are beyond the Commission's jurisdiction and include Canada and parts of Mexico. With that in mind Hydro One suggests that the definition of the "Reliability Standard" is amended to replace "approved by the Commission" with "approved by Applicable Governmental Authorities"The proposed definition of the "Reliability Standard" uses extensively the lower cased term "bulk-power system" to align it with the Section 215 of Energy Policy Act. The term "bulk-power system" should be used only when referring to the interconnected grid in general. Bulk Electric System ("BES") is to be used in the context of NERC Reliability Standards. BES is a FERC and other applicable governmental authorities approved term. Furthermore, in Order 693, FERC found that "BES" was acceptable and should be used in the context of the applicability of Reliability Standards or NERC's monitoring and enforcement of compliance with the Reliability Standards. BES is the portion of the bulk power system to which standards apply and should be used when that specific meaning is intended. It is our belief that the Reliability Standards should apply to the BES as a subset of bulk-power system as defined in Section 215 of the Energy Policy Act. Using the "bulk-power system" introduces confusion and should be removed. According to the above, Hydro One recommends the

Organization	Yes or No	Question 1 Comment
		following definition of Reliability Standard:"Reliability Standard" means a requirement, approved by the governmental authority in each applicable jurisdiction, to provide for the reliable operation of the Bulk Electric System. The term includes requirements for the operation of existing Bulk Electric System facilities, including cyber security protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the Bulk Electric System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.
Response: Thank you for your comments. In order to clarify the meaning of "Commission" and "section" in the definition for Reliability Standard, language is being added to reflect that in the United States the Federal Energy Regulatory Commission ("FERC" or the "Commission") approves standards under Section 215 of the Federal Power Act. However, for other jurisdictions, the applicable governmental authority approves or recognizes standards. Further, in Order No. 693, FERC issued the directive to modify the NERC Glossary to include the Bulk-Power System ("BPS") definition which is being addressed through this project. Most Reliability Standards apply to the Bulk Electric System ("BES"), and recently FERC issued Order No. 773 which provides guidance on facilities that are part of the BES.		
Hydro-QuÃ©bec Production	No	Comments: The title of the Reliability Standard document is "Reliability Standards for the Bulk Electric Systems of North America". We are surprise that the "Reliability Standard" definition doesn't refer to the "Bulk Electric Systems", but only to the bulk-power-system. We think that this is confusing and RS definition should be revised to precise how it applies to BES facilities.
Response: Thank you for your comments. The Commission's directive in Oder No. 693 was to adopt the "statutory definitions" for the definitions presented in this project. BES is a subset of the BPS, so the terms are not interchangeable. Also, FERC recently issued Order No. 773 which provides guidance on facilities that are part of the BES.		
Geogia System Operations Corporation	No	The FERC Directive rests on a misunderstanding of the NERC standards development process. Terms are added to the glossary as they are

Organization	Yes or No	Question 1 Comment
		introduced in the development or revision of a standard; they are not added speculatively in anticipation that they will be used later, or retroactively to modify the meaning of a standard. The FERC directive to add these definitions should be taken as a directive to revise the affected standards using the statutory definitions and at that point add them to the glossary. Using this approach will provide industry the opportunity to focus on how utilizing these definitions might change the meaning of the affected standards. Through the standards development process it might be concluded that the statutory definition can be applied with no adverse consequences, resulting in a trivial revision of the standard (i.e. the addition of the term to the glossary and the capitalizing of the term in the standards). However it is also possible that the SDT and industry will conclude that additional changes to the standard are required to reflect the intended meaning of affected requirements in light of the new definition. Using the standards development process such changes could be made. If this SAR is approved there will be no such flexibility. The new definitions will be added as written with no opportunity for modification to the definitions or to standards that use these terms in the lower case. This would result in confusion about whether these definitions apply to non-capitalized terms that pre-date the definition. It could also lead to unintended consequences of applying a new definition to an existing requirement without a thorough vetting of the impact of the changes. Regarding the most recent efforts and subsequent FERC-approved "BES" definition as it resides in the NERC Glossary of Terms Used in NERC Reliability Standards, there remains confusion on behalf of industry as to the necessity of including the term of "BPS" in the Glossary. Specifically, in Order 693, FERC found that "BES" was acceptable and should be used in the context of the applicability of Reliability Standards or NERC's monitoring and enforcement of compliance with the Reliability Standards. Undue confusion would ensue with the proposed inclusion of the statutory

Organization	Yes or No	Question 1 Comment
		definition of "BPS" into the Glossary and its intended use by industry and any regulatory body. GSOC also has concerns with the reference to lower case "bps" within the statutory term "Reliability Standard" if approved within the NERC Glossary. Specifically, FERC has praised the clarity of the revised definition of BES and also clarified that Reliability Standards refer to the bulk electric system. The NERC defined term within the NERC glossary should be consistent with FERC and the industry's common understanding that Reliability Standards refer to the bulk electric system. Using the statutory definition without modification, only adds more confusion because lower case term "bps" does not equal BES, and would now introduces 3 terms that people will begin to ponder (BPS, BES, or bps). Therefore, GSOC proposes the following definition for Reliability Standard: o "Reliability Standard" means a requirement, approved by the Commission, to provide for Reliable Operation of the Bulk Electric System. The term includes requirements for the operation of existing Bulk Electric System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the Bulk Electric System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.
Response: Thank you for your comments. The Commission's directive in Oder No. 693 was to adopt the "statutory definitions," and since the BES is a subset of the BPS, the terms are not interchangeable. FERC has also provided guidance on the BES definition in Order No. 773. Further, these definitions will apply to terms that are currently capitalized in any Reliability Standard. Where a Reliability Standard includes a non-capitalized term, capitalization will be considered during the next standards development project involving the requirement.		
Invenergy LLC	No	
Manitoba Hydro	No	

Organization	Yes or No	Question 1 Comment
Westar Energy	No	
Northeast Power Coordinating Council	Yes	Should Reliability Standards apply only to the Bulk Electric System, or the Bulk Power System? The two definitions are redundant. All Reliability Standards should be consistent in the use of one term. It has been suggested that this reference to the Bulk Electric System might move to a totally different definition rather than keeping it "statutory".The definition for Reliability Standard "...does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity." It should also be stated that the ERO does not have the authority to dictate safety standards. It has been suggested by listing everything NERC/FERC can't do implies that what isn't mentioned means they can do it.The definition of Reliability Standard includes the phrase "...approved by the Commission under this section..." A footnote should be added to clarify that this is referring to Section 215 in the EPAct 2005.The definitions in Project 2012-08.1 are exactly as they appear in Section 215, which appears to be what FERC directed in Order 693 at 1894. The problem is that Reliability Standard is defined differently in the Rules of Procedure (see the following paragraph) which is a concern. There should not be multiple definitions of a term.Appendix 2 to the NERC Rules of Procedure (Effective march 5, 2013) "Reliability Standard" means a requirement to provide for Reliable Operation of the Bulk Power System, including without limiting the foregoing, requirements for the operation of existing Bulk Power System Facilities, including cyber security protection, and including the design of planned additions or modifications to such Facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge Bulk Power System Facilities or to construct new transmission capacity or generation capacity. A Reliability Standard shall not be effective in the United States until approved by the Federal Energy Regulatory Commission and shall not be

Organization	Yes or No	Question 1 Comment
		effective in other jurisdictions until made or allowed to become effective by the Applicable Governmental Authority.Suggest to include the following wording after each statutory definition listed (or add as a footnote) in the NERC Glossary of Terms "Definition": (Statutory Definition from Section 215 of the Federal Power Act of 2005 per FERC order 693.)The title of the Reliability Standard document is "Reliability Standards for the Bulk ElectricSystems of North America". It is surprising that the "Reliability Standard" definition doesn't refer to the "Bulk Electric Systems", but only to the bulk power system. We think that this is confusing and the Reliability Standard definition should be revised to be precise as to how it applies to BES facilities. The definition of Reliablity Standard is problematic. It should be reviewed in the context of the ERO being an International ERO. The revised definition implies approval by FERC is the only condition of a reliablity standard and the mention of Canadian jurisdictional approvals was entirely removed. Regarding the opening sentence in the same definition, "Reliablity Standard means a requirement...."--a standard is not a requirement in and of itself, and the language presents issues. The NPCC participating members suggest that any definition and standards applicability considerations should account for the fact that NERC is the recognized ERO in areas that are beyond the Commission's jurisdiction and include Canada and parts of Mexico. With that in mind suggest that the definition of the "Reliability Standard" is amended to replace "approved by the Commission" with "approved by Applicable Governmental Authorities".The proposed definition of the "Reliability Standard" uses extensively the lower case term "bulk-power system" to align it with the Section 215 of Energy Policy Act. The term "bulk-power system" should be used only when referring to the interconnected grid in general. Bulk Electric System ("BES") is to be used in the context of NERC Reliability Standards. BES is a FERC and other applicable governmental authorities approved term. Furthermore, in Order 693, FERC found that "BES" was acceptable

Organization	Yes or No	Question 1 Comment
		and should be used in the context of the applicability of Reliability Standards or NERC's monitoring and enforcement of compliance with the Reliability Standards. BES is the portion of the bulk power system to which standards apply and should be used when that specific meaning is intended. It is our belief that the Reliability Standards should apply to the BES as a subset of bulk-power system as defined in Section 215 of the Energy Policy Act. Using the "bulk-power system" introduces confusion and should be removed.According to the above, NPCC participating members recommend the following definition of Reliability Standard:"Reliability Standard" means a requirement, approved by the governmental authority in each applicable jurisdiction, to provide for the reliable operation of the Bulk Electric System. The term includes requirements for the operation of existing Bulk Electric System facilities, including cyber security protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the Bulk Electric System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.The definitions listed in the NERC Rules of Procedure (Appendix A) for Bulk-Power System, Reliability Standard, and Reliable Operation should be updated. The definitions should be identical to the definitions found in Section 215 of the Federal Power Act.
Response: Thank you for your comments. In order to clarify the meaning of "Commission" and "section" in the definition for Reliability Standard, language is being added to reflect that in the United States FERC approves standards under Section 215 of the Federal Power Act. However, for other jurisdictions, the applicable governmental authority approves or recognizes standards. Further, in Order No. 693, FERC issued the directive to modify the NERC Glossary to include the BPS definition which is being addressed through this project. Since BES is a subset of the BPS, the terms are not interchangeable. Therefore, both terms are necessary. Most Reliability standards will apply to the BES, and recently FERC issues Order No. 773 which provides guidance on facilities that are part of the BES. With regard to the Rules of Procedure ("ROP"), any future updates will be made through a separate project.		

Organization	Yes or No	Question 1 Comment
Duke Energy	Yes	In the definition of “Reliability Standard”, the phrase “this section” should be changed to “Section 215 of the Federal Power Act” for clarity.
Response: Thank you for your comments. In order to clarify the meaning of “Commission” and “section” in the definition for Reliability Standard, language is being added to reflect that in the United States FERC approves standards under Section 215 of the Federal Power Act. However, for other jurisdictions, the applicable governmental authority approves or recognizes standards.		
Bonneville Power Administration	Yes	BPA agrees with the drafting team's decision to propose definitions for Bulk-Power System, Reliability Standard, and Reliable Operation for inclusion in the NERC Glossary that are identical to the definitions found in Section 215 of the Federal Power Act. BPA believes that this approach is consistent with the Commission's directive in paragraph 1894 of Order 693 to "to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard."
Response: Thank you for your comments and your support of efforts of this project.		
Tennessee Valley Authority	Yes	These terms should be denoted in the NERC Glossary of Terms to identify the statutory nature/source. The glossary is currently divided into two sections: Continent-wide Terms and Regional Terms. A third section could be added for “United States Statutory Terms”, with these three definitions added to that section. Alternatively, if they are added to the “Continent-wide Terms” section of the glossary, they should be followed with a bracketed notation identifying the source.
Response: Thank you for your comments. In order to clarify the meaning of “Commission” and “section” in the definition for Reliability Standard, language is being added to reflect that in the United States FERC approves standards under Section 215 of the Federal Power Act. For other jurisdictions, the applicable governmental authority approves or recognizes standards. This clarifies that the terms are continent-wide.		

Organization	Yes or No	Question 1 Comment
ACES Standards Collaborators	Yes	(1) We do not understand why this is project has multiple phases. We recommend including all applicable statutory definitions in this phase of the project. Considering that this project is only adding existing terms to the glossary, we recommend including everything in a single phase. Please provide additional information about what the future phases would include.(2) Based on your project page we agree the reliability standards would only be applicable to theBulk Electric System.(3) These statutory definitions should be added to the Rules of Procedure Definition of Terms, not the Reliability Standards Glossary of Terms. Adding the statutory definitions to NERC's Rules of Procedure Definition of Terms would satisfy the FERC directive, because recent development of the Bulk Electric System definition had not occurred at the time of the directive, and the changes to the BES definition have caused enough confusion as the only glossary term. We are concerned that the introduction of BPS to the reliability standards glossary of terms would only add uncertainty to complying with reliability standards.(4) Thank you for the opportunity to comment.
Response: Thank you for your comments. This project is divided into phases to address all of the Glossary directives in Order No. 693. Also, the BPS definition is being added to the NERC Glossary to address the FERC directive in Order No. 694 that calls for the modification of the NERC Glossary to add the statutory definition of BPS. Finally, future updates to the ROP will be made through a separate project.		
NERC Compliance Policy	Yes	Dominion supports defining these terms as they as defined in Section 215 of the Federal Power Act (and copied below) : The term 'bulk-power system' means-(A) facilities and control systems necessary for operating an interconnectedelectric energy transmission network(or any portion thereof); and(B) electric energy from generation facilities needed to maintain transmissionsystem reliability.The term does not include facilities used in the local distribution of electric energy.The term 'reliability standard' means a requirement, approved by the Commissionunder this

Organization	Yes or No	Question 1 Comment
		section, to provide for reliable operation of the bulk-power system. The termincludes requirements for the operation of existing bulk-power system facilities,including cybersecurity protection, and the design of planned additions or modificationsto such facilities to the extent necessary to provide for reliable operation of the bulkpowersystem, but the term does not include any requirement to enlarge such facilities orto construct new transmission capacity or generation capacity.The term 'reliable operation' means operating the elements of the bulk-powersystem within equipment and electric system thermal, voltage, and stability limits so thatinstability, uncontrolled separation, or cascading failures of such system will not occur asa result of a sudden disturbance, including a cybersecurity incident, or unanticipatedfailure of system elements.Additionally, the 'background information' suggests that approving this project will "ensure both the NERC Glossary of Terms used in Reliability Standards and the NERC ROP contain consistent (identical) definitions for these terms." It should be noted that the term 'reliability standard' is defined differently in Appendix 2 of the NERC Rules of Procedure (ROP) (effective March 5, 2013). Dominion believes the statutory language should be used consistently and therefore suggests revising the ROP.
Response: Thank you for your comments and your support of this project. Also any future updates to the ROP will be made through a separate project.		
Arizona Public Service Company	Yes	AZPS agrees with the definitions for Bulk Power System and Reliability Standard. However, AZPS does not agree with the the definition of Reliable Operation because this includes a Cyber Security Incident. The scope of the Cyber Security Incident can be unlimited and can take multiple facilities out in a single incident. A cyber incident is beyond a normal operation or state and has further reaching impacts than operating limits, cascading failures, etc. It will be almost impossible or at best difficult to classify any operating

Organization	Yes or No	Question 1 Comment
		condition as “Reliable Operation” under this scenario.
Response: Thank you for your comments and your support of this project. The definition for Reliable Operation matches the statutory language found in Section 215 of the Federal Power Act, and cybersecurity incident cannot be removed without making a substantive change to the definition. Further, these definitions will apply to terms that are currently capitalized in any Reliability Standard. Reliable Operation is not currently capitalized in any of the Board-approved standards. However, capitalization/adoption of the definition will be considered during the next standards development project involving the requirement.		
Occidental Energy Ventures Corp.	Yes	Occidental Energy Ventures, Corp. (“OEVC”) agrees that the exact FPA language should be incorporated into the NERC Glossary. We appreciate the project team’s intent to add language to replace the cumbersome legal terminology, but believe that the FPA content was carefully crafted by the U.S. Congress - and the clarifications subtly modify their intent. For the same reason, the statutory terms incorporated into NERC’s Rules of Procedure (ROP) must be updated as well. We understand that the ROP was not in-scope for this exercise, but NERC must commit to a correction to eliminate all confusion. There is precedence where parallel modifications to the ROP have been made to align with a NERC project, so it does not seem that there should be a major barrier to this action.Although far more difficult, it would be beneficial for the project team make a firm statement back to NERC Leadership that the maintenance of two sets of definitions is problematic at best. This introduces uncertainty into the regulatory equation as industry stakeholders have no idea which terms will be used to monitor their compliance with reliability regulations. In fact, there is nothing that stops NERC and/or FERC to pick and choose when a definition applies - as captured in this paragraph in FERC Order 693:76. However, we disagree with NERC, APPA and NRECA that there is no intentional distinction between Bulk-Power System and bulk electric system. NRECA states that “[W]here Congress borrows terms of art in which are accumulated the legal tradition and meaning of centuries of practice, it

Organization	Yes or No	Question 1 Comment
		presumably knows and adopts the cluster of ideas that were attached to each borrowed word in the body of learning from which it was taken." In this instance, however, Congress did not borrow the term of art - bulk electric system - but instead chose to create a new term, Bulk-Power System, with a definition that is distinct from the term of art used by industry. In particular, the statutory term does not establish a voltage threshold limit of applicability or configuration as does the NERC definition of bulk electric system. Instead, section 215 of the FPA broadly defines the Bulk-Power System as "facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof) [and] electric energy from generating facilities needed to maintain transmission system reliability." Therefore, the Commission confirms its statements in the NOPR that the Bulk-Power System reaches farther than those facilities that are included in NERC's definition of the bulk electric system.In our view, this interpretation of the FPA essentially leaves no limits to FERC's oversight provide a link to Bulk-Power System reliability is made. In fact, the Commission essentially stated this was the case in their recent approval of the definition of the BES. Although this flexibility may make sense to the regulatory bodies so they may adapt their scope as new reliability threats are discovered, it greatly increases the industry's uncertainty. After all if a violation can be found to "BPS Reliability" that is nowhere to be found in a NERC Reliability Standard, then we have no idea where to prioritize our scarce resources. This only adds risk to the reliability of the wide-area power system - no matter what it is called.
Response: Thank you for your comments and your support of this project. Any future updates to the ROP will be addressed through a separate project.		
Rayburn Country Electric Cooperative	Yes	I belive in addition to Bulk Power System a clear definition of "Local Distribution" is necessary to complete the big picture.We have Bulk Power

Organization	Yes or No	Question 1 Comment
		System, Bulk Electric System both of which mention “Local Distribution”. But Local Distribution is not yet officially defined. If it is not defined now, it will need to be defined eventually.
Response: Thank you for your comments. Any future amendments to the Glossary would be considered in a future project.		
Flathead Electric Cooperative, Inc.	Yes	The inclusion of Bulk-Power System appears to be without any explanation of th erelation of the term to the Bulk Electric System. A glossary definition that ignores this obvious inconssistncy does not seem to add value. There should at least be an acknowledgment of the interplay somehow.
Response: Thank you for your comments. The BES is a subset of the BPS, and FERC has provided more guidance on facilities that comprise the BES in Order No. 773.		
Northeast Utilities	Yes	NU suggests that the first sentence of the definition for “Reliability Standard” should be re-worded to eliminate the phrase “under this section” since this phrase is ambiguous. The suggested changes should be as follows:”Reliability Standard” means a requirement, approved by the Commission (under Section 215 of the Federal Power Act), to provide for reliable operation of the bulk-power system. The term...
Response: Thank you for your comments. In order to clarify the meaning of “Commission” and “section” in the definition for Reliability Standard, language is being added to reflect that in the United States FERC approves standards under Section 215 of the Federal Power Act. However, for other jurisdictions, the applicable governmental authority approves or recognizes standards.		
Massachusetts Attorney General	Yes	I have a problem with the Reliable Operation definition due to the words "will not occur as a result of a sudden disturbance" with no caveats at all. If it said "will not occur within design parameters as a result of a sudden disturbance" with design parameters pointing to N-1-1 conditions, or some such construction, my objection would disappear, but as written, it is too absolute and will require reliability even under the most distressed

Organization	Yes or No	Question 1 Comment
		conditions, conditions which the system was not and should not be designed for.
Response: Thank you for your comments. The definitions currently match the statutory language in Section 215 of the Federal Power Act. Any future amendments to the Glossary would be considered in a future project.		
Idaho Power Company	Yes	Having separate definitions for BPS and BES still creates an element of confusion but amending the initial draft to now match the statutory language found in Section 215 of the FPA eliminates additional confusion.
Response: Thank you for your comments. The BES is a subset of the BPS, and FERC has provided more guidance on facilities that are part of the BES in Order No. 773.		
Independent Electricity System Operator	Yes	The IESO has concerns with the proposed definition of Reliability Standard. This definition is is virtually the same as the current definition in the NERC Rules of Procedure in terms of content, except that it now adds that a standard is "approved by the Commission under this section", and ignores the recognition of other jurisdictions by excluding the original wording that "A reliability standard shall not be effective in the United States until approved by the FERC and shall not be effective in other jurisdictions until made or allowed to become effective by the applicable governmental authority." We believe a reliability standard, in its general definition, establishes a set of technical or performance requirements to measure the reliability of the bulk power system (and it is something NERC defines and approves), and that it becomes mandatory and effective when approved by the applicable regulatory authority in each jurisdiction. We recommend that ,if NERC is to include the definition of Reliability Standard in its glossary of terms, it should use the definition in its Rules of Procedure instead.
Response: Thank you for your comments. In order to clarify the meaning of "Commission" and "section" in the definition for Reliability Standard, language is being added to reflect that in the United States FERC approves standards under Section 215 of the		

Organization	Yes or No	Question 1 Comment
Federal Power Act. However, for other jurisdictions, the applicable governmental authority approves or recognizes standards.		
American Electric Power	Yes	We are confused by the de-capitalization of Reliable Operation and Bulk-Power System in this most recent draft. What is the intent of doing so? In the previous draft, it was more clear that the definitions were interdependent. That is no longer the case. Though we previously voted in the affirmative, this most recent change has driven our decision to vote negative this comment period.Regarding the proposed definition of "Bulk-Power System", AEP believes it is misplaced to emphasize electric energy rather than generation facilities in B), and propose using "generation facilities producing the electric energy needed...".With regard to the definition of "Reliability Standard", AEP once again recommends using a different word in place of the lower case "requirement" to avoid confusing it with the defined term "Requirement". In addition, NERC may want to consider including planning and maintenance as part of this definition, going beyond operations only.
Response: Thank you for your comments. The current definitions match the statutory language found in Section 215 of the Federal Power Act. Also, the terms Reliable Operation and Bulk-Power System as referenced in the definitions will be capitalized once the Board has adopted both terms.		
City of Tallahassee	Yes	TAL is uncomfortable with the potential for unintended consequences resulting from the wording of the proposed BPS definition. 'Electric energy from generation facilities needed to maintain transmission system reliability' does not specify which portion of the generator output is to support reliability, versus that which is designated to serve customer load. It is unknown how entities could differentiate.
Response: Thank you for your comments. The current definitions match the statutory language found in Section 215 of the Federal Power Act.		

Organization	Yes or No	Question 1 Comment
Seminole Electric	Yes	Seminole reasons that the SDT has taken an incorrect step by "lower-casing" the previously capitalized, and therefore defined terms, which are utilized to define the three additional terms cited in Section 215(a) of the Federal Power Act (FPA), i.e., Bulk-Power System, Reliability Standard, and Reliable Operation. The NERC SDT originally proposed definitions which included capitalized terms in the initial ballot for this Project, and then the NERC SDT proposed lower-casing those terms in this Successive Ballot action. Seminole acknowledges that when Congress passed Title XII of the Energy Policy Act of 2005 (EPAct) which included these terms, that Congress did not capitalize the terms at issue. Part of the reason these terms were not capitalized was because FERC via NERC had not defined and approved some of these terms until 2007. With that said, Seminole reasons that the NERC STD should only add definitions to the NERC Glossary that are: (1) effective, (2) meet the intent of Congress, and (3) are clear and unambiguous and provide due process to the regulated community.1.EffectiveThe three terms being added are constructed with words that are now undefined. Seminole reasons that the lower-casing of such words, which now breaks their reference to NERC defined terms, diminishes the effectiveness of the three terms being proposed for addition. If these terms are not clearly defined, then NERC will not be able to enforce these definitions for reasons cited later in these comments. This action appears to be purely ministerial - add three terms that Congress directed to be added, even if the terms are not clearly defined. Seminole reasons that Congress would have wanted NERC to have definitions that could be enforced and utilized. Seminole does not believe these definitions will be effective additions to the Glossary and that the NERC SDT should recapitalize the NERC defined terms within the proposed terms to be added to the NERC Glossary in this Project.2.Intent of CongressIf the three terms being added - Bulk-Power System, Reliability Standard, and Reliable Operation, are approved as proposed, Seminole reasons that Congress'

Organization	Yes or No	Question 1 Comment
		intent will not be met. For example, for the term "Reliable Operation," the NERC STD has lower-cased the terms "elements," "cascading," "bulk-power system," and "cybersecurity incident." Per the NERC Rules of Procedure, if these terms are not capitalized, then these terms do not refer to NERC defined terms. This instruction has been conveyed in multiple NERC documents. Therefore, NERC is specifically saying for example, that the word "bulk-power system" listed in the definition for Reliable Operation does not refer to the defined term "Bulk-Power System" which is being added by this exact Project. Seminole does not believe this was the intent of Congress. Seminole reasons that the NERC SDT should capitalize those terms that are already defined in the NERC Glossary as Seminole believes that such action would be more in line with the intent of Congress.3.Clear, Unambiguous, and Provide Due Process In this action, the NERC SDT has lower-cased such words as "facilities" and "elements." These are currently defined terms in the NERC Glossary. As stated previously, if these terms are not capitalized, then these terms are explicitly not referencing the defined terms. If such is the case, then the terms being defined are not clear and unambiguous and Seminole does not reason that FERC will approve such vague definitions even if they are directly from Congress. As you are aware, there must be due process provided to the regulated industry via the Administrative Procedure Act. Seminole reasons that the NERC SDT, in an effort to provide due process and clarity, referenced the NERC defined terms that make up the proposed definitions. Now, the NERC SDT has removed that clarity from the proposed definition. Seminole believes that the capitalized terms, the defined terms, should once again be added to the definitions. If the NERC SDT does not capitalize these terms, Seminole does not believe that such definitions will pass FERC approval under this reasoning.
Response: Thank you for your comments. The current definitions match the statutory language found in Section 215 of the Federal Power Act. Also, the terms Reliable Operation and Bulk-Power System as referenced in the definitions will be capitalized		

Organization	Yes or No	Question 1 Comment
once the Board has adopted both terms.		
Modesto Irrigation District	Yes	I believe it is critical that the phrase "and NERC Reliability Standards," be inserted after the phrase "stability limits" in the definition of "Reliable Operation" paragraph. Otherwise, the "Reliable Operation" paragraph you are proposing to insert into the NERC Glossary of Terms, may in itself override the entire set of NERC Reliability Standards.Also, for clarity, I would suggest that the word "Commission", as used in the "Reliability Standard" definition paragraph, be clearly defined as "Federal Energy Regulatory Commission", if that is the intent.Thank you.
Response: Thank you for your comments. The definition for Reliable Operation matches the statutory definition found in Section 215 of the Federal Power Act. Inserting "and NERC Reliability Standards" would be a substantive change to the FERC directive. However, clarifying language will be added to explain in the United States, Commission means FERC. For other jurisdictions, the applicable governmental authority approves or recognizes the Reliability Standard.		
HHWP	Yes	The confusion remains between the meaning of "BPS" and BES. If BPS=BES, the glossary of terms definitions for both should be the same. If BPSâ‰ BES, then the difference in meaning should be included as part of the glossary definition of BPS. The proposed BPS definition remains unclear and therefore should not be used in the glossary.The definition of "Reliable Operation" ignores the one of the two aspects of reliability that was identified in NERC's December 2007 Reliability Concepts document. The definition appears only to address interconnection integrity and does not include the reliability effects arising from failure a protect equipment that can impact system reliability is the operating, but not real-time horizon.
Response: Thank you for your comments. The definitions being added match the statutory language found in Section 215 of the Federal Power Act. The definition for BPS is being added to address a FERC directive from Order No. 693. BES does not equate to the BPS, and the BES is a subset of the BPS. Further, the Commission has also provided guidance on what facilities comprise the BES in Order No. 773.		

Organization	Yes or No	Question 1 Comment
Georgia Transmission Corporation	Yes	The introduction to the NERC Glossary states "This Glossary lists each term that was defined for use in one or more of NERC's continent-wide or Regional Reliability Standards...". Terms are added to the glossary as they are introduced in the development or revision of a standard; they are not added speculatively in anticipation that they will be used later, or retroactively to modify the meaning of a standard. Currently, out of all 1,663 requirements in the latest VRF Standards Applicability Matrix, only one requirement, PRC-006-SERC-01 R1 uses the term "BPS". Consequently, this capitalized term BPS was not introduced during the development of PRC-006-SERC-01 R1, and GTC recommends this item be added to the "Issues Database" for further review on how utilizing this proposed statutory definition of BPS might change the meaning of this affected standard.As mentioned in paragraph 1894 listed in the SAR, "the Reliability Standards refer to the bulk electric system, which is also defined in the glossary." Inserting the proposed statutory definitions without modification could have a negative impact and conflicting circular references between the two terms BPS and BES when the statutory definition for the term "Reliability Standard" only captures the term "bps". Again, this would be inconsistent with the stated purpose of the NERC Glossary identified above and contradictory to FERC's common statement "...the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."Accordingly, GTC has concern there is a potential risk of expanding jurisdictional exposure to Reliability Standards once the statutory term "BPS" is approved within the NERC Glossary. GTC fears that uninformed future drafting team members may begin to reference BPS in future revisions of requirements that are currently limited to the BES, because it would be a term available within the NERC Glossary but may not recall FERC's documented statement "....the Reliability Standards refer to the bulk electric system...". GTC proposes the following note be added to the proposed definition to control this unintended, yet probable

Organization	Yes or No	Question 1 Comment
		consequence: o “Bulk-Power System” means, A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy. Note - FERC has directed the inclusion of the statutory definition of Bulk-Power System to the NERC Glossary, but highlights that the Reliability Standards refer to the bulk electric system, which is also defined in the glossary.GTC also has concerns with the reference to lower case “bps” within the statutory term “Reliability Standard” if approved within the NERC Glossary. Specifically, FERC has praised the clarity of the revised definition of BES and also clarified that Reliability Standards refer to the bulk electric system. The NERC defined term within the NERC glossary should be consistent with FERC and the industry’s common understanding that Reliability Standards refer to the bulk electric system. Using the statutory definition without modification, only adds more confusion because lower case term “bps” does not equal BES, and would now introduces 3 terms that people will begin to ponder (BPS, BES, or bps). Therefore, GTC proposes the following definition for Reliability Standard: o “Reliability Standard” means a requirement, approved by the Commission, to provide for Reliable Operation of the Bulk Electric System. The term includes requirements for the operation of existing Bulk Electric System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the Bulk Electric System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.
Response: Thank you for your comments. The definitions proposed match the statutory definition in Section 215 of the Federal Power Act. Also, this project will address the FERC directive Order No. 693 to adopt the statutory definitions of Bulk-Power System, Reliability Standard, and Reliable Operation. Further, these definitions will apply to terms that are currently capitalized		

Organization	Yes or No	Question 1 Comment
in any Reliability Standard. Where a Reliability Standard includes a non-capitalized term, capitalization will be considered during the next standards development project involving the requirement. Also, the terms Reliable Operation and Bulk-Power System as referenced in the definitions will be capitalized once the Board has adopted both terms.		
Canadian Electricity Association	Yes	CEA's comments focus specifically on the proposal for the definition of "Reliability Standard" in the NERC Glossary of Terms to match the language in the U.S. Federal Power Act verbatim. CEA has two concerns with the proposal. First and foremost, CEA is concerned that the definition would not be applicable to, workable for or respectful of registered entities in Canada. The proposed definition does not capture and convey that many Canadian provincial government authorities, separate and apart from any FERC approval process, approve Reliability Standards or allow Reliability Standards to take effect in their respective jurisdictions. CEA does not believe it is appropriate for a term that is such a fundamental component of the broader North American electric reliability regime and lexicon to be defined in such a way that is applicable to only one jurisdiction. CEA respectfully requests that clarifying language be added to the proposed definition of "Reliability Standard" so that the definition correctly acknowledges how Reliability Standards are approved or recognized in jurisdictions other than the United States. Such modification will ensure that the definition in the Glossary is workable for all of NERC's registered entities in North America. CEA believes that such modification would not represent a substantive change to the proposed definition of "Reliability Standard," given that it would not modify the definition of what Reliability Standards are comprised of or what they seek to achieve. Accordingly, such non-substantive modification would not represent a deviation from FERC's directive, but rather enables NERC to comply with the directive in an equally efficient and effective manner, that ensures total accuracy and precision in the definition.In addition, CEA notes that other clarifying modifications are necessary in the proposed definition of "Reliability Standard." The word "Commission" and phrase "under this section" do not

Organization	Yes or No	Question 1 Comment
		correspond to other defined terms in the NERC Glossary. As such, their inclusion would cause the definition of "Reliability Standard" in the Glossary to be confusing and lacking coherence. CEA believes that these words should be modified, consistent with the other modification suggested above.
Response: Thank you for your comments. In order to clarify the meaning of "Commission" and "section" in the definition for Reliability Standard, language is being added to reflect that in the United States FERC approves standards under Section 215 of the Federal Power Act. However, for other jurisdictions, the applicable governmental authority approves or recognizes standards.		

END OF REPORT

Exhibit D

Record of Development of Proposed NERC Glossary Terms

Project 2012-08.1
Phase 1 of Glossary Updates: Statutory Definitions

Related Files

Status:
Adopted by the Board of Trustees on May 9, 2013 and pending regulatory approval.

Purpose/Industry Need:
To satisfy FERC Order 693, paragraph "1894 - The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

Background:
In paragraph 1894 of Federal Energy Regulatory Commission (FERC) Order 693, the Commission directed the Electric Reliability Organization to include the statutory definitions of the Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards. Inclusion of these statutory definitions in the NERC Glossary of Terms used in Reliability Standards will address these outstanding Commission directives. The proposed definitions for Bulk-Power System, Reliability Standard, and Reliable Operation are identical to the definitions found in Section 215 of the Federal Power Act.

Draft	Action	Dates	Results	Consideration of Comments
Implementation Plan Clean **(23)** | Redline to Last Posted **(24)** Roadmap Clean **(25)** | Redline to Last Posted **(26)**	Recirculation Ballot Info **(27)** Vote>>	04/18/13 - 04/29/13 (closed)	Summary **(28)** Ballot Results **(29)**	
Implementation Plan Clean **(11)** |	Successive Ballot Updated Info **(16)**	03/13/13 - 03/22/13 (closed)	Summary **(19)** Ballot Results **(20)**	

Redline to Last Posted **(12)** Roadmap Clean **(13)**| Redline to Last Posted **(14)** **Supporting Documents:** Unofficial Comment Form (Word) **(15)**	Info **(17)** Vote>>			
	Comment Period Info **(18)** Submit Comments>>	02/21/13 - 03/22/13 (closed)	Comments Received **(21)**	Consideration of Comments>> **(22)**
SAR **(1)** Implementation Plan **(2)** Roadmap **(3)**(Revised: 07/11/12) **Supporting Documents:** Unofficial Comment Form (Word) **(4)**	Initial Ballot Updated Info **(5)** Info **(6)** Vote	07/24/12 - 08/02/12 (closed)	Ballot Results **(8)**	
	Info **(7)** Submit Comments>>	06/19/12 - 08/02/12 (closed)	Comments Received **(9)**	Consideration of Comments **(10)**
	Join Ballot Pool>>	06/19/12 - 07/18/12 (closed)		

E-mail completed form to
sarcomm@nerc.com

Standard Authorization Request Form

Request Date	March 15, 2012

SAR Requester Information	**SAR Type** (*Check a box for each one that applies.*)	
Individual, Group, or Committee Name David Taylor	☐	New Standard
Primary Contact (if Group or Committee)	☐	Revision to existing Standard
Company or Group Name NERC	☐	Withdrawal of existing Standard
E-mail David.Taylor@nerc.net	☐	Project Identified in Reliability Standards Development Plan (Project Number and Name:)
Telephone (609) 651-5089	☒	Modification to NERC Glossary term or addition of new term

Brief Description of Proposed Standard Modifications / Actions

The Federal Energy Regulatory Commission (FERC) issued directives in FERC Order 693 requiring the addition of the statutory definitions for Bulk Power System, Reliable Operation, and Reliability Standard to the Glossary of Terms used in Reliability Standards. The purpose of this SAR is to add the definitions to the glossary.

Need

By adding the definitions for Bulk Power System, Reliable Operation, and Reliability Standard to the Glossary of Terms used in Reliability Standards, NERC will be complying with mandatory directives in Order 693 issued by FERC.

Goals

The definitions for Bulk Power System, Reliable Operation, and Reliability Standard will be added to the Glossary of Terms used in Reliability Standards.

Objectives and / or Potential Future Metrics

The criteria for success will be regulatory approval of the statutory definitions for Bulk Power System, Reliable Operation, and Reliability Standard being added to the Glossary of Terms used in Reliability Standards.

Detailed Description

In Paragraph 1894 of Order 693, the Commission directed the Electric Reliability Organization to include the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards:

> "1894. The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to include the stautory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

Inclusion of the proposed terms for Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards will address three outstanding Commission directives.

On November 29, 2011, NERC submitted a petition to the Commission requesting approval of revisions to NERC's Rules of Procedure (ROP), including revisions to Sections 100 through 1600 of the ROP and Appendices 3A, 3B, 3C, 3D, 4A, 4B, 4C, 4D, 4E, 5A, 5B, 6 and 8, and a new Appendix 2, *Definitions Used in the Rules of Procedure*. The purposes of the proposed revisions were (1) to place all definitions of defined terms used anywhere in the ROP in a single, readily-accessible location (proposed new Appendix 2); (2) to capitalize defined terms throughout the ROP where such terms are intended to be used in their defined meanings; and (3) to lower-case other terms that are currently capitalized in the ROP but are not defined terms.

On January 31, 2012, the Commission issued an Order approving NERC's November 29, 2011 request.

The proposed definitions for Bulk Power System, Reliability Standard, and Reliable Operation below, even though not identical to the statutory terms included in Section 215(a) of the Federal Power Act, are identical to the definitions approved by the Commission in their January 31, 2012 Order; and, therefore, are an equally efficient and effective response to the Commission's directives from Order 693.

The following definitions should be added to the NERC Glossary of Terms Used in Reliability Standards in order to comply with the FERC directives in Paragraph 1894 of Order 693:

- **"Bulk Power System"** means, depending on the context: (i) Facilities and control systems necessary for operating an interconnected electric energy supply and transmission network (or any portion thereof), and electric energy from generating facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.
- **"Reliability Standard"** means a requirement to provide for Reliable Operation of the Bulk Power System, including without limiting the foregoing, requirements for the operation of existing Bulk Power System Facilities, including cyber security protection, and including the design of planned additions or modifications to such Facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge Bulk Power System Facilities or to construct new transmission capacity or generation capacity. A Reliability Standard shall not be effective in the United States until approved by the Federal Energy Regulatory Commission and shall not be effective in other jurisdictions until made or allowed to become effective by the Applicable Governmental Authority.
- **"Reliable Operation"** means operating the Elements of the Bulk Power System within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or Cascading failures of such system will not occur as a result of a sudden disturbance, including a Cyber Security Incident, or unanticipated failure of system Elements.

As the definitions for Bulk Power System, Reliable Operation, and Reliability Standard proposed here are identical to the definitions approved by the Commission in their January 31, 2012 Order, no changes should be made to the definitions. It is recommended that the Standards Committee waive the requirement for posting for industry comment and that the definitions go straight to industry ballot.

OPTIONAL: Technical Analysis Performed to Support Justification N/A

Reliability Functions

The Standard(s) May Apply to the Following Functions *(Check box for each one that applies.)*		
☒	Regional Entity	Conducts the regional activities related to planning and operations, and coordinates activities of Responsible Entities to secure the reliability of the Bulk Electric System within the region and adjacent regions.
☒	Reliability Coordinator	Responsible for the real-time operating reliability of its Reliability Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view.
☒	Balancing Authority	Integrates resource plans ahead of time, and maintains load-interchange-resource balance within a Balancing Authority Area and supports Interconnection frequency in real time.
☒	Interchange Authority	Ensures communication of interchange transactions for reliability evaluation purposes and coordinates implementation of valid and balanced interchange schedules between Balancing Authority Areas.
☒	Planning Coordinator	Assesses the longer-term reliability of its Planning Coordinator Area.
☒	Resource Planner	Develops a >one year plan for the resource adequacy of its specific loads within a Planning Coordinator area.
☒	Transmission Planner	Develops a >one year plan for the reliability of the interconnected Bulk Electric System within its portion of the Planning Coordinator area.
☒	Transmission Service Provider	Administers the transmission tariff and provides transmission services under applicable transmission service agreements (e.g., the pro forma tariff).
☒	Transmission Owner	Owns and maintains transmission facilities.
☒	Transmission Operator	Ensures the real-time operating reliability of the transmission assets within a Transmission Operator Area.
☒	Distribution Provider	Delivers electrical energy to the End-use customer.
☒	Generator Owner	Owns and maintains generation facilities.
☒	Generator Operator	Operates generation unit(s) to provide real and reactive power.
☒	Purchasing-Selling Entity	Purchases or sells energy, capacity, and necessary reliability-related services as required.
☒	Market Operator	Interface point for reliability functions with commercial functions.
☒	Load-Serving Entity	Secures energy and transmission service (and reliability-related services) to serve the End-use Customer.

Reliability and Market Interface Principles

Applicable Reliability Principles *(Check box for all that apply.)*	
☐	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
☐	2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
☐	3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.
☐	4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.
☐	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.
☐	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
☐	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
☐	8. Bulk power systems shall be protected from malicious physical or cyber attacks.

Does the proposed Standard(s) comply with all of the following Market Interface Principles? *(Select 'yes' or 'no' from the drop-down box.)*
1. A reliability standard shall not give any market participant an unfair competitive advantage. Yes
2. A reliability standard shall neither mandate nor prohibit any specific market structure. Yes
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard. Yes
4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. Yes

Related Standards

Standard No.	Explanation

Related Projects

Project ID and Title	Explanation

Regional Variances

Region	Explanation
ERCOT	
FRCC	
MRO	
NPCC	
SERC	
RFC	
SPP	
WECC	

Implementation Plan
2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Requested Approvals
It is requested that the following definitions be approved for addition to the NERC Glossary of Terms used in Reliability Standards:

- "Bulk Power System" means, depending on the context: (i) Facilities and control systems necessary for operating an interconnected electric energy supply and transmission network (or any portion thereof), and electric energy from generating facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

- "Reliability Standard" means a requirement to provide for Reliable Operation of the Bulk Power System, including without limiting the foregoing, requirements for the operation of existing Bulk Power System Facilities, including cyber security protection, and including the design of planned additions or modifications to such Facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge Bulk Power System Facilities or to construct new transmission capacity or generation capacity. A Reliability Standard shall not be effective in the United States until approved by the Federal Energy Regulatory Commission and shall not be effective in other jurisdictions until made or allowed to become effective by the Applicable Governmental Authority.

- "Reliable Operation" means operating the Elements of the Bulk Power System within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or Cascading failures of such system will not occur as a result of a sudden disturbance, including a Cyber Security Incident, or unanticipated failure of system Elements.

Requested Retirements
No Reliability Standards or definitions are requested to be retired with the approval of the addition of the definitions for Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards.

Prerequisite Approvals
No Reliability Standard or definition is under development that must be completed or implemented before the definitions for Bulk Power System, Reliability Standard, and Reliable Operation can be added to the NERC Glossary of Terms used in Reliability Standards.

Background

In Paragraph 1894 of the Federal Energy Regulatory Commission (FERC) Order 693, the Commission directed the Electric Reliability Organization to include the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards:

"1894. The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

The statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation are contained in the Electricity Modernization Act of 2005. Inclusion of the statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards will address three outstanding Commission directives.

The statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation contained in the Electricity Modernization Act of 2005 were previously submitted by NERC in a petition to FERC, dated November 29, 2011. The petition requested approval of numerous revisions to NERC's Rules of Procedure (ROP); including, but not limited to, a new Appendix 2 to the ROP, *Definitions Used in the Rules of Procedure*. On January 31, 2012, the Commission issued an Order approving NERC's November 29, 2011, request.

The proposed definitions for Bulk Power System, Reliability Standard, and Reliable Operation are identical to the definitions approved by the Commission in their January 31, 2012 Order and are responsive to the Commission's directives from Paragraph 1894 of Order 693. Approval of the proposed definitions for Bulk Power System, Reliability Standard, and Reliable Operation also ensures both the NERC Glossary of Terms used in Reliability Standards and the NERC ROP contain consistent (identical) definitions for these terms.

Effective Date

The definitions of Bulk Power System, Reliability Standard, and Reliable Operation shall be added to the NERC Glossary of Terms used in Reliability Standards effective upon applicable regulatory approval.

2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

Development Steps Completed

1. The Standards Committee (SC) authorized NERC posting a Standard Authorization Request (SAR) for adding the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards for a 45-day formal comment period, with an initial ballot during the final 10 days of that comment period. Standards Committee authorization occurred during the May 10, 2012 SC meeting.

Description of Current Draft

This is the initial posting and ballot for adding the statutory definitions (without modification) of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards for a 45-day formal comment period, with an initial ballot during the final 10 days of that comment period.

Anticipated Actions	Anticipated Date
45-day Formal Comment Period with Parallel Initial Ballot	June 2012
Recirculation ballot	September 2012
BOT adoption	November 2012

Effective Dates

The definitions of Bulk Power System, Reliability Standard, and Reliable Operation shall be added to the NERC Glossary of Terms used in Reliability Standards effective upon applicable regulatory approval.

Version History

Version	Date	Action	Change Tracking

1	TBD	Addition of the definitions of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards.	N/A

Definitions of Terms Used in Standard

This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.

"Bulk Power System" means, depending on the context: (i) Facilities and control systems necessary for operating an interconnected electric energy supply and transmission network (or any portion thereof), and (ii) electric energy from generating facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

NOTE: The highlighted '(ii)' was inadvertently omitted in the original posted document, but is part of the statutory definition of Bulk Power System included in the Energy Policy Act of 2005.

"Reliability Standard" means a requirement to provide for Reliable Operation of the Bulk Power System, including without limiting the foregoing, requirements for the operation of existing Bulk Power System Facilities, including cyber security protection, and including the design of planned additions or modifications to such Facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge Bulk Power System Facilities or to construct new transmission capacity or generation capacity. A Reliability Standard shall not be effective in the United States until approved by the Federal Energy Regulatory Commission and shall not be effective in other jurisdictions until made or allowed to become effective by the Applicable Governmental Authority.

"Reliable Operation" means operating the Elements of the Bulk Power System within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or Cascading failures of such system will not occur as a result of a sudden disturbance, including a Cyber Security Incident, or unanticipated failure of system Elements.

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Project 2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Unofficial Standard Comment Form

Please **DO NOT** use this form for submitting comments. Please use the electronic form to submit comments on the Standard. The electronic comment form must be completed by 8 p.m. ET **August 2, 2012**.

If you have questions please contact David Taylor at David.Taylor@nerc.net or by telephone at 202-644-8089.

Project Page

Background Information

This posting is soliciting formal comment.

In Paragraph 1894 of the Federal Energy Regulatory Commission (FERC) Order 693, the Commission directed the Electric Reliability Organization to include the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards:

> "1894. The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

The statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation are contained in the Electricity Modernization Act of 2005. Inclusion of the statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards will address three outstanding Commission directives.

The statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation contained in the Electricity Modernization Act of 2005 were previously submitted by NERC in a petition to FERC,

dated November 29, 2011. The petition requested approval of numerous revisions to NERC's Rules of Procedure (ROP); including, but not limited to, a new Appendix 2 to the ROP, *Definitions Used in the Rules of Procedure*. On January 31, 2012, the Commission issued an Order approving NERC's November 29, 2011 request.

The proposed definitions for Bulk Power System, Reliability Standard, and Reliable Operation are identical to the definitions approved by the Commission in their January 31, 2012 Order and are responsive to the Commission's directives from Paragraph 1894 of Order 693. Approval of the proposed definitions for Bulk Power System, Reliability Standard, and Reliable Operation also ensures both the NERC Glossary of Terms used in Reliability Standards and the NERC ROP contain consistent (identical) definitions for these terms.

The following definitions are proposed to be added to the NERC Glossary of Terms used in Reliability Standards in order to comply with the FERC directives in Paragraph 1894 of Order 693:

- **"Bulk Power System"** means, depending on the context: (i) Facilities and control systems necessary for operating an interconnected electric energy supply and transmission network (or any portion thereof), and electric energy from generating facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

- **"Reliability Standard"** means a requirement to provide for Reliable Operation of the Bulk Power System, including without limiting the foregoing, requirements for the operation of existing Bulk Power System Facilities, including cyber security protection, and including the design of planned additions or modifications to such Facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge Bulk Power System Facilities or to construct new transmission capacity or generation capacity. A Reliability Standard shall not be effective in the United States until approved by the Federal Energy Regulatory Commission and shall not be effective in other jurisdictions until made or allowed to become effective by the Applicable Governmental Authority.

- **"Reliable Operation"** means operating the Elements of the Bulk Power System within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or Cascading failures of such system will not occur as a result of a sudden disturbance, including a Cyber Security Incident, or unanticipated failure of system Elements.

As the proposed definitions for Bulk Power System, Reliable Operation, and Reliability Standard are the statutory definitions for these terms contained in the Electricity Modernization Act of 2005 and are identical to the definitions approved by the Commission in their January 31, 2012 Order, NERC is proposing to make no modifications to the statutory definitions already approved in the ROP. The outstanding FERC directive requires..."the ERO to modify the glossary through the Reliability Standards development process."

On May 10, 2012, the Standards Committee (SC) authorized posting the Standard Authorization Request (SAR) for adding the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards for a 45-day formal comment period, with an initial ballot during the final 10 days of that comment period.

Enter All Comments in Simple Text Format. Bullets, numbers, and special formatting will not be retained.

Do you have any comments regarding the inclusion of the statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards?

☐ Yes

☐ No

Comments:

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Standards Announcement

Project 2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Initial Ballot Open through 8 p.m. Thursday, August 2, 2012

Now Available

An initial ballot for **Phase 1 of the Glossary Updates for Statutory Definitions** is open through **8 p.m. Eastern on Thursday, August 2, 2012.**

Instructions

Members of the ballot pool associated with this project may log in and submit their vote for inclusion of three statutory definitions, for *Bulk Power System*, *Reliability Standard*, and *Reliable Operation* in the NERC Glossary of Terms by clicking here.

Members of the ballot pool and other stakeholders may submit their comments via the electronic comment form.

Next Steps

The Standards Committee approved posting of these definitions for a parallel 45-day comment period and initial ballot in order to address three outstanding directives from Order 693. The NERC Standard Processes Manual calls for definitions that are added to the NERC Glossary to be balloted in the same manner as reliability standards. Because the proposed definitions for Bulk Power System, Reliable Operation, and Reliability Standard are the statutory definitions for these terms contained in the Electricity Modernization Act of 2005, the Standards Committee determined that it was not necessary to form a drafting team and has asked NERC staff to respond to comments from the formal comment period and initial ballot, and post the definitions for a recirculation ballot.

Background

In paragraph 1894 of Federal Energy Regulatory Commission (FERC) Order 693 the Commission directed the Electric Reliability Organization to include the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms Used in Reliability Standards:

> "1894. The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to

include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

Inclusion of these definitions for Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms Used in Reliability Standards will address three outstanding Commission directives.

Additional information can be found on the project page.

Standards Development Process

The Standards 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 404-446-2560.

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Standards Announcement

Project 2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Ballot Pools Forming:	June 19 – July 18, 2012
Formal Comment Period Open:	June 19 – August 2, 2012

Upcoming Ballots
Initial Ballot: July 24 – August 2, 2012

Now Available

A formal comment period for **Phase 1 of the Glossary Updates for Statutory Definitions** is open through 8 p.m. Eastern on Thursday, August 2, 2012 and a ballot pool is forming through 8 a.m. Wednesday, July 18, 2012.

Instructions for Joining Ballot Pool(s)

A ballot pool is being formed. Registered Ballot Body members must join the ballot pool to be eligible to vote in balloting of Phase 1 of the Glossary Updates for Statutory Definitions. Registered Ballot Body members may join the ballot pool at the following page: Join ballot pool

During the pre-ballot window, members of the ballot pools may communicate with one another by using their "ballot pool list servers." (Once the balloting begins, ballot pool members are prohibited from using the ballot pool list servers.) The ballot pool list server for this ballot pool is: bp-2012-08.1_Phase_1_in@nerc.com

The ballot pool is open **through 8 a.m. Eastern on Wednesday, July 18, 2012.**

Instructions for Commenting

A formal comment period is open through 8 p.m. Eastern on Thursday, August 2, 2012. Please use this electronic form to submit comments. If you experience any difficulties in using the electronic form, please contact Monica Benson at monica.benson@nerc.net. An off-line, unofficial copy of the comment form is posted on the project page.

Commenters and voters must submit comments through the electronic comment form (link shown above). Due to modifications to NERC's balloting software, voters are asked to submit their ballot comments via the electronic comment form.

Next Steps

An initial ballot of Phase 1 of the Glossary Updates for Statutory Definitions will be conducted beginning on Tuesday, July 24, 2012 through 8 p.m. Eastern on Thursday, August 2, 2012.

Background

In paragraph 1894 of Federal Energy Regulatory Commission (FERC) Order 693 the Commission directed the Electric Reliability Organization to include the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms Used in Reliability Standards:

"1894. The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

The statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation are contained in the Electricity Modernization Act of 2005. Inclusion of the statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms Used in Reliability Standards will address three outstanding Commission directives.

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Standards Announcement

Project 2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Ballot Pools Forming:	June 19 – July 18, 2012
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Initial Ballot: July 24 – August 2, 2012

Now Available

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Instructions for Joining Ballot Pool(s)

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During the pre-ballot window, members of the ballot pools may communicate with one another by using their "ballot pool list servers." (Once the balloting begins, ballot pool members are prohibited from using the ballot pool list servers.) The ballot pool list server for this ballot pool is: bp-2012-08.1_Phase_1_in@nerc.com

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Next Steps

An initial ballot of Phase 1 of the Glossary Updates for Statutory Definitions will be conducted beginning on Tuesday, July 24, 2012 through 8 p.m. Eastern on Thursday, August 2, 2012.

Background

In paragraph 1894 of Federal Energy Regulatory Commission (FERC) Order 693 the Commission directed the Electric Reliability Organization to include the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms Used in Reliability Standards:

"1894. The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

The statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation are contained in the Electricity Modernization Act of 2005. Inclusion of the statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms Used in Reliability Standards will address three outstanding Commission directives.

Additional information can be found on the project page.

Standards Development Process

The Standards 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 404-446-2560.

North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Ballot Results	
Ballot Name:	Project 2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions_in
Ballot Period:	7/24/2012 - 8/2/2012
Ballot Type:	Initial
Total # Votes:	310
Total Ballot Pool:	373
Quorum:	**83.11 % The Quorum has been reached**
Weighted Segment Vote:	54.16 %
Ballot Results:	**The drafting team will consider all comments received.**

Summary of Ballot Results

Segment	Ballot Pool	Segment Weight	Affirmative # Votes	Affirmative Fraction	Negative # Votes	Negative Fraction	Abstain # Votes	No Vote
1 - Segment 1.	101	1	44	0.587	31	0.413	10	16
2 - Segment 2.	9	0.7	4	0.4	3	0.3	0	2
3 - Segment 3.	82	1	30	0.517	28	0.483	6	18
4 - Segment 4.	29	1	10	0.526	9	0.474	5	5
5 - Segment 5.	79	1	33	0.541	28	0.459	9	9
6 - Segment 6.	55	1	23	0.575	17	0.425	6	9
7 - Segment 7.	0	0	0	0	0	0	0	0
8 - Segment 8.	8	0.5	2	0.2	3	0.3	0	3
9 - Segment 9.	2	0.2	0	0	2	0.2	0	0
10 - Segment 10.	8	0.7	5	0.5	2	0.2	0	1
Totals	**373**	**7.1**	**151**	**3.846**	**123**	**3.254**	**36**	**63**

Individual Ballot Pool Results

Segment	Organization	Member	Ballot	Comments
1	Ameren Services	Kirit Shah	Affirmative	
1	American Electric Power	Paul B. Johnson	Affirmative	
1	American Transmission Company, LLC	Andrew Z Pusztai	Affirmative	
1	Arizona Public Service Co.	Robert Smith	Negative	
1	Associated Electric Cooperative, Inc.	John Bussman	Affirmative	
1	Austin Energy	James Armke	Negative	
1	Avista Corp.	Scott J Kinney	Abstain	

1	Balancing Authority of Northern California	Kevin Smith	Affirmative	
1	BC Hydro and Power Authority	Patricia Robertson	Affirmative	
1	Beaches Energy Services	Joseph S Stonecipher	Abstain	
1	Bonneville Power Administration	Donald S. Watkins	Affirmative	
1	Brazos Electric Power Cooperative, Inc.	Tony Kroskey	Negative	
1	Bryan Texas Utilities	John C Fontenot	Affirmative	
1	CenterPoint Energy Houston Electric, LLC	John Brockhan	Negative	
1	Central Maine Power Company	Joseph Turano Jr.	Negative	
1	City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	Chang G Choi	Negative	
1	Clark Public Utilities	Jack Stamper	Negative	
1	Cleco Power LLC	Danny McDaniel	Negative	
1	Colorado Springs Utilities	Paul Morland	Affirmative	
1	Consolidated Edison Co. of New York	Christopher L de Graffenried	Negative	
1	CPS Energy	Richard Castrejana	Affirmative	
1	Dairyland Power Coop.	Robert W. Roddy	Affirmative	
1	Dayton Power & Light Co.	Hertzel Shamash	Affirmative	
1	Dominion Virginia Power	Michael S Crowley		
1	Duke Energy Carolina	Douglas E. Hils	Affirmative	
1	El Paso Electric Company	Dennis Malone	Negative	
1	Empire District Electric Co.	Ralph F Meyer	Affirmative	
1	Entergy Services, Inc.	Edward J Davis		
1	FirstEnergy Corp.	William J Smith	Negative	
1	Florida Keys Electric Cooperative Assoc.	Dennis Minton	Affirmative	
1	Florida Power & Light Co.	Mike O'Neil	Affirmative	
1	Gainesville Regional Utilities	Richard Bachmeier	Affirmative	
1	Georgia Transmission Corporation	Jason Snodgrass	Negative	
1	Great River Energy	Gordon Pietsch		
1	Hoosier Energy Rural Electric Cooperative, Inc.	Bob Solomon	Affirmative	
1	Hydro One Networks, Inc.	Ajay Garg	Negative	
1	Hydro-Quebec TransEnergie	Bernard Pelletier	Negative	
1	Idaho Power Company	Molly Devine		
1	Imperial Irrigation District	Tino Zaragoza	Abstain	
1	International Transmission Company Holdings Corp	Michael Moltane	Abstain	
1	JEA	Ted Hobson	Negative	
1	KAMO Electric Cooperative	Walter Kenyon		
1	Kansas City Power & Light Co.	Michael Gammon	Negative	
1	Lakeland Electric	Larry E Watt	Affirmative	
1	Lee County Electric Cooperative	John W Delucca	Affirmative	
1	LG&E Energy Transmission Services	Bradley C. Young	Abstain	
1	Lincoln Electric System	Doug Bantam	Affirmative	
1	Long Island Power Authority	Robert Ganley		
1	Lower Colorado River Authority	Martyn Turner	Affirmative	
1	Manitoba Hydro	Joe D Petaski	Abstain	
1	MEAG Power	Danny Dees	Affirmative	
1	MidAmerican Energy Co.	Terry Harbour	Affirmative	
1	Muscatine Power & Water	Andrew J Kurriger		
1	National Grid USA	Michael Jones	Negative	
1	Nebraska Public Power District	Cole C Brodine	Abstain	
1	New York Power Authority	Bruce Metruck	Negative	
1	New York State Electric & Gas Corp.	Raymond P Kinney	Negative	
1	Northeast Utilities	David Boguslawski	Negative	
1	NorthWestern Energy	John Canavan		
1	NStar Gas and Electric	John Robertson	Negative	
1	Ohio Valley Electric Corp.	Robert Mattey	Affirmative	
1	Oklahoma Gas and Electric Co.	Marvin E VanBebber	Abstain	
1	Omaha Public Power District	Doug Peterchuck		
1	Oncor Electric Delivery	Jen Fiegel	Affirmative	
1	Orlando Utilities Commission	Brad Chase		
1	Pacific Gas and Electric Company	Bangalore Vijayraghavan		
1	PacifiCorp	Ryan Millard	Affirmative	
1	PECO Energy	Ronald Schloendorn		
1	Platte River Power Authority	John C. Collins	Affirmative	
1	Portland General Electric Co.	John T Walker	Affirmative	
1	Potomac Electric Power Co.	David Thorne	Affirmative	
1	PowerSouth Energy Cooperative	Larry D Avery	Affirmative	

1	PPL Electric Utilities Corp.	Brenda L Truhe		
1	Progress Energy Carolinas	Brett A. Koelsch	Affirmative	
1	Public Service Company of New Mexico	Laurie Williams	Negative	
1	Public Service Electric and Gas Co.	Kenneth D. Brown	Affirmative	
1	Public Utility District No. 1 of Okanogan County	Dale Dunckel	Negative	
1	Public Utility District No. 2 of Grant County, Washington	Rod Noteboom	Negative	
1	Puget Sound Energy, Inc.	Denise M Lietz	Affirmative	
1	Rochester Gas and Electric Corp.	John C. Allen	Negative	
1	Sacramento Municipal Utility District	Tim Kelley	Affirmative	
1	Salt River Project	Robert Kondziolka	Affirmative	
1	Santee Cooper	Terry L Blackwell	Negative	
1	Seattle City Light	Pawel Krupa	Abstain	
1	Sierra Pacific Power Co.	Rich Salgo	Abstain	
1	Snohomish County PUD No. 1	Long T Duong	Affirmative	
1	South California Edison Company	Steven Mavis	Affirmative	
1	Southern Company Services, Inc.	Robert A. Schaffeld	Negative	
1	Southern Illinois Power Coop.	William Hutchison		
1	Southwest Transmission Cooperative, Inc.	John Shaver	Affirmative	
1	Sunflower Electric Power Corporation	Noman Lee Williams	Affirmative	
1	Tennessee Valley Authority	Howell D Scott	Affirmative	
1	Trans Bay Cable LLC	Steven Powell	Negative	
1	Tri-State G & T Association, Inc.	Tracy Sliman	Affirmative	
1	Tucson Electric Power Co.	John Tolo	Affirmative	
1	Turlock Irrigation District	Esteban Martinez	Negative	
1	United Illuminating Co.	Jonathan Appelbaum	Negative	
1	Westar Energy	Allen Klassen	Negative	
1	Western Area Power Administration	Brandy A Dunn	Affirmative	
1	Western Farmers Electric Coop.	Forrest Brock		
1	Xcel Energy, Inc.	Gregory L Pieper		
2	BC Hydro	Venkataramakrishnan Vinnakota	Affirmative	
2	Electric Reliability Council of Texas, Inc.	Cheryl Moseley	Affirmative	
2	Independent Electricity System Operator	Barbara Constantinescu	Affirmative	
2	ISO New England, Inc.	Kathleen Goodman	Negative	
2	Midwest ISO, Inc.	Marie Knox		
2	New Brunswick System Operator	Alden Briggs	Negative	
2	New York Independent System Operator	Gregory Campoli		
2	PJM Interconnection, L.L.C.	stephanie monzon	Affirmative	
2	Southwest Power Pool, Inc.	Charles H. Yeung	Negative	
3	AEP	Michael E Deloach	Affirmative	
3	Alabama Power Company	Richard J. Mandes	Negative	
3	Ameren Services	Mark Peters	Affirmative	
3	APS	Steven Norris	Negative	
3	Atlantic City Electric Company	NICOLE BUCKMAN		
3	Avista Corp.	Robert Lafferty		
3	BC Hydro and Power Authority	Pat G. Harrington	Affirmative	
3	Bonneville Power Administration	Rebecca Berdahl	Affirmative	
3	Central Electric Power Cooperative	Adam M Weber		
3	Central Lincoln PUD	Steve Alexanderson		
3	City of Austin dba Austin Energy	Andrew Gallo	Negative	
3	City of Bartow, Florida	Matt Culverhouse		
3	City of Farmington	Linda R Jacobson	Negative	
3	City of Green Cove Springs	Gregg R Griffin	Abstain	
3	City of Redding	Bill Hughes	Affirmative	
3	Cleco Corporation	Michelle A Corley	Negative	
3	Colorado Springs Utilities	Charles Morgan	Affirmative	
3	ComEd	Bruce Krawczyk	Negative	
3	Consolidated Edison Co. of New York	Peter T Yost	Negative	
3	Consumers Energy	Richard Blumenstock	Negative	
3	CPS Energy	Jose Escamilla	Affirmative	
3	Delmarva Power & Light Co.	Michael R. Mayer	Affirmative	
3	Detroit Edison Company	Kent Kujala	Negative	
3	Dominion Resources, Inc.	Connie B Lowe	Negative	
3	Duke Energy Carolina	Henry Ernst-Jr		
3	El Paso Electric Company	Tracy Van Slyke	Negative	
3	Entergy	Joel T Plessinger		

3	FirstEnergy Energy Delivery	Stephan Kern	Negative	
3	Flathead Electric Cooperative	John M Goroski		
3	Florida Municipal Power Agency	Joe McKinney	Negative	
3	Florida Power Corporation	Lee Schuster	Affirmative	
3	Georgia Power Company	Danny Lindsey	Negative	
3	Georgia System Operations Corporation	Scott McGough	Negative	
3	Great River Energy	Brian Glover	Affirmative	
3	Gulf Power Company	Paul C Caldwell	Negative	
3	Hydro One Networks, Inc.	David Kiguel	Negative	
3	Imperial Irrigation District	Jesus S. Alcaraz		
3	JEA	Garry Baker		
3	Kansas City Power & Light Co.	Charles Locke	Negative	
3	Kissimmee Utility Authority	Gregory D Woessner		
3	Lakeland Electric	Mace D Hunter	Affirmative	
3	Lincoln Electric System	Jason Fortik		
3	Los Angeles Department of Water & Power	Daniel D Kurowski		
3	Louisville Gas and Electric Co.	Charles A. Freibert	Negative	
3	Manitoba Hydro	Greg C. Parent	Abstain	
3	MidAmerican Energy Co.	Thomas C. Mielnik	Affirmative	
3	Mississippi Power	Jeff Franklin	Negative	
3	Modesto Irrigation District	Jack W Savage	Affirmative	
3	Municipal Electric Authority of Georgia	Steven M. Jackson	Affirmative	
3	Muscatine Power & Water	John S Bos	Affirmative	
3	Nebraska Public Power District	Tony Eddleman	Abstain	
3	New York Power Authority	David R Rivera	Negative	
3	Niagara Mohawk (National Grid Company)	Michael Schiavone	Negative	
3	Northern Indiana Public Service Co.	William SeDoris	Affirmative	
3	Oklahoma Gas and Electric Co.	Gary Clear		
3	Omaha Public Power District	Blaine R. Dinwiddie		
3	Orange and Rockland Utilities, Inc.	David Burke	Negative	
3	Orlando Utilities Commission	Ballard K Mutters	Abstain	
3	Owensboro Municipal Utilities	Thomas T Lyons	Abstain	
3	Pacific Gas and Electric Company	John H Hagen	Affirmative	
3	PacifiCorp	Dan Zollner		
3	Pepco Holdings, Inc.	Mark R Jones	Affirmative	
3	Platte River Power Authority	Terry L Baker	Affirmative	
3	PNM Resources	Michael Mertz	Negative	
3	Progress Energy Carolinas	Sam Waters	Affirmative	
3	Public Service Electric and Gas Co.	Jeffrey Mueller	Affirmative	
3	Puget Sound Energy, Inc.	Erin Apperson	Affirmative	
3	Rutherford EMC	Thomas M Haire	Affirmative	
3	Sacramento Municipal Utility District	James Leigh-Kendall	Affirmative	
3	Salt River Project	John T. Underhill	Affirmative	
3	Santee Cooper	James M Poston	Negative	
3	Seattle City Light	Dana Wheelock	Abstain	
3	Seminole Electric Cooperative, Inc.	James R Frauen	Negative	
3	Snohomish County PUD No. 1	Mark Oens	Affirmative	
3	South Carolina Electric & Gas Co.	Hubert C Young	Negative	
3	Tacoma Public Utilities	Travis Metcalfe	Negative	
3	Tampa Electric Co.	Ronald L. Donahey		
3	Tennessee Valley Authority	Ian S Grant	Affirmative	
3	Tri-County Electric Cooperative, Inc.	Mike Swearingen	Affirmative	
3	Tri-State G & T Association, Inc.	Janelle Marriott	Affirmative	
3	Westar Energy	Bo Jones		
3	Xcel Energy, Inc.	Michael Ibold	Affirmative	
4	American Municipal Power	Kevin Koloini	Abstain	
4	Blue Ridge Power Agency	Duane S Dahlquist	Affirmative	
4	City of Austin dba Austin Energy	Reza Ebrahimian	Negative	
4	City of New Smyrna Beach Utilities Commission	Tim Beyrle		
4	City of Redding	Nicholas Zettel	Affirmative	
4	City Utilities of Springfield, Missouri	John Allen	Affirmative	
4	Consumers Energy	David Frank Ronk	Negative	
4	Detroit Edison Company	Daniel Herring		
4	Flathead Electric Cooperative	Russ Schneider	Affirmative	
4	Florida Municipal Power Agency	Frank Gaffney	Negative	
4	Fort Pierce Utilities Authority	Cairo Vanegas	Negative	

4	Georgia System Operations Corporation	Guy Andrews	Negative	
4	Illinois Municipal Electric Agency	Bob C. Thomas	Abstain	
4	LaGen	Richard Comeaux	Abstain	
4	Madison Gas and Electric Co.	Joseph DePoorter	Affirmative	
4	Modesto Irrigation District	Spencer Tacke	Affirmative	
4	North Carolina Eastern Municipal Power Agency	Cecil Rhodes	Affirmative	
4	Ohio Edison Company	Douglas Hohlbaugh	Negative	
4	Oklahoma Municipal Power Authority	Ashley Stringer	Abstain	
4	Old Dominion Electric Coop.	Mark Ringhausen	Affirmative	
4	Public Utility District No. 1 of Douglas County	Henry E. LuBean		
4	Public Utility District No. 1 of Snohomish County	John D Martinsen	Affirmative	
4	Sacramento Municipal Utility District	Mike Ramirez	Affirmative	
4	Seattle City Light	Hao Li	Abstain	
4	Seminole Electric Cooperative, Inc.	Steven R Wallace		
4	Tacoma Public Utilities	Keith Morisette	Negative	
4	Turlock Irrigation District	Steven C Hill	Negative	
4	Wisconsin Energy Corp.	Anthony Jankowski	Negative	
4	WPPI Energy	Todd Komplin		
5	AEP Service Corp.	Brock Ondayko	Affirmative	
5	Amerenue	Sam Dwyer	Affirmative	
5	Arizona Public Service Co.	Edward Cambridge	Negative	
5	Avista Corp.	Edward F. Groce	Abstain	
5	BC Hydro and Power Authority	Clement Ma	Affirmative	
5	Boise-Kuna Irrigation District/dba Lucky peak power plant project	Mike D Kukla		
5	Bonneville Power Administration	Francis J. Halpin	Affirmative	
5	Brazos Electric Power Cooperative, Inc.	Shari Heino	Negative	
5	Caithness Long Island, LLC	Jason M Moore	Abstain	
5	City and County of San Francisco	Daniel Mason	Negative	
5	City of Austin dba Austin Energy	Jeanie Doty	Negative	
5	City of Redding	Paul A. Cummings	Affirmative	
5	City of Tallahassee	Karen Webb	Abstain	
5	Cleco Power	Stephanie Huffman	Negative	
5	Cogentrix Energy, Inc.	Mike D Hirst	Affirmative	
5	Colorado Springs Utilities	Jennifer Eckels	Affirmative	
5	Consolidated Edison Co. of New York	Wilket (Jack) Ng	Negative	
5	Consumers Energy Company	David C Greyerbiehl	Negative	
5	Detroit Edison Company	Christy Wicke	Negative	
5	Dominion Resources, Inc.	Mike Garton	Negative	
5	Duke Energy	Dale Q Goodwine	Affirmative	
5	Edison Mission Marketing & Trading Inc.	Brenda J Frazer	Affirmative	
5	El Paso Electric Company	David Hawkins	Negative	
5	Electric Power Supply Association	John R Cashin		
5	Energy Services, Inc.	Tracey Stubbs		
5	Essential Power, LLC	Patrick Brown	Affirmative	
5	Exelon Nuclear	Michael Korchynsky	Negative	
5	FirstEnergy Solutions	Kenneth Dresner	Negative	
5	Florida Municipal Power Agency	David Schumann	Negative	
5	Hydro-Québec Production	Roger Dufresne	Negative	
5	JEA	John J Babik		
5	Kansas City Power & Light Co.	Brett Holland	Negative	
5	Kissimmee Utility Authority	Mike Blough	Negative	
5	Lakeland Electric	James M Howard	Negative	
5	Liberty Electric Power LLC	Daniel Duff	Affirmative	
5	Lincoln Electric System	Dennis Florom	Affirmative	
5	Los Angeles Department of Water & Power	Kenneth Silver		
5	Lower Colorado River Authority	Tom Foreman	Affirmative	
5	Luminant Generation Company LLC	Mike Laney	Negative	
5	Manitoba Hydro	S N Fernando	Abstain	
5	Massachusetts Municipal Wholesale Electric Company	David Gordon	Abstain	
5	MEAG Power	Steven Grego	Affirmative	
5	MidAmerican Energy Co.	Christopher Schneider	Affirmative	
5	Muscatine Power & Water	Mike Avesing	Affirmative	
5	Nebraska Public Power District	Don Schmit	Abstain	
5	New York Power Authority	Wayne Sipperly	Negative	

5	NextEra Energy	Allen D Schriver	Negative	
5	North Carolina Electric Membership Corp.	Jeffrey S Brame	Affirmative	
5	Occidental Chemical	Michelle R DAntuono	Negative	
5	Omaha Public Power District	Mahmood Z. Safi	Affirmative	
5	Pacific Gas and Electric Company	Richard J. Padilla		
5	PacifiCorp	Sandra L. Shaffer	Affirmative	
5	Platte River Power Authority	Roland Thiel	Affirmative	
5	Portland General Electric Co.	matt E jastram		
5	PPL Generation LLC	Annette M Bannon	Negative	
5	Progress Energy Carolinas	Wayne Lewis	Affirmative	
5	Proven Compliance Solutions	Mitchell E Needham	Abstain	
5	PSEG Fossil LLC	Tim Kucey	Affirmative	
5	Public Utility District No. 1 of Lewis County	Steven Grega	Abstain	
5	Public Utility District No. 2 of Grant County, Washington	Michiko Sell	Negative	
5	Puget Sound Energy, Inc.	Tom Flynn	Affirmative	
5	Sacramento Municipal Utility District	Bethany Hunter	Affirmative	
5	Salt River Project	William Alkema	Affirmative	
5	Santee Cooper	Lewis P Pierce	Negative	
5	Seminole Electric Cooperative, Inc.	Brenda K. Atkins	Negative	
5	Snohomish County PUD No. 1	Sam Nietfeld	Affirmative	
5	Southeastern Power Administration	Douglas Spencer	Affirmative	
5	Southern California Edison Company	Denise Yaffe	Affirmative	
5	Southern Company Generation	William D Shultz	Negative	
5	Tacoma Power	Chris Mattson	Negative	
5	Tampa Electric Co.	RJames Rocha	Affirmative	
5	Tennessee Valley Authority	David Thompson	Affirmative	
5	TransAlta Corporation	Rebbekka McFadden		
5	Tri-State G & T Association, Inc.	Mark Stein	Affirmative	
5	U.S. Army Corps of Engineers	Melissa Kurtz	Affirmative	
5	U.S. Bureau of Reclamation	Martin Bauer	Abstain	
5	Westar Energy	Bryan Taggart	Negative	
5	WPPI Energy	Steven Leovy	Affirmative	
5	Xcel Energy, Inc.	Liam Noailles		
6	AEP Marketing	Edward P. Cox	Affirmative	
6	Ameren Energy Marketing Co.	Jennifer Richardson	Affirmative	
6	APS	Randy A. Young	Negative	
6	Bonneville Power Administration	Brenda S. Anderson	Affirmative	
6	City of Austin dba Austin Energy	Lisa L Martin	Negative	
6	City of Redding	Marvin Briggs	Affirmative	
6	Cleco Power LLC	Robert Hirchak	Negative	
6	Colorado Springs Utilities	Lisa C Rosintoski	Affirmative	
6	Consolidated Edison Co. of New York	Nickesha P Carrol	Negative	
6	Constellation Energy Commodities Group	Donald Schopp	Negative	
6	Dominion Resources, Inc.	Louis S. Slade	Negative	
6	Duke Energy	Greg Cecil		
6	El Paso Electric Company	Tony Soto		
6	Entergy Services, Inc.	Terri F Benoit		
6	FirstEnergy Solutions	Kevin Querry	Negative	
6	Florida Municipal Power Agency	Richard L. Montgomery	Negative	
6	Florida Municipal Power Pool	Thomas Washburn	Abstain	
6	Florida Power & Light Co.	Silvia P. Mitchell	Affirmative	
6	Great River Energy	Donna Stephenson	Affirmative	
6	Imperial Irrigation District	Cathy Bretz		
6	Kansas City Power & Light Co.	Jessica L Klinghoffer	Negative	
6	Lakeland Electric	Paul Shipps	Affirmative	
6	Lincoln Electric System	Eric Ruskamp	Affirmative	
6	Los Angeles Department of Water & Power	Brad Packer		
6	Luminant Energy	Brad Jones	Negative	
6	Manitoba Hydro	Daniel Prowse	Abstain	
6	MidAmerican Energy Co.	Dennis Kimm		
6	Modesto Irrigation District	James McFall	Affirmative	
6	Muscatine Power & Water	John Stolley	Affirmative	
6	New York Power Authority	Saul Rojas	Negative	
6	North Carolina Municipal Power Agency #1	Matthew Schull	Abstain	
6	Northern Indiana Public Service Co.	Joseph O'Brien	Affirmative	
6	NRG Energy, Inc.	Alan Johnson	Abstain	

6	Omaha Public Power District	David Ried	Affirmative	
6	PacifiCorp	Scott L Smith	Affirmative	
6	Platte River Power Authority	Carol Ballantine	Affirmative	
6	Portland General Electric Co.	John Jamieson		
6	PPL EnergyPlus LLC	Elizabeth Davis	Negative	
6	Progress Energy	John T Sturgeon	Affirmative	
6	PSEG Energy Resources & Trade LLC	Peter Dolan	Negative	
6	Public Utility District No. 1 of Chelan County	Hugh A. Owen	Abstain	
6	Sacramento Municipal Utility District	Diane Enderby	Affirmative	
6	Salt River Project	Steven J Hulet	Affirmative	
6	Santee Cooper	Michael Brown	Negative	
6	Seattle City Light	Dennis Sismaet	Abstain	
6	Seminole Electric Cooperative, Inc.	Trudy S. Novak	Negative	
6	Snohomish County PUD No. 1	William T Moojen	Affirmative	
6	South California Edison Company	Lujuanna Medina	Affirmative	
6	Southern Company Generation and Energy Marketing	John J. Ciza	Negative	
6	Tacoma Public Utilities	Michael C Hill		
6	Tampa Electric Co.	Benjamin F Smith II		
6	Tennessee Valley Authority	Marjorie S. Parsons	Affirmative	
6	Westar Energy	Grant L Wilkerson	Negative	
6	Western Area Power Administration - UGP Marketing	Peter H Kinney	Affirmative	
6	Xcel Energy, Inc.	David F Lemmons	Affirmative	
8		Edward C Stein		
8		James A Maenner		
8		Roger C Zaklukiewicz	Negative	
8	JDRJC Associates	Jim Cyrulewski	Negative	
8	Massachusetts Attorney General	Frederick R Plett	Negative	
8	Utility Services, Inc.	Brian Evans-Mongeon		
8	Utility System Effeciencies, Inc. (USE)	Robert L Dintelman	Affirmative	
8	Volkmann Consulting, Inc.	Terry Volkmann	Affirmative	
9	Commonwealth of Massachusetts Department of Public Utilities	Donald Nelson	Negative	
9	National Association of Regulatory Utility Commissioners	Diane J. Barney	Negative	
10	Midwest Reliability Organization	William S Smith	Affirmative	
10	New York State Reliability Council	Alan Adamson	Affirmative	
10	Northeast Power Coordinating Council	Guy V. Zito	Negative	
10	ReliabilityFirst Corporation	Anthony E Jablonski	Affirmative	
10	SERC Reliability Corporation	Carter B Edge		
10	Southwest Power Pool RE	Emily Pennel	Affirmative	
10	Texas Reliability Entity, Inc.	Donald G Jones	Negative	
10	Western Electricity Coordinating Council	Steven L. Rueckert	Affirmative	

Name (44 Responses)
Organization (44 Responses)
Group Name (16 Responses)
Lead Contact (16 Responses)
Question 1 (59 Responses)
Question 1 Comments (60 Responses)

Group
Hydro One
Sasa Maljukan
Yes
There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what constitutes Bulk Power System. Use of the term “supply” could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes.
Individual
Scott Bos
Muscatine Power and Water
Yes
Bulk Power System: MPW believes that to reduce any confusion that it is NERC’s intent to not capatilize the word “facilities.” Recommend to read, “Bulk Power System means, facilities …” (lower case f) "Bulk Power System" is defined by Section 215(a) (1) of the Federal Power Act as “facilities...." This is lower case "f" in the Federal Power Act. The NERC definition should be consistent with the lower case "f" used in Section 215(a) of the Federal Power Act. MPW understands that the Commission has directed NERC to include the term “Bulk Power System” in the NERC glossary and this seems to give NERC very little choice but to address FERC’s request. However, MPW wishes to make it exceedingly clear that it is inappropriate to use the highly unbounded term “Bulk Power System” in a NERC Reliability Standard as compliance cannot be quantified when using an unbounded term. Therefore, a NERC Standards Drafting Team should not use the unbounded term “Bulk Power System” in a new or revised NERC Standard until “Bulk Power System” is clearly defined, similar to the “bright-line” Bulk Electric System. If “Bulk Power System” should not be used in a NERC Reliability Standard, then the FERC decision to direct NERC to include “Bulk Power System” in the NERC glossary is not without defect and the FERC directive should be rescinded. Reliability Standard: NERC has capatilized the word Facility in this definition. NERC’s glossary defines “Facility” as: A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.). With “Facility” capatilized along with Bulk Power System, the industry will equate Bulk Power System directly to Bulk Electric System, 100kV and above. MPW recommends that “Facility” not be capatilized unless it is NERC’s intent to have BES and BPS to mean the same. Reliable Operation: No comments, thank you.
Individual
Scott McGough
Georgia System Operations
Yes
The FERC Directive rests on a misunderstanding of the NERC standards development process. Terms are added to the glossary as they are introduced in the development or revision of a standard; they are not added speculatively in anticipation that they will be used later, or retroactively to modify the meaning of a standard. The FERC directive to add these definitions should be taken as a directive to revise the affected standards using the statutory definitions and at that point add them to the glossary. Using this approach will provide industry the opportunity to focus on how utilizing these definitions might change the meaning of the affected standards. Through the standards development process it might be concluded that the statutory definition can be applied with no adverse consequences, resulting in a trivial revision of the standard (i.e. the addition of the term to the

glossary and the capitalizing of the term in the standards). However it is also possible that the SDT and industry will conclude that additional changes to the standard are required to reflect the intended meaning of affected requirements in light of the new definition. Using the standards development process such changes could be made. If this SAR is approved there will be no such flexibility. The new definitions will be added as written with no opportunity for modification to the definitions or to standards that use these terms in the lower case. This would result in confusion about whether these definitions apply to non-capitalized terms that pre-date the definition. It could also lead to unintended consequences of applying a new definition to an existing requirement without a thorough vetting of the impact of the changes.
Individual
Howard Rulf
Wisconsin Electric dba We Energies
Yes
The phrase “depending on the context” in the Bulk Power System definition makes the definition subjective. Who decides, when “Bulk Power System” is used, if the NERC Glossary definition applies or not since it depends on the context? In FERC’s BES Definition NOPR (docket RM12-6) it is apparent that both FERC and NERC are concerned with inconsistency, subjectivity, and discretion in the application of NERC Glossary definitions. See paragraphs 17, 19, 37, 56, and 72 of that NOPR. The phrase “depending on the context” needs to be removed from the Bulk Power System definition.
Group
Northeast Power Corodinating Council
Guy Zito
Yes
There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what constitutes Bulk Power System. Use of the term “supply” could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes. The word “necessary” is also used in the definition. The use of the term ''necessary'' can be left to interpretation. What “Facilities and control systems…” are necessary? For example, a 345kV Phase Angle Regulator might be useful for maintaining transactions, but because of the system configuration does not increase system reliability pre and post contingency. What is meant by “depending on the context”? This implies that there are multiple definitions of “Bulk Power System”. What are they?
Individual
Darryl Curtis
Oncor Electric Delivery Company LLC
No
Group
Western Small Entity Comment Group
Steve Alexanderson P.E.
Yes
A)The definition of Bulk Power System varies from the FPA definition by the inclusion of the words “depending on the context.” 1) We are unsure that either NERC or FERC have the authority to overrule the definition established by Congress. 2) It is unclear what the added words are intended to achieve, and just how far “the context” may allow the the definition to deviate from the listed items. B) The definition of Reliability Standard varies from the FPA definition by the inclusion of the words “without limiting the foregoing.” 1) We are again concerned regarding the authority of NERC and FERC to change what has been established by Congress. 2) The added words only add confusion. Once inside the NERC glossary, the “foregoing” will consist of all the definitions preceding it in the alphabet, and none of those following. We don’t believe a definition should rely on its place in the alphabet.
Individual

Wayne Sipperly
New York Power Authority
NYPA supports the comments submitted by the NPCC Regional Standards Committee (RSC).
Individual
Donald E Nelson
Ma Department of Public Utilities
Yes
1) NERC, as an ERO, is a continent wide reliablity organization and adopting terms that have FPA 215 origins is particularly problematic for Canadian members. 2) The term "Reliable Operation" has been changed slightly from the statutory definition provided in the FPA 215 to include the word "supply" to the transmission system which could have far reaching implications and create serious jurisdictional issues (i.e. distribution, cranking paths, etc.). This is contrary to project which was to add the specific definition to the glossary not create a "new" inconsistent one. 3) There was general concern over the "quality" of the definitions and many believe they are problematic and create scope issues with the standards and unrealistic reliability objectives.
Individual
Anthony Jablonski
ReliabilityFirst
Yes
ReliabilityFirst votes in the Affirmative for the three proposed definitions to be added to the NERC Glossary of Terms. ReliabilityFirst agrees that the definitions (approved by the Commission) in the NERC RoP should be consistent with the defined terms in the NERC Glossary of Terms. While ReliabilityFirst votes in the Affirmative, we offer the following comment for consideration: 1. The three proposed definitions appear in a number of NERC/FERC approved Standards, though they are not capitalized. Assuming these three definitions are approved and added to the NERC Glossary of Terms, will there be a holistic capitalization of these terms through the suite of NERC/FERC approved standards?
Group
Arizona Public Service Company
Janet Smith
Yes
AZPS agrees with the definitions for Bulk Power System and Reliability Standard. However, AZPS does not agree with the the definition of Reliable Operation because this includes a Cyber Security Incident. The scope of the Cyber Security Incident can be unlimited and can take multiple facilities out in a single incident. A cyber incident is beyond a normal operation or state and has further reaching impacts than operating limits, cascading failures, etc. It will be almost impossible or at best difficult to classify any operating condition as “Reliable Operation” under this scenario.
Individual
Pablo Oñate
El Paso Electric
Yes
EPE votes no on the current proposal for two reasons: First, the proposed definitions do not mirror the statutory language in Section 215 of the Federal Power Act. The deviation EPE finds particularly objectionable is the proposed use of the words “electric energy supply and transmission network” in the definition of “bulk power system” when the statute uses the words “electric energy transmission network.” The addition of the words “supply and” in the proposed definition could be read to stretch the scope of the facilities subject to FERC’s reliability jurisdiction beyond what Congress intended (and specifically defined) in the statute. Second, there is a need for NERC to address whether the term “bulk power system” is intended to replace the currently-effective term, “bulk electric system.” EPE’s understanding from discussions in the standards development process is that the “bulk electric system” definition will continue in effect, and be used as a type of subset under the definition of “bulk power system.” It is important for voting entities to be informed of the context in which the definition is proposed for effectiveness. We urge NERC to address how the proposed definition of “bulk power

system” is intended to be implemented in measuring compliance with the various reliability standards: Specifically: 1) Will the definition of “bulk power system” be used in addition to – or in place of – the definition of “bulk electric system”? 2) If both terms are to be used, will each reliability standard be modified to identify whether it applies to the “bulk power system” or the “bulk electric system”? 3) Will the currently-effective threshold of 100 kV remain in effect, such that all such facilities within the definition of “bulk electric system” will be assumed by NERC and the regional entities to be subsumed within the definition of “bulk power system”? 4) Does NERC envision conducting or directing an assessment of each TO/TP’s transmission assets to delineate which lines (regardless of voltage) fall within the “bulk power system” definition of “necessary for operating an interconnected electric energy transmission network”? EPE urges continuation of the 100 kV threshold. 5) Will NERC exclude from the parameters of “bulk power system” radial transmission lines in the same manner as those lines are excluded from the definition of “bulk electric system” today? EPE would like for any proposed definition to speak directly to the exclusion of radial lines.
Individual
Fred Plett
Massachusetts Attorney General
Yes
The definition of Reliable Operation is too black and white where it says "will not occur as a result of a sudden disturbance, including a Cyber Security Incident, or unanticipated failure of system Elements". There are limits to redundancy in design, such as n-x where x >= 2, conditions, where such events could occur and the system should not be designed to prevent against such events because the probability is too low and the cost is too high.
Individual
Kelsi Oswald
Pinellas County
Yes
The wording of the definition of Bulk Power System says "electric energy from generating facilities". I think the intent is to include the generating facilities as part of the Bulk Power System, not just the energy they generate. This language should be reviewed.
Group
MRO NSRF
WILL SMITH
Yes
Bulk Power System: The NSRF believes that to reduce any confusion that it is NERC’s intent to not capatilize the word “facilities.” Recommend to read, “Bulk Power System means, facilities …” The NSRF understands that the Commission has directed NERC to include the term “Bulk Power System” in the NERC glossary and this seems to leave NERC very little choice but to address FERC’s request. However, NSRF wishes to make it quite clear that it is inappropriate to use the highly unbounded term “Bulk Power System” in a NERC Reliability Standard as compliance cannot be quantified when using an unbounded term. Therefore, a NERC Standards Drafting Team should not use the unbounded term “Bulk Power System” in a new or revised NERC Standard until “Bulk Power System” is clearly defined, similar to the “bright-line” Bulk Electric System. If “Bulk Power System” should not be used in a NERC Reliability Standard, then the FERC decision to direct NERC to include “Bulk Power System” in the NERC glossary is not without defect and the FERC directive should be rescinded. Reliability Standard: NERC has capatilized the word Facility in this definition. NERC’s glossary defines “Facility” as: A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.). With “Facility” capatilized along with Bulk Power System, the industry will equate Bulk Power System directly to Bulk Electric System, 100kV and above. Recommend that “Facility” not be capatilized unless it is NERC’s intent to have BES and BPS to mean the same. Reliable Operation: No comments, thank you.
Individual
PHAN, Si Truc
Hydro-Quebec TransÉnergie
Yes

There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what constitutes Bulk Power System. Use of the term “supply” could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. Also the use of the term ''necessary'' can be leave to different interpretations. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes.
Individual
Andrew Gallo
City of Austin dba Austin Energy
Yes
Austin Energy believes the definitions in the Rules of Procedure ought to exactly match the definitions in the statute. For example, "Facilities" in the definition of "Bulk Power System" should not be capitalized in the RoP because it is not capitalized in the statute. Additionally, you have included an "(i)" in the definition, but omitted "(ii)" and, therefore, people will not know where the distinction is supposed to be for “depending on the context.” Additionally, adding "depending on the context" creates ambiguity because context is subjective. Finally, adding the word "supply" has the potential to change the definition. Consequently (and to avoid confusion), Austin Energy recommends using the terms exactly as defined in the statute.
Group
Luminant
Brenda Hampton
Yes
These statutory definitions should match exactly the definitions of those terms in section 215.
Individual
Chris de Graffenried
Consolidated Edison Co. of NY, Inc.
Yes
Con Edison supports NPCC's comments.
Group
Detroit Edison
Kent Kujala
Yes
Bulk Power System- add to the last sentence- The term does not include facilities used in the local distribution of electric energy "or radial lines connecting generation facilities to the Transmission system". Reliability Standard- change the wording of the beginning of the first sentense to read- a document containing one or more requirements to provide for the Reliable Operation of the Bulk Power System. REMOVE the following- including without limiting the foregoing, requirements for the operation of existing Bulk Power System Facilities, including cyber security protection, and including the design of planned additions or modifications to such Facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge Bulk Power System Facilities or to construct new transmission capacity or generation capacity. Leave the last sentence about FERC approval. Bulk Power System - remove "depending on the context:" This implies multiple definitions and there is only one provided. Reliability Standard - change first sentence "means a requirement to provide for..." to "means a requirement or set of requirements to provide for..."
Individual
Thad Ness
American Electric Power
Yes
AEP reccomends that whatever changes are accepted in regards to the proposed definitions are also carried over to the ROP and that an effort is made that they be kept in sync with one another. With regard to the definition of “Bulk Power System”, we recommend changing the text from “(ii) and

electric energy from generating facilities needed" to "(ii) and generating facilities producing the electric energy needed…" With regard to the definition of "Reliability Standard", recommend using another word in place of the lower case "requirement" to avoid confusing it with the defined term "Requirement". In addition, NERC may want to consider including planning and maintenance as part of this definition, going beyond operations only.
Individual
Jack Stamper
Clark Public Utilities
Yes
The definition of Reliability Standard is too long and confusing. I cannot keep up with what the definition is attempting to state in the first long sentence. Why does the definition of Reliability Standard need these references to existing BPS facilities, cyber facilities, and planned facilities? The discussion of existing and planned BPS facilities does not add anything to this definition. Cyber equipment is already included in the definition of Bulk Power System (i.e. control systems) so the mention of cyber is not needed. I suggest the definition be shortened to the following: "Reliability Standard" means a document that provides the minimum requirements necessary to provide for the Reliable Operation of the Bulk Power System. A Reliability Standard shall not be effective in the United States until approved by the Federal Energy Regulatory Commission and shall not be effective in other jurisdictions until made or allowed to become effective by the Applicable Governmental Authority.
Individual
D Mason
HHWP
Yes
The need for a different definitions of BPS and BES remains perplexing. If there is a real difference between these systems, then that should be refereced in the definition. Until the difference between the BPS and BES is clear, no BPS definition, stautory or otherwise is truely meaningful.
Individual
Michelle R D'Antuono
Ingleside Cogeneration LP (affiliate of Occidental Chemical Corporation)
Yes
OEVC would like to see NERC commit to aligning the statutory definitions with those traditionally used in the base of Reliability Standards. The industry has expended a significant amount of effort developing an updated defintion of the Bulk Electric System and an Adequate Level of Reliability – which correspond to Bulk Power System and Reliable Operation respectively. If the terms mean different things depending on the circumstances, then those differences must be addressed. Unfortunately both NERC and FERC have invoked the reliability of the "BPS" in taking actions which are outside of the scope of the in-effect Reliability Standards. Such actions can be perceived as cynical by industry stakeholders and do not instill a sense of shared direction with the regulatory bodies. Similarly, the task force developing the definition of "Adequate Level of Reliability" has not addressed how it is linked to the statutory definition of "Reliable Operation". In OEVC's view, this can actually be an opportunity to weigh the true spirit of partnership by discussing how both governmental authorities and the industry can communicate realistic expectations of BES or BPS reliability to the public. Although it is perfectly valid to expect the industry to invest time and effort into continual reliability improvements, a united understanding on the state of electric system availability would go far to repair fences on all sides. The conversation should rely on the target performance metrics that NERC has been developing for years – a scientific foundation which should remove any ambiguity from the equation.
Individual
Kathleen Goodman
ISO New England
Yes
There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what

constitutes Bulk Power System. Use of the term “supply” could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes. The word “necessary” is also used in the definition. The use of the term ''necessary'' can be left to interpretation. What “Facilities and control systems…” are necessary? For example, a 345kV Phase Angle Regulator might be useful for maintaining transactions, but because of the system configuration does not increase system reliability pre and post contingency. What is meant by “depending on the context”? This implies that there are multiple definitions of “Bulk Power System”. Why?
Individual
Dave Willis
Idaho Power Co.
Yes
There should be more of an effort to unify the definitions of Bulk Power System and Bulk Electric System. Having both defined terms used in Reliability Standards add to the confusion and incorrect interpretation of the applicability of the standards.
Individual
Don Jones
Texas Reliability Entity
Yes
Texas RE voted “Negative” because in the definition of BPS the text “depending on the context: (i)”, which was copied from the RoP definition, is extraneous here because there is no part (ii), and there is no alternative meaning. There is a part (ii) in the RoP definition that NERC removed from the proposed glossary definition. As written, this extraneous language will cause confusion and lead to unneccessary disputes, as it could cause some parties to seek alternative meanings ("depending on the context") where none is intended.
Group
FirstEnergy
Sam Ciccone
Yes
Although we support NERC’s initiative to be responsive to FERC directives and do not have any issues with the definitions, we question how they relate to the NERC Glossary of Terms used in the standards. Upon review of the complete set of NERC Reliability Standards, only one of these terms, Reliability Standard, is consistently capitalized in any of the standards. Will NERC be going back and capitalizing each instance of the other two terms in the standards? If not, then we question the need for them to be placed in the Glossary of Terms since no capitalized versions exist in the standards. And if they will be capitalized in the standards, these changes should be part of this project scope, be reviewed in each instance where the term is used to determine if the meaning of any requirements may be altered in any way, and redlines included with the SAR.
Group
Dominion
Connie Lowe
No
Dominion believes the terms should be defined exactly as they are used in Section 215 as intended by Congress.
Individual
Andrew Z. Pusztai
American Transmission Company
No
Individual
John Seelke

Public Service Enterprise Group
Yes
1. The proposed definition of Bulk Power System differs from the Section 215 definition is several ways. a. The phrase ", depending on the context: (i)" is not in the Section 215 terminology. This phrase was taken from the ROP Appendix 2 definition, which has a second "(ii)" part that is not included in the statutory definition. The phrase ", depending on the context: (i)" is appropriate for the Appendix 2 definition but not the NERC Glossary definition of Bulk Power System and should be deleted. b. Although it is in the Appendix 2 definition, the phrase "an interconnected electric energy supply and transmission network" is an error that is in both the proposed Glossary definition and the Appendix 2 definition because it includes "supply and" which is not in the Section 215 definition. The Section 215 definition has the phrase "an interconnected electric energy transmission network." 2. Two proposed definitions – Bulk Power System and Reliability Standard – use the NERC Glossary term "Facilities" which is defined, in the singular "Facility," as "A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.) ." The NERC Glossary definition "Bulk Electric System" is therefore embedded into the "Facility" definition. It is inconsistent and confusing for a statutory definition to include a term that is defined by a Bulk Electric System parameter. For example, the definition of Reliability Standard uses the phrase "Bulk Power System Facilities" which infers that BPS Facilities are comprised of only BES Elements. A similar problem arises in the definition of Bulk Power System – the use of the term "Facilities" infers that the Bulk Power System is limited to BES Elements. We therefore request that "Facilities" be replaced with "facilities" in both definitions. 3. Although the proposed statutory definitions for Bulk Power System and Reliability Standard were approved by FERC in the NERC ROP changes that included Appendix 2, we request that NERC petition FERC to correct the similar Appendix 2 definitions that include the errors discussed above.
Group
Edison Electric Institute
Barbara Hindin
Yes
The Edison Electric Institute submits these comments on behalf of its member companies. EEI believes that NERC has not followed the directive in Order 693 to add the "statutory definitions" of the terms proposed to be added to the Glossary. There are important differences in the wording of the proposed defintions from the definitions of the terms set forth in FPA section 215. EEI believes that since the Glossary is used as the basis for the meaning of defined terms in Reliability Standards subject to enforcement, it is important that statutory terms be defined as thye are in the statute. The proposed defintion of Bulk Power System differs from the section 215 defintion in several ways. (1) The phrase "depending on the context (i)" is not in the section 215 definition. This phrase was taken from the Rules of Procedure Appendix 2 definition, which has a second "(ii)" part that is not included in the statutory defintion. The phrase "depending on the context" may be appropirate for the ROP defintion but not the NERC Glossary defintion, and should be deleted. (2) Although it is in the Appendix 2 defintion, the prhase "an interconnected electric energy supply and transmission network" is not appropriate in both the Glossary and Appendix 2 definitions because it includes "supply," which is not in the section 215 defintion. The section 215 defintion refers to "an interconnected electric energy and transmission network" but does not refer to supply. Two proposed defintions -- Bulk Power System and Reliability Standard" through the use of capitalization incorporate the NERC Glossary term "Facilities, " which is defined in the singular "Facility" as a set of electric equipment that opeates as a single Bulk Electric System Element...." The NERC Glossary defintion of "Bulk Electric System" is therefore incorporated by reference into the "Facility" defintion. It is not appropriate and confusing for a statutory definition to include a term that is defined by a Bulk Electric System parameter. Use of the term creates confusion as to whether BPS facilities is being defined with respect to BES Facilities. Therefore, EEI requests that "Facilities" be replaced with the statutory "facilities" in both defintions. Although the proposed statutory defintions for Bulk Power System and Reliability Standard were approved by FERC in the NERC ROP changes that included Appendix 2, EEI does not believe that is in appropriate to incorpate them into the Glossary defintions. NERC may wish to consider whether the ROP defintion should be revised to be consistent with the statutory definition. As a general matter, the use of capitalized and uncapitalized terms has created confusion, for example the use of the term "facilities" in CAN-0016. Going forward, EEI suggests that NERC review the use of such terms for consistency and clarity.

Individual
Jonathan Appelbaum
The united illuminating Company
Yes
NERC has not followed the directive in Order No. 693 to add the "statutory definitions" of the terms proposed to be added to the Glossary. There are differences in the wording of the proposed definitions from the definitions set forth in Section 215. Nerc should consider the implications of using capitalization in the definition especially with the word Facilities. As a capitalized term it will refer back to the NERC Glossary and may not have the same intent as section 215.
Individual
Esteban Martinez
Turlock Irrigation District
Yes
Without a threshold, such as voltage level, it is unclear what electric facilities are defined as BPS. It will therefore be unclear as to what electric facilities the NERC Reliability Standards will apply to.
Group
Turlock Irrigation District
Esteban Martinez
Yes
It is confusing to include a definition of the Bulk Power System (BPS) in Standards where the definition of Bulk Electric System (BES) is used for the standards. These are not synonymous terms or definitions and would create confusion rather than clarity. If BPS is a term that is statutory and added to the Reliablity Standards then BPS and BES should align in definition. BPS makes no reference to voltage threshold whereas the BES definition refers to 100kV and above. Regardless of what the voltage threshold is, there should be alignment in definition if both are to be included in the standards to avoid confusion. Without a threshold, such as voltage level, it is unclear what electric facilities are defined as BPS. It will therefore be unclear as to what electric facilities the NERC Reliability Standards will apply to.
Group
Tennessee Valley Authority (TVA)
Dennis Chastain
Yes
FERC Order 693 was issued in March 2007. In Paragraph 1897 of the Order, in response to the NOPR comments submitted by the City of Santa Clara, California on the definition of Bulk-Power System v. Bulk Electric System, FERC states that "...we clarify that the glossary governs Reliability Standards". It is not clear how the addition of the statutory definition of "Bulk-Power System" (note the statutory definition in section 215 of the FPA as amended by the Electricity Modernization Act of 2005 is hyphenated) into the NERC Glossary of Terms will be applied in the ongoing development of NERC reliability standards. Furthermore, the statutory definitions of "Reliable Operation" and "Reliability Standard" proposed for addition to the NERC glossary include the term "Bulk Power System". If the definition for a "Reliability Standard" contains the term "Bulk Power System", yet NERC is writing standards to the term "Bulk Electric System", the inclusion of these three statutory definitions into the NERC glossary at this point in time provides no additional clarity to the industry or NERC Standard Drafting Teams. In order to comply with the FERC directive in Order 693 to include these statutory definitions in the NERC glossary, TVA is voting affirmative. However, we believe the definitions added to the NERC glossary should be verbatim from section 215 of the Federal Power Act and the source identified in the glossary (see suggested text below), rather than the slightly modified versions added in Appendix 2 of the NERC Rules Of Procedure. Term - Bulk-Power System Definition - (A) Facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy. [As defined in section 215 of the United States Federal Power Act] Term - Reliability Standard Definition - A requirement, approved by the Commission[FERC] under this section[section 215 of the Federal Power Act], to provide for reliable operation of the bulk-power system. The term

includes requirements for the operation of existing bulk-power system facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the bulk-power system, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. [As defined in section 215 of the United States Federal Power Act] Term - Reliable Operation Definition - Operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements. [As defined in section 215 of the United States Federal Power Act]
Individual
Kirit Shah
Ameren
Yes
We understand that as these are statutory definitions and are identical to approved by the Commission, NERC is proposing to make no modifications but following the procedure to include them to the NERC Glossary. However, in case any modifications are pursued, we have the following comments/concerns for considerations: (1)Use of two separate terms Bulk Power System (BPS) and Bulk Electric System (BES) continues to remain confusing and at times appears to be used interchangeably. (2)The definition of "Reliability Standard" states that the term does not include any requirement to enlarge Bulk Power System Facilities or to construct new transmission capacity or generation capacity. But, it seems that the TPL standards or proposals for redundancy require "enlarging" BPS facilities and/or construct new transmission capacity. (3)The definition for "Reliable Operation" implies zero tolerance. We believe that some allowance needs to be made for a low probability of occurrence of system failure in this definition. We suggest inclusion of the following or similar concept: “Reliable Operation” means operating the Elements of the Bulk Power System within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or Cascading failures of such system has an acceptable low probability of occurrence as a result of a sudden disturbance, including a Cyber Security Incident, or unanticipated failure of system Elements.
Individual
Charles Yeung
Southwest Power Pool Inc
Yes
Although the reliability standards clearly are mandated by legislative language to apply to all users of the Bulk Power System, the change of the term “electric transmission…” to “electric supply and transmission…” distinctly identifies authority over electric suppliers without restriction. This could be misinterpreted to include authority to order construction and/or expansion of electric supply (generator) facilities. The existing unaltered legislative language along with clarifying language asserting authority over all users of the Bulk Power System is understood and appropriate for fulfilling the legislative mandate.
Individual
Keith Morisette
Tacoma Power
Yes
Tacoma Power appreciates the opportunity to comment on these proposed definitions. We believe the definitions need to be changed to avoid confusion in the standards and their applicability for compliance monitoring and auditing. We suggest changing the proposed definition of “Reliability Standard” by removing Bulk Power System and replacing it with the term Bulk Electric System. The Reliability Standards need to use the Bulk Electric System definition as accepted by the industry, NERC and FERC. Additionally, we suggest changing the proposed definition of “Reliable Operation” by striking the phrase, “… including a Cyber Security Incident, …” because a Cyber Security Incident is appropriately addressed within the CIPs standards and it is confusing to reference it in this definition.
Individual

Linda Jacobson-Quinn
FEUS
Yes
Comments: FEUS is concerned with the modifications made to the definition of the Bulk Power System (BPS). While the definition proposed here matches the definition included in the NERC Rules of Procedure (ROP), it differs from the definition included in FERC Order 693 and Section 215 of the Energy Policy Act; both of which were fomalized prior to the modification NERC ROP. The proposed definition for BPS now includes 'depending on the context' which is ambiguous and unclear. In addition, 'supply and' was added in the context of (i). FEUS recommends removing the added language in both instances to align the definition with the already established definition in Section 215 and Order 693.
Individual
Rhonda Bryant
El Paso Electric Company
Yes
First, the proposed definitions do not mirror the statutory language in Section 215 of the Federal Power Act. The deviation EPE finds particularly objectionable is the proposed use of the words "electric energy supply and transmission network" in the definition of "bulk power system" when the statute uses the words "electric energy transmission network." The addition of the words "supply and" in the proposed definition could be read to stretch the scope of the facilities subject to FERC's reliability jurisdiction beyond what Congress intended (and specifically defined) in the statute. Second, there is a need for NERC to address whether the term "bulk power system" is intended to replace the currently-effective term, "bulk electric system." EPE's understanding from discussions in the standards development process is that the "bulk electric system" definition will continue in effect, and be used as a type of subset under the definition of "bulk power system." It is important for voting entities to be informed of the context in which the definition is proposed for effectiveness. We urge NERC to address how the proposed definition of "bulk power system" is intended to be implemented in measuring compliance with the various reliability standards: Specifically: 1) Will the definition of "bulk power system" be used in addition to – or in place of – the definition of "bulk electric system"? 2) If both terms are to be used, will each reliability standard be modified to identify whether it applies to the "bulk power system" or the "bulk electric system"? 3) Will the currently-effective threshold of 100 kV remain in effect, such that all such facilities within the definition of "bulk electric system" will be assumed by NERC and the regional entities to be subsumed within the definition of "bulk power system"? 4) Does NERC envision conducting or directing an assessment of each TO/TP's transmission assets to delineate which lines (regardless of voltage) fall within the "bulk power system" definition of "necessary for operating an interconnected electric energy transmission network"? EPE urges continuation of the 100 kV threshold. 5) Will NERC exclude from the parameters of "bulk power system" radial transmission lines in the same manner as those lines are excluded from the definition of "bulk electric system" today? EPE would like for any proposed definition to speak directly to the exclusion of radial lines.
Individual
Shari Heino
Brazos Electric Power Cooperative Inc.
Yes
"Facilities" in the definition of "Bulk Power System" should not be capitalized in the RoP because it is not capitalized in the statute.
Individual
Diane Barney
New York State Dept of Public Svc
Yes
There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies will increase confusion of what constitutes the Bulk Power System. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes.

Individual
Terri Pyle
Oklahoma Gas & Electric
Yes
Regarding the proposed NERC Glossary definition for Bulk Power System: 1. The proposed wording includes "an interconnected electric energy supply and transmission network" while the Section 215 wording is "an interconnected electric energy and transmission network". It is recommended that the NERC Glossary of Terms definition reflect the wording in 215, or "an interconnected electric energy and transmission network". 2. The addition of the phrase "depending on the context" could lead to additional ambiguity.
Individual
Maggy Powell
Exelon Corporation and its affiliates
Yes
Exelon supports and reiterates the comments submitted by EEI.
Individual
Eric Salsbury
Consumers Energy
Yes
- It is unclear whether the terms Bulk Electric System and Bulk Power System are meant to be synonymous. Please clarify this. - The word “facilities” should not be capitalized. With Facility capitalized along with Bulk Power System, the industry will equate Bulk Power System directly to Bulk Electric System (see previous comment), 100kV and above. We recommend that Facility not be capitalized unless it is NERC’s intent to have Bulk Electric System and Bulk Power System mean the same thing. -Language should be added to the definition for Bulk Power System. It should read – “Bulk Power System” means, depending on the context: (i) Facilities and control systems necessary for operating an interconnected electric energy supply and transmission network (or any portion thereof), and electric energy from generating facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy or radial lines connecting generation facilities to the transmission system. - Should the Bulk Power System definition reference "depending on the context"? If the term is being defined, should it be open for contextual redefinition?
Individual
RoLynda Shumpert
South Carolina Electric and Gas
Yes
SCE&G does not agree with the inclusion of the proposed statutory definitions in the NERC Glossary of Terms. While the definition of Bulk Power System is utilized by FERC, it is broader in scope than the currently defined "Bulk Electric System," and; therefore, the proposed statutory definitions "Reliability Standard" and "Reliable Operation" should reference the currently defined "Bulk Electric System" and not "Bulk Power System" or they will potentially change the scope of the NERC Reliability Standards.
Individual
Roger Dufresne
Hydro-Québec Production
Yes
The NERC proposal implies an interpretation of the context which differs from the section 215 of the Federal Power Act. We believe that this definition could open the door to application of the NERC standards in areas where there are not required for the reliability of interconnected electric systems and for that reason, NERC should incorporate the definitions exactly as they appear in the statutory glossary. NERC should also define the meaning of 'necessary' in the definition in order to eliminate confusion.
Individual
Joe Tarantino

Sacramento Municipal Utility District
Yes
The current language for the proposed definitions is lengthy and unclear. Although we are in support of the definitions we do urge the revision to the defintions that provide a more precise definition. Please find the following suggetions: Bulk Power System—An electrical network consisting of the facilities for control and transmission of electrical energy from generation sources to load centers. Bulk Power Systems do not include facilities used for the local distribution of electric energy. Reliability Standard—A standard used to establish minimum requirements for design, reliable operation, and security for Bulk Power System facilities and for the training of operators of the Bulk Power System. A reliability standard does not require Bulk Power System expansion or the addition of new transmission or generation capacity. A Reliability Standard becomes effective in the United States upon approval by the Federal Regulatory commission and in other jurisdictions as made or allowed by the Applicable Governmental Authority. Reliable Operation—The operation of a Bulk Power System in accordance with Reliability Standards, accepted electric utility practices, and parameters for thermal, voltage, and stability limits to avoid unnecessary separation of system facilities and cascading failures due to a system element failure, instability, or a security problem. Thank you for your consideration.
Group
Bonneville Power Administration
Chris Higgins
Yes
BPA continues to be concerned with the intermingling of dual terms "Bulk Power System" and "Bulk Electric System"; it continues to cause confusion in the industry. The definition of “Reliability Standard” to be added to the Glossary applies the standards to the Bulk Power System. The definition of “Reliable Operation” to be added to the Glossary refers to the reliable operation of the Bulk Power System. Once these definitions are added to the Glossary, how and where does NERC propose to limit the applicability of the Reliability Standards and the scope of the term Reliable Operation to the Bulk Electric System?
Group
PPL Corporation NERC Registered Affiliates
Stephen J. Berger
Yes
The PPL Companies appreciate the attempt by NERC to comply with FERC directives. However, we do have concerns that the definitions of these terms do not match the statutory definitions in §215 of the Federal Power Act. Neither NERC nor FERC may change FERC's statutory powers under Section 215. To create new definitions strictly for the NERC Glossary is confusing and counterproductive. Entities should be able to look to the statute as the ultimate authority, and by creating these new definitions, this is made unclear. Suggested defintions are below. “Bulk Power System” means (A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy. “Reliability Standard” means a requirement, approved by the Commission under this section, to provide for reliable operation of the bulk-power system. The term includes requirements for the operation of existing bulk-power system facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the bulk-power system, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. “Reliable Operation” means operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.
Individual
Michiko Sell
Public Utility District No. 2 of Grant County, WA
Yes

The proposed definition of Bulk Power System contained in Project 2012-08 has been modified from the statutory definition contained in the Federal Power Act. As such, the NERC definition of Bulk Power System will not agree with FERC's statutory definition. The addition of "depending on the context" leads to ambiguity in the application of the defined term. Distinguishing between an "interconnected electric energy supply and transmission network" appears to be an expansion of system applicability within the definition. In addition to the concerns listed, has FERC directed NERC to revise the definition of the Bulk Power System? Per Order 693, the ERO has the authority to define the Bulk Electric System, but the Commission has jurisdiction over the definition of Bulk Power System. I see the Order to revise the glossary, but not the statutory definition.
Individual
Brett Holland
Kansas City Power & Light
Yes
KCP&L wishes to adjoin the company and endorse the comments of the Edison Electric Institute.
Individual
Jason Snodgrass
Georgia Transmission Corporation
Yes
The introduction to the NERC Glossary states "This Glossary lists each term that was defined for use in one or more of NERC's continent-wide or Regional Reliability Standards…". Accordingly, as mentioned in paragraph 1894 listed in the SAR, "the Reliability Standards refer to the bulk electric system, which is also defined in the glossary." Inserting the proposed statutory definitions without modification could have a negative impact and conflicting circular references between the two terms BPS and BES when Reliability Standard only captures the term BPS; which would be inconsistent with the stated purpose of the NERC Glossary identified above. Additionally, GTC has concern there is a potential risk of expanding jurisdictional exposure to Reliability Standards if these terms were approved within the NERC Glossary without modification and subsequently included within the language of a Reliability Standard requirement. Lastly, GTC feels it is important that the industry maintain a primary role in the standards development process and disagrees with the recommendation to waive the requirement for posting for industry comment thus pushing the definitions straight to industry ballot when even the Commission directed the ERO to modify the glossary through the Reliability Standards development process.
Individual
Steven Powell
Trans Bay Cable
Yes
Why have a BES and BPS definition? There has not been enough clarity on why NERC wants two definitions. Also, no clarity in regards to the opening context of, "depending on the context" this leaves a lot to intrepretation.
Individual
Laurie Williams
Public Service Company of New Mexico
Yes
PNM supports the comments filed by EEI.
Group
ISO RTO Standards Review Committee
Terry Bilke
Yes
There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what constitutes Bulk Power System. Use of the term "supply" could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without

capitalization and punctuation changes..
Individual
Rod Noteboom
Pubilic Utility District #2 of Grant County, Washington
Yes
See comments submitted by GCPD Segment 5 ballot member.
Group
JEA
Tom McElhinney
Yes
This seems like scope creep. The original intent was for the reliable operation of the BES. It now appears that the term “BES” is being replaced by the term “BPS” which includes the control systems. Concerns on the individual definitions are as follows: • Bulk Power System: It is confusing to say the definition ‘depends on the context’ and then to not provide multiple definitions. The “and” used between the two possible definitions should be replaced with an “or”. The definition of a Facility is “a set of electrical equipment that operates as a single BES Element” so basically the BPS is the BES plus control systems. The last sentence is redundant since it uses a defined term “Facilities” in the first sentence and then “facilities” a non-defined term in the last sentence when it is clear that they are referencing “Facilities” from the first sentence and that already does not include local distribution. It would be better to delete the last sentence. It is also vague to say “needed to maintain transmission system reliability” when “transmission system reliability” is not defined – a better approach would be to replace “transmission system reliability” with “Reliable Operation of the BES”. It also appears confusing to say “any portion thereof” when referencing the transmission network – things are either part of the network or they are not and this may lead to creep in the definition. • Reliability Standard: Requirements are a subset of a Reliability Standard – not the standard itself so the definition should not state “a requirement” but instead something to the effect of “a set of requirements, measures, and severity levels”. Also Reliability standards were developed for the reliable operation of the BES and now this is causing scope creep by using the term BPS. BPS should be replaced with BES in all occurrences. The term “including” does not “limit” so the phrase “without limiting the foregoing” is redundant. The last part of the first sentence “to the extent necessary for Reliable Operations of the Bulk Power System” is redundant with the first part “to provide for Reliable Operation of the Bulk Power System” and should therefore be removed. Also the rest of the first sentence “but the term does not include any requirements to enlarge Bulk Power System Facilities or to construct new transmission capacity or generation capacity” should also be removed. The problems with that part are twofold. First, Facilities are defined in reference to the BES not to the BPS and secondly this last part would mean that entities would never have to construct new transmission capacity or generation capacity but the standards are clearly intended to insure an adequate supply to meet load which sometimes necessitates building new generation or transmission lines to meet anticipated growth. • Reliable Operation: The “Bulk Power System” should be replaced with the “Bulk Electric System”. By using BPS we will need monitoring equipment on all of our control systems to insure such things as proper voltage. Major systems have this in the form of UPS’s but some subcomponents of the control systems may not.
Individual
Tony Kroskey
Brazos Electric Power Cooperative Inc.
Yes
In the definition of "Bulk Power System" the word "Facilities" should not be capitalized in the RoP because it is not capitalized in the statute. There is included an "(i)" in the proposed definition, but there is no "(ii)" which is confusing. Also the addition of the word "supply" has the potential to change the definition. In the definition of "Reliable Operation" the words "will not occur" should be changed to "should not occur".

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Consideration of Comments

Phase 1 of Glossary Updates: Statutory Definitions
Project 2012-08.1

The Project 2012-08.1 Drafting Team thanks all commenters who submitted comments on the Phase 1 of Glossary Updates: Statutory Definitions. The Phase 1 Glossary Updates were posted for a 45-day public comment period from June 19, 2012 through August 2, 2012. Stakeholders were asked to provide feedback on the Glossary Updates and associated documents through an electronic comment form. There were 60 sets of comments, including comments from approximately 159 different people from approximately 104 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's project page.

If you feel that your comment has been overlooked, 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 of Standards and Training, Mark Lauby, at 404-446-9723 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.[1]

[1] The appeals process is in the Standard Processes Manual: http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf

Index to Questions, Comments, and Responses

The Industry Segments are:

1 — Transmission Owners
2 — RTOs, ISOs
3 — Load-serving Entities
4 — Transmission-dependent Utilities
5 — Electric Generators
6 — Electricity Brokers, Aggregators, and Marketers
7 — Large Electricity End Users
8 — Small Electricity End Users
9 — Federal, State, Provincial Regulatory or other Government Entities
10 — Regional Reliability Organizations, Regional Entities

Group/Individual	Commenter	Organization	Registered Ballot Body Segment									
			1	2	3	4	5	6	7	8	9	10
1. Group	Sasa Maljukan	Hydro One	X									

	Additional Member	Additional Organization	Region	Segment Selection
1.	David Kiguel	Hydro One networks Inc.	NPCC	1

2. Group	Guy Zito	Northeast Power Corodinating Council										X

	Additional Member	Additional Organization	Region	Segment Selection
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10
2.	Carmen Agavriloai	Independent Electricity System Operator	NPCC	2
3.	Greg Campoli	New York Independent System Operator	NPCC	2
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
5.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1
6.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10

Group/Individual	Commenter	Organization	Registered Ballot Body Segment									
			1	2	3	4	5	6	7	8	9	10

7.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5
8.	Kathleen Goodman	ISO - New England	NPCC	2
9.	Michael Jones	National Grid	NPCC	1
10.	David Kiguel	Hydro One Networks Inc.	NPCC	1
11.	Michael R. Lombardi	Northeast Utilities	NPCC	1
12.	Randy MacDonald	New Brunswick Power Transmission	NPCC	9
13.	Bruce Metruck	New York Power Authority	NPCC	6
14.	Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
15.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
16.	Robert Pellegrini	The United Illuminating Company	NPCC	1
17.	Si-Truc Phan	hydro-Quebec TransEnergie	NPCC	1
18.	David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
19.	Brian Robinson	Utility Services	NPCC	8
20.	Michael Schiavone	National Grid	NPCC	1
21.	Wayne Sipperly	New York Power Authority	NPCC	5
22.	Donald Weaver	New Brunswick System Operator	NPCC	2
23.	Ben Wu	Orange and Rockland Utilities	NPCC	1
24.	Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3

3.	Group	Steve Alexanderson P.E.	Western Small Entity Comment Group			X	X					X	

	Additional Member	Additional Organization	Region	Segment Selection
1.	Eric Scott	City of Palo Alto	WECC	3
2.	Russ Schneider	Flathead Electric	WECC	3, 4
3.	Dale Dunckel	Okanogan PUD	WECC	1
4.	Ronald Sporseen	Blachly-Lane Electric Cooperative	WECC	3
5.	Ronald Sporseen	Central Electric Cooperative	WECC	3
6.	Ronald Sporseen	Clearwater Power Company	WECC	3
7.	Ronald Sporseen	Douglas Electric Cooperative	WECC	3
8.	Ronald Sporseen	Fall River Rural Electric Cooperative	WECC	3
9.	Ronald Sporseen	Northern Lights	WECC	3
10.	Ronald Sporseen	Lane Electric Cooperative	WECC	3
11.	Ronald Sporseen	Lincoln Electric Cooperative	WECC	3

Group/Individual	Commenter	Organization	Registered Ballot Body Segment									
			1	2	3	4	5	6	7	8	9	10

12.	Ronald Sporseen	Raft River Rural Electric Cooperative	WECC	3
13.	Ronald Sporseen	Lost River Electric Cooperative	WECC	3
14.	Ronald Sporseen	Salmon River Electric Cooperative	WECC	3
15.	Ronald Sporseen	Umatilla Electric Cooperative	WECC	3
16.	Ronald Sporseen	Coos-Curry Electric Cooperative	WECC	3
17.	Ronald Sporseen	West Oregon Electric Cooperative	WECC	3
18.	Ronald Sporseen	Consumers Power	WECC	1, 3
19.	Ronald Sporseen	Pacific Northwest Generating Cooperative	WECC	3, 4, 8
20.	Ronald Sporseen	Power Resources Cooperative	WECC	5

4.	Group	WILL SMITH	MRO NSRF	X	X	X	X	X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	MAHMOOD SAFI	OPPD	MRO	1, 3, 5, 6
2.	CHUCK LAWRENCE	ATC	MRO	1
3.	TOM BREENE	WPS	MRO	3, 4, 5, 6
4.	JODI JENSON	WAPA	MRO	1, 6
5.	KEN GOLDSMITH	ALTW	MRO	4
6.	ALICE IRELAND	XCEL	MRO	1, 3, 5
7.	DAVE RUDOLPH	BEPC	MRO	1, 3, 5, 6
8.	ERIC RUSKAMP	LES	MRO	1, 3, 5, 6
9.	JOE DEPOORTER	MGE	MRO	3, 4, 5, 6
10.	SCOTT NICKELS	RPU	MRO	4
11.	TERRY HARBOUR	MEC	MRO	6, 1, 3, 5
12.	MARIE KNOX	MISO	MRO	2
13.	LEE KITTELSON	OTP	MRO	1, 3, 4, 5
14.	SCOTT BOS	MPW	MRO	1, 3, 5, 6
15.	TONY EDDLEMAN	NPPD	MRO	1, 3, 5
16.	MIKE BRYTOWSKI	GRE	MRO	1, 3, 5, 6
17.	DAN INMAN	MPC	MRO	1, 3, 5, 6

5.	Group	Kent Kujala	Detroit Edison			X	X	X					

	Additional Member	Additional Organization	Region	Segment Selection
1.	Jeffrey DePriest		RFC	3, 4, 5

Group/Individual	Commenter	Organization	Registered Ballot Body Segment									
			1	2	3	4	5	6	7	8	9	10

2.	Alexander Eizans		RFC	3, 4, 5
3.	Thomas Tanciar		RFC	3, 4, 5
4.	Barbara Holland		RFC	3, 4, 5

6.	Group	Sam Ciccone	FirstEnergy	X		X	X	X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	William J Smith (VOTER)	FirstEnergy Corp	RFC	1
2.	Stephan Kern (VOTER)	FirstEnergy Energy Delivery	RFC	3
3.	Douglas Hohlbaugh (VOTER)	Ohio Edison Company	RFC	4
4.	Kenneth Dresner (VOTER)	FirstEnergy Solutions	RFC	5
5.	Kevin Querry (VOTER)	FirstEnergy Solutions	RFC	6

7.	Group	Connie Lowe	Dominion	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Louis Slade		RFC	5, 6
2.	Mike Garton		NPCC	5, 6
3.	Michael Crowley		SERC	1, 3
4.	Randi Heise		MRO	5, 6

8.	Group	Barbara Hindin	Edison Electric Institute	X		X		X					

Additional members listed here: http://www.eei.org

9.	Group	Dennis Chastain	Tennessee Valley Authority (TVA)	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	DeWayne Scott	TVA	SERC	1
2.	Ian Grant	TVA	SERC	3
3.	David Thompson	TVA	SERC	5
4.	Marjorie Parsons	TVA	SERC	6

10.	Group	Chris Higgins	Bonneville Power Administration	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Steve	Larson	WECC	1, 3, 5, 6
2.	Fran	Halpin	WECC	5
3.	Rebecca	Berdahl	WECC	3

Group/Individual	Commenter	Organization	Registered Ballot Body Segment									
			1	2	3	4	5	6	7	8	9	10

4.	Jim	Burns	WECC	1
5.	Erika	Doot	WECC	3, 5, 6
6.	Paul	Fiedler	WECC	1
7.	John	Anasis	WECC	1
8.	Don	Watkins	WECC	1

11.	Group	Stephen J. Berger	PPL Corporation NERC Registered Affiliates	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Brenda L. Truhe	PPL Electric Utilities Corporation	RFC	1
2.	Brent Ingebrigtson	LG&E and KU Services	SERC	3
3.	Annette M. Bannon	PPL Generation, LLC on behalf of its Supply NERC Registered Entities	RFC	5
4.			WECC	5
5.	Elizabeth A. Davis	PPL EnergyPlus, LLC	MRO	6
6.			NPCC	6
7.			SERC	6
8.			SPP	6
9.			RFC	6
10.			WECC	6

12.	Group	Terry Bilke	ISO RTO Standards Review Committee		X								

	Additional Member	Additional Organization	Region	Segment Selection
1.	Kathleen Goodman	ISONE	NPCC	2
2.	Charles Yeung	SPP	SPP	2
3.	Stephanie Monzon	PJM	RFC	2
4.	Steve Meyers	ERCOT	ERCOT	2
5.	Ben Li	IESO	NPCC	2

13.	Group	Tom McElhinney	JEA	X		X		X					

	Additional Member	Additional Organization	Region	Segment Selection
1.	Ted Hobson		FRCC	1
2.	Garry Baker		FRCC	3
3.	John Babik		FRCC	5

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
14.	Individual	Janet Smith	Arizona Public Service Company	X		X		X	X				
15.	Individual	Brenda Hampton	Luminant						X				
16.	Individual	Esteban Martinez	Turlock Irrigation District	X		X	X	X	X				
17.	Individual	Scott Bos	Muscatine Power and Water	X		X		X	X				
18.	Individual	Scott McGough	Georgia System Operations			X							
19.	Individual	Howard Rulf	Wisconsin Electric dba We Energies			X	X	X					
20.	Individual	Darryl Curtis	Oncor Electric Delivery Company LLC	X									
21.	Individual	Wayne Sipperly	New York Power Authority	X		X		X	X				
22.	Individual	Donald E Nelson	Ma Department of Public Utilities									X	
23.	Individual	Anthony Jablonski	ReliabilityFirst										X
24.	Individual	Pablo OÃ±ate	El Paso Electric	X		X		X	X				
25.	Individual	Fred Plett	Massachusetts Attorney General									X	
26.	Individual	Kelsi Oswald	Pinellas County					X					
27.	Individual	PHAN, Si Truc	Hydro-Quebec TransÃ‰nergie	X									
28.	Individual	Andrew Gallo	City of Austin dba Austin Energy	X		X	X	X	X				
29.	Individual	Chris de Graffenried	Consolidated Edison Co. of NY, Inc.	X		X		X	X				
30.	Individual	Thad Ness	American Electric Power	X		X		X	X				
31.	Individual	Jack Stamper	Clark Public Utilities	X									
32.	Individual	D Mason	HHWP	X				X					
33.	Individual	Michelle R D'Antuono	Ingleside Cogeneration LP (affiliate of Occidental Chemical Corporation)					X					
34.	Individual	Kathleen Goodman	ISO New England		X								
35.	Individual	Dave Willis	Idaho Power Co.	X		X							
36.	Individual	Don Jones	Texas Reliability Entity										X
37.	Individual	Andrew Z. Pusztai	American Transmission Company	X									
38.	Individual	John Seelke	Public Service Enterprise Group	X		X		X	X				

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
39.	Individual	Jonathan Appelbaum	The united illuminating Company	X									
40.	Individual	Esteban Martinez	Turlock Irrigation District	X		X	X	X	X				
41.	Individual	Kirit Shah	Ameren	X		X		X	X				
42.	Individual	Charles Yeung	Southwest Power Pool Inc		X								
43.	Individual	Keith Morisette	Tacoma Power	X		X	X	X	X				
44.	Individual	Linda Jacobson-Quinn	FEUS			X							
45.	Individual	Rhonda Bryant	El Paso Electric Company			X							
46.	Individual	Shari Heino	Brazos Electric Power Cooperative Inc.	X				X					
47.	Individual	Diane Barney	New York State Dept of Public Svc									X	
48.	Individual	Terri Pyle	Oklahoma Gas & Electric	X		X		X					
49.	Individual	Maggy Powell	Exelon Corporation and its affiliates	X		X		X	X				
50.	Individual	Eric Salsbury	Consumers Energy			X	X	X					
51.	Individual	RoLynda Shumpert	South Carolina Electric and Gas	X		X		X	X				
52.	Individual	Roger Dufresne	Hydro-QuÃ©bec Production					X					
53.	Individual	Joe Tarantino	Sacramento Municipal Utility District	X		X	X	X	X				
54.	Individual	Michiko Sell	Public Utility District No. 2 of Grant County, WA	X		X	X	X	X				
55.	Individual	Brett Holland	Kansas City Power & Light	X		X		X	X				
56.	Individual	Jason Snodgrass	Georgia Transmission Corporation	X									
57.	Individual	Steven Powell	Trans Bay Cable	X									
58.	Individual	Laurie Williams	Public Service Company of New Mexico	X		X		X	X				
59.	Individual	Rod Noteboom	Pubilic Utility District #2 of Grant County, Washington	X		X	X	X	X				
60.	Individual	Tony Kroskey	Brazos Electric Power Cooperative Inc.	X									

1. **Do you have any comments regarding the inclusion of the statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards?**

Summary Consideration: A majority of the commenters disagreed with the proposed definitions deviating from the statutory language that FERC directed NERC to adopt in Order No. 693. Many of the commenters that disagreed with having conflicting definitions also expressed concerns: 1) that FERC/NERC was expanding jurisdiction; 2) the additional words or change in wording allowed for different interpretations; 3) there was no distinction between the terms "Bulk-Power System" and "Bulk Electric System," and 4) there were differences in capitalization of certain words. One commenter did not agree with a continent-wide ERO adopting language as it appears in the [United States] Federal Power Act. Several commenters disagreed with the statutory definitions including the phrases that: 1) included "cybersecurity;" 2) does not include requirements to enlarge or construct of facilities; and 3) addressed local distribution facilities. One commenter asserted that there was a misunderstanding of the standards development process by arguing that terms should only be added to the NERC Glossary as they are introduced in the development or revision of a standard; terms should be revised as a particular standard is developed.

The rest of the commenters agreed with the definitions, and some provided other specific suggestions or additions to the proposed definitions.

Organization	Yes or No	Question 1 Comment
Dominion	No	Dominion believes the terms should be defined exactly as they are used in Section 215 as intended by Congress.
Response: Thank you for your response, and the terms "Bulk-Power System" ("BPS"), "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Oncor Electric Delivery Company LLC	No	
American Transmission Company	No	

Organization	Yes or No	Question 1 Comment
Hydro One	Yes	There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what constitutes Bulk Power System. Use of the term “supply” could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes.
Response: Thank you for your response, and in order to avoid inconsistency, the terms “Bulk-Power System,” “Reliability Standard,” and “Reliable Operation” will be re-posted with definitions that match the statutory language exactly. There will be no additional changes to capitalization or punctuations.		
Northeast Power Coordinating Council	Yes	There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what constitutes Bulk Power System. Use of the term “supply” could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes. The word “necessary” is also used in the definition. The use of the term ''necessary'' can be left to interpretation. What “Facilities and control systems...” are necessary? For example, a 345kV Phase Angle Regulator might be useful for maintaining transactions, but because of the system configuration does not increase system reliability pre and post contingency. What is meant by “depending on the context”? This implies that there are multiple definitions of “Bulk Power System”. What are they?
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms “Bulk-Power System,”		

Organization	Yes or No	Question 1 Comment
"Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. The additional phrases and words will be removed in the next re-posting of the definitions.		
Western Small Entity Comment Group	Yes	A)The definition of Bulk Power System varies from the FPA definition by the inclusion of the words "depending on the context." 1) We are unsure that either NERC or FERC have the authority to overrule the definition established by Congress. 2) It is unclear what the added words are intended to achieve, and just how far "the context" may allow the the definition to deviate from the listed items. B) The definition of Reliability Standard varies from the FPA definition by the inclusion of the words "without limiting the foregoing." 1) We are again concerned regarding the authority of NERC and FERC to change what has been established by Congress. 2) The added words only add confusion. Once inside the NERC glossary, the "foregoing" will consist of all the definitions preceding it in the alphabet, and none of those following. We don't believe a definition should rely on its place in the alphabet.
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. The additional phrases and words will be removed in the next re-posting of the definitions.		
MRO NSRF	Yes	Bulk Power System: The NSRF believes that to reduce any confusion that it is NERC's intent to not capatilize the word "facilities." Recommend to read, "Bulk Power System means, facilities ..."The NSRF understands that the Commission has directed NERC to include the term "Bulk Power System" in the NERC glossary and this seems to leave NERC very little choice but to address FERC's request. However, NSRF wishes to make it quite clear that it is inappropriate to use the highly unbounded term "Bulk Power System" in a NERC Reliability Standard as compliance cannot be quantified when using an unbounded term. Therefore, a NERC Standards Drafting Team should not use the unbounded term "Bulk Power System" in a new or revised NERC

Organization	Yes or No	Question 1 Comment
		Standard until “Bulk Power System” is clearly defined, similar to the “bright-line” Bulk Electric System. If “Bulk Power System” should not be used in a NERC Reliability Standard, then the FERC decision to direct NERC to include “Bulk Power System” in the NERC glossary is not without defect and the FERC directive should be rescinded.Reliability Standard: NERC has capatilized the word Facility in this definition. NERC’s glossary defines “Facility” as: A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.). With “Facility” capatilized along with Bulk Power System, the industry will equate Bulk Power System directly to Bulk Electric System, 100kV and above. Recommend that “Facility” not be capatilized unless it is NERC’s intent to have BES and BPS to mean the same. Reliable Operation: No comments, thank you.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms “Bulk-Power System,” “Reliability Standard,” and “Reliable Operation” will be re-posted with definitions that match the statutory language exactly. By using the statutory language, the issue of conflicting capitalizations is avoided. Also, use of a specific NERC glossary term in a standard is determined by the standards drafting team and must be approved by industry through the Standards Development Process.		
Detroit Edison	Yes	Bulk Power System- add to the last sentence- The term does not include facilities used in the local distribution of electric energy "or radial lines connecting generation facilities to the Transmission system". Reliability Standard- change the wording of the beginning of the first sentense to read- a document containing one or more requirements to provide for the Reliable Operation of the Bulk Power System. REMOVE the following- including without limiting the foregoing, requirements for the operation of existing Bulk Power System Facilities, including cyber security protection, and including the design of planned additions or modifications to such Facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge Bulk Power System

Organization	Yes or No	Question 1 Comment
		Facilities or to construct new transmission capacity or generation capacity. Leave the last sentence about FERC approval. Bulk Power System - remove "depending on the context:" This implies multiple definitions and there is only one provided. Reliability Standard - change first sentence "means a requirement to provide for..." to "means a requirement or set of requirements to provide for..."
Response: Thank you for your response. The terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
FirstEnergy	Yes	Although we support NERC's initiative to be responsive to FERC directives and do not have any issues with the definitions, we question how they relate to the NERC Glossary of Terms used in the standards. Upon review of the complete set of NERC Reliability Standards, only one of these terms, Reliability Standard, is consistently capitalized in any of the standards. Will NERC be going back and capitalizing each instance of the other two terms in the standards? If not, then we question the need for them to be placed in the Glossary of Terms since no capitalized versions exist in the standards. And if they will be capitalized in the standards, these changes should be part of this project scope, be reviewed in each instance where the term is used to determine if the meaning of any requirements may be altered in any way, and redlines included with the SAR.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Further, since capitalized terms signify that a standard has adopted a particular Glossary definition, the new definitions proposed herein will not affect non-capitalized terms in existing standards.		
Edison Electric Institute	Yes	The Edison Electric Institute submits these comments on behalf of its member companies. EEI believes that NERC has not followed the directive in

Organization	Yes or No	Question 1 Comment
		Order 693 to add the "statutory definitions" of the terms proposed to be added to the Glossary. There are important differences in the wording of the proposed defintions from the definitions of the terms set forth in FPA section 215. EEI believes that since the Glossary is used as the basis for the meaning of defined terms in Reliability Standards subject to enforcement, it is important that statutory terms be defined as thye are in the statute. The proposed defintion of Bulk Power System differs from the section 215 defintion in several ways. (1) The phrase "depending on the context (i)" is not in the section 215 definition. This phrase was taken from the Rules of Procedure Appendix 2 definition, which has a second "(ii)" part that is not included in the statutory defintion. The phrase "depending on the context" may be appropirate for the ROP defintion but not the NERC Glossary defintion, and should be deleted. (2) Although it is in the Appendix 2 defintion, the prhase "an interconnected electric energy supply and transmission network" is not appropriate in both the Glossary and Appendix 2 definitions because it includes "supply," which is not in the section 215 defintion. The section 215 defintion refers to "an interconnected electric energy and transmission network" but does not refer to supply.Two proposed defintions -- Bulk Power System and Reliability Standard" through the use of capitalization incorporate the NERC Glossary term "Facilities, " which is defined in the singular "Facility" as a set of electric equipment that opeates as a single Bulk Electric System Element...." The NERC Glossary defintion of "Bulk Electric System" is therefore incorporated by reference into the "Facility" defintion. It is not appropriate and confusing for a statutory definition to include a term that is defined by a Bulk Electric System parameter. Use of the term creates confusion as to whether BPS facilities is being defined with respect to BES Facilities. Therefore, EEI requests that "Facilities" be replaced with the statutory "facilities" in both defintions.Although the proposed statutory defintions for Bulk Power System and Reliability Standard were approved by FERC in the NERC ROP

Organization	Yes or No	Question 1 Comment
		changes that included Appendix 2, EEI does not believe that is in appropriate to incorpate them into the Glossary defintions. NERC may wish to consider whether the ROP defintion should be revised to be consistent with the statutory definition.As a general matter, the use of capitalized and uncapitalized terms has created confusion, for example the use of the term "facilities" in CAN-0016. Going forward, EEI suggests that NERC review the use of such terms for consistency and clarity.
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. By matching the exact wording in the Federal Power Act, the issue of conflicting capitalized terms is avoided. Also, any necessary changes to the Rules of Procedure will be addressed in a separate project.		
Tennessee Valley Authority (TVA)	Yes	FERC Order 693 was issued in March 2007. In Paragraph 1897 of the Order, in response to the NOPR comments submitted by the City of Santa Clara, California on the definition of Bulk-Power System v. Bulk Electric System, FERC states that "...we clarify that the glossary governs Reliability Standards". It is not clear how the addition of the statutory definition of "Bulk-Power System" (note the statutory definition in section 215 of the FPA as amended by the Electricity Modernization Act of 2005 is hyphenated) into the NERC Glossary of Terms will be applied in the ongoing development of NERC reliability standards. Furthermore, the statutory definitions of "Reliable Operation" and "Reliability Standard" proposed for addition to the NERC glossary include the term "Bulk Power System". If the definition for a "Reliability Standard" contains the term "Bulk Power System", yet NERC is writing standards to the term "Bulk Electric System", the inclusion of these three statutory definitions into the NERC glossary at this point in time provides no additional clarity to the industry or NERC Standard Drafting Teams.In order to comply with the FERC directive in Order 693 to include these statutory definitions in the NERC glossary, TVA is voting affirmative. However, we believe the definitions added to the NERC glossary should be

Organization	Yes or No	Question 1 Comment
		verbatim from section 215 of the Federal Power Act and the source identified in the glossary (see suggested text below), rather than the slightly modified versions added in Appendix 2 of the NERC Rules Of Procedure.Term - Bulk-Power SystemDefinition - (A) Facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy. [As defined in section 215 of the United States Federal Power Act]Term - Reliability Standard Definition - A requirement, approved by the Commission[FERC] under this section[section 215 of the Federal Power Act], to provide for reliable operation of the bulk-power system. The term includes requirements for the operation of existing bulk-power system facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the bulk-power system, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. [As defined in section 215 of the United States Federal Power Act]Term - Reliable Operation Definition - Operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements. [As defined in section 215 of the United States Federal Power Act]
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Therefore, the terms added to the NERC Glossary of Terms will be consistent with the definitions and applications as defined in Section 215 of the Federal Power Act.		

Organization	Yes or No	Question 1 Comment
Bonneville Power Administration	Yes	BPA continues to be concerned with the intermingling of dual terms "Bulk Power System" and "Bulk Electric System"; it continues to cause confusion in the industry. The definition of “Reliability Standard” to be added to the Glossary applies the standards to the Bulk Power System. The definition of “Reliable Operation” to be added to the Glossary refers to the reliable operation of the Bulk Power System. Once these definitions are added to the Glossary, how and where does NERC propose to limit the applicability of the Reliability Standards and the scope of the term Reliable Operation to the Bulk Electric System?
Response: Thank you for your response, and the terms “Bulk-Power System,” “Reliability Standard,” and “Reliable Operation” will be re-posted with definitions that match the statutory language exactly. Any concerns with the applicability of a specific NERC glossary term in a standard should be addressed with the particular standards drafting team in question. Thus, the scope of how these definitions are applied to a standard will be determined through the Standards Development Process. Further, with the recent release of Order No. 773, FERC has clarified the definition and application of the term BES.		
PPL Corporation NERC Registered Affiliates	Yes	The PPL Companies appreciate the attempt by NERC to comply with FERC directives. However, we do have concerns that the definitions of these terms do not match the statutory definitions in Â§215 of the Federal Power Act. Neither NERC nor FERC may change FERC's statutory powers under Section 215. To create new definitions strictly for the NERC Glossary is confusing and counterproductive. Entities should be able to look to the statute as the ultimate authority, and by creating these new definitions, this is made unclear. Suggested defintions are below.”Bulk Power System” means (A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy. “Reliability Standard” means a requirement, approved by the Commission under this section, to provide for reliable operation of the bulk-power system. The term includes

Organization	Yes or No	Question 1 Comment
		requirements for the operation of existing bulk-power system facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the bulk-power system, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. "Reliable Operation" means operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.
Response: Thank you for your response. The terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
ISO RTO Standards Review Committee	Yes	There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what constitutes Bulk Power System. Use of the term "supply" could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes..
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
JEA	Yes	This seems like scope creep. The original intent was for the reliable operation of the BES. It now appears that the term "BES" is being replaced by the term "BPS" which includes the control systems. Concerns on the individual definitions are as follows: o Bulk Power System: It is confusing to

Organization	Yes or No	Question 1 Comment
		say the definition 'depends on the context' and then to not provide multiple definitions. The "and" used between the two possible definitions should be replaced with an "or". The definition of a Facility is "a set of electrical equipment that operates as a single BES Element" so basically the BPS is the BES plus control systems. The last sentence is redundant since it uses a defined term "Facilities" in the first sentence and then "facilities" a non-defined term in the last sentence when it is clear that they are referencing "Facilities" from the first sentence and that already does not include local distribution. It would be better to delete the last sentence. It is also vague to say "needed to maintain transmission system reliability" when "transmission system reliability" is not defined - a better approach would be to replace "transmission system reliability" with "Reliable Operation of the BES". It also appears confusing to say "any portion thereof" when referencing the transmission network - things are either part of the network or they are not and this may lead to creep in the definition. o Reliability Standard: Requirements are a subset of a Reliability Standard - not the standard itself so the definition should not state "a requirement" but instead something to the effect of "a set of requirements, measures, and severity levels". Also Reliability standards were developed for the reliable operation of the BES and now this is causing scope creep by using the term BPS. BPS should be replaced with BES in all occurrences. The term "including" does not "limit" so the phrase "without limiting the foregoing" is redundant. The last part of the first sentence "to the extent necessary for Reliable Operations of the Bulk Power System" is redundant with the first part "to provide for Reliable Operation of the Bulk Power System" and should therefore be removed. Also the rest of the first sentence "but the term does not include any requirements to enlarge Bulk Power System Facilities or to construct new transmission capacity or generation capacity" should also be removed. The problems with that part are twofold. First, Facilities are defined in reference to the BES not to the BPS and secondly this

Organization	Yes or No	Question 1 Comment
		last part would mean that entities would never have to construct new transmission capacity or generation capacity but the standards are clearly intended to insure an adequate supply to meet load which sometimes necessitates building new generation or transmission lines to meet anticipated growth. o Reliable Operation: The "Bulk Power System" should be replaced with the "Bulk Electric System". By using BPS we will need monitoring equipment on all of our control systems to insure such things as proper voltage. Major systems have this in the form of UPS's but some subcomponents of the control systems may not.
Response: Thank you for your response, and your suggestions were considered. However, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Since the wording matches that of Section 215 of the Federal Power Act, and because FERC directed the modification of the definitions to match the statutory language, the definitions are not being amended further. However, when terms are used in a standard, the standards development process allows for using the Glossary definition or refining how a term is to be defined for a particular standard. Further, with the recent release of Order No. 773, FERC has clarified the definition and application of the term "Bulk Electric System."		
Arizona Public Service Company	Yes	AZPS agrees with the definitions for Bulk Power System and Reliability Standard. However, AZPS does not agree with the the definition of Reliable Operation because this includes a Cyber Security Incident. The scope of the Cyber Security Incident can be unlimited and can take multiple facilities out in a single incident. A cyber incident is beyond a normal operation or state and has further reaching impacts than operating limits, cascading failures, etc. It will be almost impossible or at best difficult to classify any operating condition as "Reliable Operation" under this scenario.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Since the Federal Power Act's definition includes cybersecurity, the NERC Glossary will also include such wording for consistency. However, any concerns with the applicability of a specific NERC Glossary term in a standard should be addressed with the particular		

Organization	Yes or No	Question 1 Comment
standards drafting team in question.		
Luminant	Yes	These statutory definitions should match exactly the definitions of those terms in section 215.
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Turlock Irrigation District	Yes	It is confusing to include a definition of the Bulk Power System (BPS) in Standards where the definition of Bulk Electric System (BES) is used for the standards. These are not synonymous terms or definitions and would create confusion rather than clarity. If BPS is a term that is statutory and added to the Reliablity Standards then BPS and BES should align in definition. BPS makes no reference to voltage threshold whereas the BES definition refers to 100kV and above. Regardless of what the voltage threshold is, there should be alignment in definition if both are to be included in the standards to avoid confusion. Without a threshold, such as voltage level, it is unclear what electric facilities are defined as BPS. It will therefore be unclear as to what electric facilities the NERC Reliability Standards will apply to.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Further, with the recent release of Order No. 773, FERC has clarified the definition and application of the term "Bulk Electric System." Order No. 773 specifically addressed BES voltage thresholds.		
Muscatine Power and Water	Yes	Bulk Power System: MPW believes that to reduce any confusion that it is NERC's intent to not capatilize the word "facilities." Recommend to read, "Bulk Power System means, facilities ..." (lower case f)"Bulk Power System" is defined by Section 215(a) (1) of the Federal Power Act as "facilities...."This is lower case "f" in the Federal Power Act. The NERC definition should be consistent with the lower case "f" used in Section 215(a) of the Federal Power Act.MPW understands that the Commission has directed NERC to

Organization	Yes or No	Question 1 Comment
		include the term "Bulk Power System" in the NERC glossary and this seems to give NERC very little choice but to address FERC's request. However, MPW wishes to make it exceedingly clear that it is inappropriate to use the highly unbounded term "Bulk Power System" in a NERC Reliability Standard as compliance cannot be quantified when using an unbounded term. Therefore, a NERC Standards Drafting Team should not use the unbounded term "Bulk Power System" in a new or revised NERC Standard until "Bulk Power System" is clearly defined, similar to the "bright-line" Bulk Electric System. If "Bulk Power System" should not be used in a NERC Reliability Standard, then the FERC decision to direct NERC to include "Bulk Power System" in the NERC glossary is not without defect and the FERC directive should be rescinded.Reliability Standard: NERC has capatilized the word Facility in this definition. NERC's glossary defines "Facility" as: A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.). With "Facility" capatilized along with Bulk Power System, the industry will equate Bulk Power System directly to Bulk Electric System, 100kV and above. MPW recommends that "Facility" not be capatilized unless it is NERC's intent to have BES and BPS to mean the same. Reliable Operation: No comments, thank you.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. By matching the exact wording in the Federal Power Act, the issue of whether or not certain capitalized terms expand the definition of bulk-power system is avoided. Also, BES and BPS are not intended to be synonymous terms; with the recent release of Order No. 773, FERC has clarified the definition and application of the term "Bulk Electric System." Order No. 773 specifically addresses the voltage threshold for BES facilities.		
Georgia System Operations	Yes	The FERC Directive rests on a misunderstanding of the NERC standards development process. Terms are added to the glossary as they are introduced in the development or revision of a standard; they are not added speculatively in anticipation that they will be used later, or retroactively to

Organization	Yes or No	Question 1 Comment
		modify the meaning of a standard. The FERC directive to add these definitions should be taken as a directive to revise the affected standards using the statutory definitions and at that point add them to the glossary. Using this approach will provide industry the opportunity to focus on how utilizing these definitions might change the meaning of the affected standards. Through the standards development process it might be concluded that the statutory definition can be applied with no adverse consequences, resulting in a trivial revision of the standard (i.e. the addition of the term to the glossary and the capitalizing of the term in the standards). However it is also possible that the SDT and industry will conclude that additional changes to the standard are required to reflect the intended meaning of affected requirements in light of the new definition. Using the standards development process such changes could be made. If this SAR is approved there will be no such flexibility. The new definitions will be added as written with no opportunity for modification to the definitions or to standards that use these terms in the lower case. This would result in confusion about whether these definitions apply to non-capitalized terms that pre-date the definition. It could also lead to unintended consequences of applying a new definition to an existing requirement without a thorough vetting of the impact of the changes.
Response: Thank you for your response. The terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. By matching the exact language in Section 215 of the Federal Power Act, inconsistencies such as the issue of capitalization are eliminated. Any concerns with the use of a specific NERC Glossary term in a standard should be addressed with the particular standards drafting team in question. The Standards Development Process provides for industry approval and each drafting team may tailor specific definitions for terms as they are used in a particular standard. Therefore, if there is a concern that a definition is being altered as it is used in a standard, then that issue should be brought to the attention of the standard drafting team.		
Wisconsin Electric dba We Energies	Yes	The phrase "depending on the context" in the Bulk Power System definition makes the definition subjective. Who decides, when "Bulk Power System" is used, if the NERC Glossary definition applies or not since it depends on the

Organization	Yes or No	Question 1 Comment
		context? In FERC's BES Definition NOPR (docket RM12-6) it is apparent that both FERC and NERC are concerned with inconsistency, subjectivity, and discretion in the application of NERC Glossary definitions. See paragraphs 17, 19, 37, 56, and 72 of that NOPR. The phrase "depending on the context" needs to be removed from the Bulk Power System definition.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Therefore, the phrase "depending on the context" will not appear in the definition for BPS.		
Ma Department of Public Utilities	Yes	1) NERC, as an ERO, is a continent wide reliablity organization and adopting terms that have FPA 215 origins is particularly problematic for Canadian members.2) The term "Reliable Operation" has been changed slightly from the statutory definition provided in the FPA 215 to include the word "supply" to the transmission system which could have far reaching implications and create serious jurisdictional issues (i.e. distribution, cranking paths, etc.). This is contrary to project which was to add the specific definition to the glossary not create a "new" inconsistent one.3) There was general concern over the "quality" of the definitions and many believe they are problematic and create scope issues with the standards and unrealistic reliability objectives.
Response: Thank you for your response, and your viewpoint was considered. However, in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. By matching the statutory language, the concern surrounding the world "supply" is alleviated, and the definitions will then be consistent with the FERC directives found in Order No. 693.		
ReliabilityFirst	Yes	ReliabilityFirst votes in the Affirmative for the three proposed definitions to be added to the NERC Glossary of Terms. ReliabilityFirst agrees that the definitions (approved by the Commission) in the NERC RoP should be consistent with the defined terms in the NERC Glossary of Terms. While ReliabilityFirst votes in the Affirmative, we offer the following comment for

Organization	Yes or No	Question 1 Comment
		consideration:1. The three proposed definitions appear in a number of NERC/FERC approved Standards, though they are not capitalized. Assuming these three definitions are approved and added to the NERC Glossary of Terms, will there be a holistic capitalization of these terms through the suite of NERC/FERC approved standards?
Response: Thank you for your response, and in order to avoid conflict with the Federal Power Act, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Any necessary changes for the Rules of Procedure will need to be made in a separate project. Further, any concerns with the applicability of a specific NERC glossary term in a standard should be addressed with the particular standards drafting team in question; this includes whether or not to use a defined term in any standard. If a standard has not adopted a particular Glossary definition, then the term in not capitalized in the standard.		
El Paso Electric	Yes	EPE votes no on the current proposal for two reasons:First, the proposed definitions do not mirror the statutory language in Section 215 of the Federal Power Act. The deviation EPE finds particularly objectionable is the proposed use of the words "electric energy supply and transmission network" in the definition of "bulk power system" when the statute uses the words "electric energy transmission network." The addition of the words "supply and" in the proposed definition could be read to stretch the scope of the facilities subject to FERC's reliability jurisdiction beyond what Congress intended (and specifically defined) in the statute.Second, there is a need for NERC to address whether the term "bulk power system" is intended to replace the currently-effective term, "bulk electric system." EPE's understanding from discussions in the standards development process is that the "bulk electric system" definition will continue in effect, and be used as a type of subset under the definition of "bulk power system." It is important for voting entities to be informed of the context in which the definition is proposed for effectiveness. We urge NERC to address how the proposed definition of "bulk power system" is intended to be implemented in measuring compliance with the various reliability standards:Specifically: 1) Will the definition of "bulk power system" be used in addition to - or in place

Organization	Yes or No	Question 1 Comment
		of - the definition of “bulk electric system”? 2) If both terms are to be used, will each reliability standard be modified to identify whether it applies to the “bulk power system” or the “bulk electric system”? 3) Will the currently-effective threshold of 100 kV remain in effect, such that all such facilities within the definition of “bulk electric system” will be assumed by NERC and the regional entities to be subsumed within the definition of “bulk power system”? 4) Does NERC envision conducting or directing an assessment of each TO/TP’s transmission assets to delineate which lines (regardless of voltage) fall within the “bulk power system” definition of “necessary for operating an interconnected electric energy transmission network”? EPE urges continuation of the 100 kV threshold. 5) Will NERC exclude from the parameters of “bulk power system” radial transmission lines in the same manner as those lines are excluded from the definition of “bulk electric system” today? EPE would like for any proposed definition to speak directly to the exclusion of radial lines.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms “Bulk-Power System,” “Reliability Standard,” and “Reliable Operation” will be re-posted with definitions that match the statutory language exactly. Also, it must be noted that the BPS term is not synonymous with BES. BES is a subset of BPS, and NERC Reliability Standards generally apply to the BES. Further, with the recent release of Order No. 773, FERC has clarified the definition and application of the term BES.		
Massachusetts Attorney General	Yes	The definition of Reliable Operation is too black and white where it says "will not occur as a result of a sudden disturbance, including a Cyber Security Incident, or unanticipated failure of system Elements". There are limits to redundancy in design, such as n-x where x >= 2, conditions, where such events could occur and the system should not be designed to prevent against such events because the probability is too low and the cost is too high.
Response: Thank you for your response, and the term “Reliable Operation” will be re-posted with a definition that matches the statutory language found in Section 215 of the Federal Power Act.		

Organization	Yes or No	Question 1 Comment
Pinellas County	Yes	The wording of the definition of Bulk Power System says "electric energy from generating facilities". I think the intent is to include the generating facilities as part of the Bulk Power System, not just the energy they generate. This language should be reviewed.
Response: Thank you for your response, and in order to avoid conflicting definitions, the term "Bulk-Power System" will be re-posted with a definition that matches the statutory language found in Section 215 of the Federal Power Act.		
Hydro-Quebec Transenergie	Yes	There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what constitutes Bulk Power System. Use of the term "supply" could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. Also the use of the term ''necessary'' can be leave to different interpretations. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
City of Austin dba Austin Energy	Yes	Austin Energy believes the definitions in the Rules of Procedure ought to exactly match the definitions in the statute. For example, "Facilities" in the definition of "Bulk Power System" should not be capitalized in the RoP because it is not capitalized in the statute.Additionally, you have included an "(i)" in the definition, but omitted "(ii)" and, therefore, people will not know where the distinction is supposed to be for "depending on the context."Additionally, adding "depending on the context" creates ambiguity because context is subjective.Finally, adding the word "supply" has the potential to change the definition.Consequently (and to avoid confusion),

Organization	Yes or No	Question 1 Comment
		Austin Energy recommends using the terms exactly as defined in the statute.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Consolidated Edison Co. of NY, Inc.	Yes	Con Edison supports NPCC's comments.
Response: *See* Response to NPCC		
American Electric Power	Yes	AEP reccomends that whatever changes are accepted in regards to the proposed definitions are also carried over to the ROP and that an effort is made that they be kept in sync with one another.With regard to the definition of "Bulk Power System", we recommend changing the text from "(ii) and electric energy from generating facilities needed" to "(ii) and generating facilities producing the electric energy needed..."With regard to the definition of "Reliability Standard", recommend using another word in place of the lower case "requirement" to avoid confusing it with the defined term "Requirement". In addition, NERC may want to consider including planning and maintenance as part of this definition, going beyond operations only.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Any necessary changes to the Rules of Procedure will be addressed in a separate project.		
Clark Public Utilities	Yes	The definition of Reliability Standard is too long and confusing. I cannot keep up with what the definition is attempting to state in the first long sentence. Why does the definition of Reliability Standard need these references to existing BPS facilities, cyber facilities, and planned facilities? The discussion of existing and planned BPS facilities does not add anything to this

Organization	Yes or No	Question 1 Comment
		definition. Cyber equipment is already included in the definition of Bulk Power System (i.e. control systems) so the mention of cyber is not needed. I suggest the definition be shortened to the following: "Reliability Standard" means a document that provides the minimum requirements necessary to provide for the Reliable Operation of the Bulk Power System. A Reliability Standard shall not be effective in the United States until approved by the Federal Energy Regulatory Commission and shall not be effective in other jurisdictions until made or allowed to become effective by the Applicable Governmental Authority.
Response: Thank you for your response, and in order to avoid confusion, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
HHWP	Yes	The need for a different definitions of BPS and BES remains perplexing. If there is a real difference between these systems, then that should be refereced in the definition. Until the difference between the BPS and BES is clear, no BPS definition, stautory or otherwise is truely meaningful.
Response: Thank you for your response; with the recent release of Order No. 773, FERC has clarified the definition and application of the term BES. BPS is the term to use when generally speaking about the interconnected network or power grid. While the Energy Policy Act grants authority to NERC over the BPS, the NERC Reliability Standards generally apply to the BES. Any concerns with the applicability of a specific NERC glossary term in a standard should be addressed with the particular standards drafting team in question.		
Ingleside Cogeneration LP (affiliate of Occidental Chemical Corporation)	Yes	OEVC would like to see NERC commit to aligning the statutory definitions with those traditionally used in the base of Reliability Standards. The industry has expended a significant amount of effort developing an updated defintion of the Bulk Electric System and an Adequate Level of Reliability - which correspond to Bulk Power System and Reliable Operation respectively. If the terms mean different things depending on the circumstances, then those differences must be addressed. Unfortunately

Organization	Yes or No	Question 1 Comment
		both NERC and FERC have invoked the reliability of the "BPS" in taking actions which are outside of the scope of the in-effect Reliability Standards. Such actions can be perceived as cynical by industry stakeholders and do not instill a sense of shared direction with the regulatory bodies. Similarly, the task force developing the definition of "Adequate Level of Reliability" has not addressed how it is linked to the statutory definition of "Reliable Operation". In OEVC's view, this can actually be an opportunity to weigh the true spirit of partnership by discussing how both governmental authorities and the industry can communicate realistic expectations of BES or BPS reliability to the public. Although it is perfectly valid to expect the industry to invest time and effort into continual reliability improvements, a united understanding on the state of electric system availability would go far to repair fences on all sides. The conversation should rely on the target performance metrics that NERC has been developing for years - a scientific foundation which should remove any ambiguity from the equation.
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Your suggestions are being taken under consideration, and continual open dialogue and collaboration with the industry is encouraged.		
ISO New England	Yes	There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies increase the potential scope of coverage of what constitutes Bulk Power System. Use of the term "supply" could be interpreted to mean facilities beyond the jurisdiction as defined in Section 215 for example distribution, etc. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes. The word "necessary" is also used in the definition. The use of the term ''necessary'' can be left to interpretation. What "Facilities and control systems..." are necessary? For example, a 345kV Phase Angle Regulator might be useful for maintaining transactions, but

Organization	Yes or No	Question 1 Comment
		because of the system configuration does not increase system reliability pre and post contingency. What is meant by "depending on the context"? This implies that there are multiple definitions of "Bulk Power System". Why?
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Idaho Power Co.	Yes	There should be more of an effort to unify the definitions of Bulk Power System and Bulk Electric System. Having both defined terms used in Reliability Standards add to the confusion and incorrect interpretation of the applicability of the standards.
Response: Thank you for your response. With the recent release of Order No. 773, FERC has clarified the definition and application of the term "Bulk Electric System." Bulk-Power System is the term to use when generally speaking about the interconnected network or power grid. While the Energy Policy Act grants authority to NERC over the BPS, the NERC Reliability Standards generally apply to the BES. Therefore, standards may be written to apply to the BES (or portions of the BES) but may also include other elements necessary for the reliable operation of the BPS.		
Texas Reliability Entity	Yes	Texas RE voted "Negative" because in the definition of BPS the text "depending on the context: (i)", which was copied from the RoP definition, is extraneous here because there is no part (ii), and there is no alternative meaning. There is a part (ii) in the RoP definition that NERC removed from the proposed glossary definition. As written, this extraneous language will cause confusion and lead to unneccessary disputes, as it could cause some parties to seek alternative meanings ("depending on the context") where none is intended.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System,"		

Organization	Yes or No	Question 1 Comment
"Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Public Service Enterprise Group	Yes	1. The proposed definition of Bulk Power System differs from the Section 215 definition is several ways.a. The phrase ", depending on the context: (i)" is not in the Section 215 terminology. This phrase was taken from the ROP Appendix 2 definition, which has a second "(ii)" part that is not included in the statutory definition. The phrase ", depending on the context: (i)" is appropriate for the Appendix 2 definition but not the NERC Glossary definition of Bulk Power System and should be deleted.b. Although it is in the Appendix 2 definition, the phrase "an interconnected electric energy supply and transmission network" is an error that is in both the proposed Glossary definition and the Appendix 2 definition because it includes "supply and" which is not in the Section 215 definition. The Section 215 definition has the phrase "an interconnected electric energy transmission network."2. Two proposed definitions - Bulk Power System and Reliability Standard - use the NERC Glossary term "Facilities" which is defined, in the singular "Facility," as "A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.) ." The NERC Glossary definition "Bulk Electric System" is therefore embedded into the "Facility" definition. It is inconsistent and confusing for a statutory definition to include a term that is defined by a Bulk Electric System parameter. For example, the definition of Reliability Standard uses the phrase "Bulk Power System Facilities" which infers that BPS Facilities are comprised of only BES Elements. A similar problem arises in the definition of Bulk Power System - the use of the term "Facilities" infers that the Bulk Power System is limited to BES Elements. We therefore request that "Facilities" be replaced with "facilities" in both definitions.3. Although the proposed statutory definitions for Bulk Power System and Reliability Standard were approved by FERC in the NERC ROP changes that included Appendix 2, we request that NERC petition FERC to correct the

Organization	Yes or No	Question 1 Comment
		similar Appendix 2 definitions that include the errors discussed above.
Response: Thank you for your response, and in order to avoid conflicting definitions between the law and the glossary, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Any necessary changes to Appendix 2 of the Rules of Procedure will be made at a later time through a separate project.		
The united illuminating Company	Yes	NERC has not followed the directive in Order No. 693 to add the "statutory definitions" of the terms proposed to be added to the Glossary. There are differences in the wording of the proposed definitions from the definitions set forth in Section 215. Nerc should consider the implications of using capitalization in the definition especially with the word Facilities. As a capitalized term it will refer back to the NERC Glossary and may not have the same intent as section 215.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. By matching the exact wording in the Federal Power Act, the issue surrounding certain capitalized terms is avoided.		
Turlock Irrigation District	Yes	Without a threshold, such as voltage level, it is unclear what electric facilities are defined as BPS. It will therefore be unclear as to what electric facilities the NERC Reliability Standards will apply to.
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Since the statutory definitions do not include voltage levels for bulk-power system, it will not be included in the glossary. However, FERC has recently clarified in Order No. 773 certain voltage thresholds to be included in the BES. The BES is a subset of the BPS, and the standards generally apply to the BES.		
Ameren	Yes	We understand that as these are statutory definitions and are identical to approved by the Commission, NERC is proposing to make no modifications but following the procedure to include them to the NERC Glossary.

Organization	Yes or No	Question 1 Comment
		However, in case any modifications are pursued, we have the following comments/concerns for considerations:(1)Use of two separate terms Bulk Power System (BPS) and Bulk Electric System (BES) continues to remain confusing and at times appears to be used interchangeably. (2)The definition of "Reliability Standard" states that the term does not include any requirement to enlarge Bulk Power System Facilities or to construct new transmission capacity or generation capacity. But, it seems that the TPL standards or proposals for redundancy require "enlarging" BPS facilities and/or construct new transmission capacity. (3)The definition for "Reliable Operation" implies zero tolerance. We believe that some allowance needs to be made for a low probability of occurrence of system failure in this definition. We suggest inclusion of the following or similar concept:"Reliable Operation" means operating the Elements of the Bulk Power System within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or Cascading failures of such system has an acceptable low probability of occurrence as a result of a sudden disturbance, including a Cyber Security Incident, or unanticipated failure of system Elements.
Response: Thank you for your response, and for clarification, BPS is the term to use when generally speaking about the interconnected network or power grid. BES is the portion of the BPS to which the standards generally apply. Therefore, while the NERC Reliability Standards generally apply to the BES, the Energy Policy Act grants authority to NERC over the BPS. Therefore, standards may be written to apply to the BES (or portions of the BES) but may also include other elements necessary for the reliable operation of the BPS. The terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Any concerns with the applicability of a specific NERC glossary term in a standard should be addressed with the particular standards drafting team in question; therefore, issues with the TPL standard or any other standard should be brought to the attention of that particular drafting team.		
Southwest Power Pool Inc	Yes	Although the reliability standards clearly are mandated by legislative language to apply to all users of the Bulk Power System, the change of the term "electric transmission..." to "electric supply and transmission..." distinctly identifies authority over electric suppliers without restriction. This

Organization	Yes or No	Question 1 Comment
		could be misinterpreted to include authority to order construction and/or expansion of electric supply (generator) facilities. The existing unaltered legislative language along with clarifying language asserting authority over all users of the Bulk Power System is understood and appropriate for fulfilling the legislative mandate.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Tacoma Power	Yes	Tacoma Power appreciates the opportunity to comment on these proposed definitions. We believe the definitions need to be changed to avoid confusion in the standards and their applicability for compliance monitoring and auditing. We suggest changing the proposed definition of "Reliability Standard" by removing Bulk Power System and replacing it with the term Bulk Electric System. The Reliability Standards need to use the Bulk Electric System definition as accepted by the industry, NERC and FERC. Additionally, we suggest changing the proposed definition of "Reliable Operation" by striking the phrase, "... including a Cyber Security Incident, ..." because a Cyber Security Incident is appropriately addressed within the CIPs standards and it is confusing to reference it in this definition.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Therefore, "cybersecurity incident" cannot be removed since it appears in Section 215 of the Federal Power Act. Further, with the recent release of Order No. 773, FERC has clarified the definition and application of the term "Bulk Electric System." BPS is the term to use when generally speaking about the interconnected network or power grid. BES is the portion of the BPS to which the standards generally apply. Therefore, standards may be written to apply to the BES (or portions of the BES) but may also include other elements necessary for the reliable operation of the BPS.		
FEUS	Yes	Comments: FEUS is concerned with the modifications made to the definition of the Bulk Power System (BPS). While the definition proposed here

Organization	Yes or No	Question 1 Comment
		matches the definition included in the NERC Rules of Procedure (ROP), it differs from the definition included in FERC Order 693 and Section 215 of the Energy Policy Act; both of which were fomalized prior to the modification NERC ROP. The proposed definition for BPS now includes 'depending on the context' which is ambiguous and unclear. In addition, 'supply and' was added in the context of (i). FEUS recommends removing the added language in both instances to align the definition with the already established definition in Section 215 and Order 693.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Any necessary changes to the Rules of Procedure will be addressed in a separate project.		
El Paso Electric Company	Yes	First, the proposed definitions do not mirror the statutory language in Section 215 of the Federal Power Act. The deviation EPE finds particularly objectionable is the proposed use of the words "electric energy supply and transmission network" in the definition of "bulk power system" when the statute uses the words "electric energy transmission network." The addition of the words "supply and" in the proposed definition could be read to stretch the scope of the facilities subject to FERC's reliability jurisdiction beyond what Congress intended (and specifically defined) in the statute.Second, there is a need for NERC to address whether the term "bulk power system" is intended to replace the currently-effective term, "bulk electric system." EPE's understanding from discussions in the standards development process is that the "bulk electric system" definition will continue in effect, and be used as a type of subset under the definition of "bulk power system." It is important for voting entities to be informed of the context in which the definition is proposed for effectiveness. We urge NERC to address how the proposed definition of "bulk power system" is intended to be implemented in measuring compliance with the various reliability standards:Specifically: 1) Will the definition of "bulk power

Organization	Yes or No	Question 1 Comment
		system" be used in addition to - or in place of - the definition of "bulk electric system"? 2) If both terms are to be used, will each reliability standard be modified to identify whether it applies to the "bulk power system" or the "bulk electric system"? 3) Will the currently-effective threshold of 100 kV remain in effect, such that all such facilities within the definition of "bulk electric system" will be assumed by NERC and the regional entities to be subsumed within the definition of "bulk power system"? 4) Does NERC envision conducting or directing an assessment of each TO/TP's transmission assets to delineate which lines (regardless of voltage) fall within the "bulk power system" definition of "necessary for operating an interconnected electric energy transmission network"? EPE urges continuation of the 100 kV threshold. 5) Will NERC exclude from the parameters of "bulk power system" radial transmission lines in the same manner as those lines are excluded from the definition of "bulk electric system" today? EPE would like for any proposed definition to speak directly to the exclusion of radial lines.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. In addition, NERC is not replacing the term "Bulk Electric System." With the recent release of Order No. 773, FERC has clarified the definition and application of the term BES. Order No. 773 specifically addresses the voltage threshold, and NERC has petitioned FERC for clarification on certain other facilities that may be included in the BES. However, BPS is the term to use when generally speaking about the interconnected network or power grid. BES is the portion of the BPS to which the standards generally apply, but the standards may also apply to the BPS. Also, any concerns with the applicability of a specific NERC glossary term in a standard should be addressed with the particular standards drafting team in question.		
Brazos Electric Power Cooperative Inc.	Yes	"Facilities" in the definition of "Bulk Power System" should not be capitalized in the RoP because it is not capitalized in the statute.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		

Organization	Yes or No	Question 1 Comment
Any necessary changes in the Rules of Procedure will be addressed through a separate project.		
New York State Dept of Public Svc	Yes	There are inconsistencies with the proposed Glossary of Terms definition of Bulk Power System to the statutory Section 215 definition. The inconsistencies will increase confusion of what constitutes the Bulk Power System. NERC should incorporate the definitions exactly as they appear in the statutory language word for word without capitalization and punctuation changes.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Oklahoma Gas & Electric	Yes	Regarding the proposed NERC Glossary definition for Bulk Power System:1. The proposed wording includes "an interconnected electric energy supply and transmission network" while the Section 215 wording is "an interconnected electric energy and transmission network". It is recommended that the NERC Glossary of Terms definition reflect the wording in 215, or "an interconnected electric energy and transmission network".2. The addition of the phrase "depending on the context" could lead to additional ambiguity.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Exelon Corporation and its affiliates	Yes	Exelon supports and reiterates the comments submitted by EEI.
Response: *See* response to EEI comments		
Consumers Energy	Yes	- It is unclear whether the terms Bulk Electric System and Bulk Power System are meant to be synonymous. Please clarify this.- The word "facilities"

Organization	Yes or No	Question 1 Comment
		should not be capitalized. With Facility capitalized along with Bulk Power System, the industry will
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. This will alleviate concerns regarding the capitalization of certain words. Also, BPS and BES are not synonymous terms. BPS is the term to use when generally speaking about the interconnected network or power grid, and BES is the portion of the BPS to which the standards generally apply. Further, with the recent release of Order No. 773, FERC has clarified the definition and application of the term BES. However, any concerns with the applicability of a specific NERC glossary term in a standard should be addressed with the particular standards drafting team in question.		
South Carolina Electric and Gas	Yes	SCE&G does not agree with the inclusion of the proposed statutory definitions in the NERC Glossary of Terms. While the definition of Bulk Power System is utilized by FERC, it is broader in scope than the currently defined "Bulk Electric System," and; therefore, the proposed statutory definitions "Reliability Standard" and "Reliable Operation" should reference the currently defined "Bulk Electric System" and not "Bulk Power System" or they will potentially change the scope of the NERC Reliability Standards.
Response: Thank you for your response. In order to comply with FERC's directive, "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. BPS is the term to use when generally speaking about the interconnected network or power grid, and BES is the portion of the BPS to which the standards generally apply. Therefore, references to the BES are still appropriate, and the wording is consistent with Section 215 of the Federal Power Act.		
Hydro-Quebec Production	Yes	The NERC proposal implies an interpretation of the context which differs from the section 215 of the Federal Power Act. We believe that this definition could open the door to application of the NERC standards in areas where there are not required for the reliability of interconnected electric systems and for that reason, NERC should incorporate the definitions exactly as they appear in the statutory glossary. NERC should also define the

Organization	Yes or No	Question 1 Comment
		meaning of 'necessary' in the definition in order to eliminate confusion.
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Sacramento Municipal Utility District	Yes	The current language for the proposed definitions is lengthy and unclear. Although we are in support of the definitions we do urge the revision to the definitions that provide a more precise definition. Please find the following suggestions: Bulk Power System-An electrical network consisting of the facilities for control and transmission of electrical energy from generation sources to load centers. Bulk Power Systems do not include facilities used for the local distribution of electric energy. Reliability Standard-A standard used to establish minimum requirements for design, reliable operation, and security for Bulk Power System facilities and for the training of operators of the Bulk Power System. A reliability standard does not require Bulk Power System expansion or the addition of new transmission or generation capacity. A Reliability Standard becomes effective in the United States upon approval by the Federal Regulatory commission and in other jurisdictions as made or allowed by the Applicable Governmental Authority. Reliable Operation-The operation of a Bulk Power System in accordance with Reliability Standards, accepted electric utility practices, and parameters for thermal, voltage, and stability limits to avoid unnecessary separation of system facilities and cascading failures due to a system element failure, instability, or a security problem. Thank you for your consideration.
Response: Thank you for your response, and your proposal was considered. However, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly in order to comply with FERC's directives in Order No. 693.		
Public Utility District No. 2 of Grant County, WA	Yes	The proposed definition of Bulk Power System contained in Project 2012-08 has been modified from the statutory definition contained in the Federal

Organization	Yes or No	Question 1 Comment
		Power Act. As such, the NERC definition of Bulk Power System will not agree with FERC's statutory definition. The addition of "depending on the context" leads to ambiguity in the application of the defined term. Distinguishing between an "interconnected electric energy supply and transmission network" appears to be an expansion of system applicability within the definition. In addition to the concerns listed, has FERC directed NERC to revise the definition of the Bulk Power System? Per Order 693, the ERO has the authority to define the Bulk Electric System, but the Commission has jurisdiction over the definition of Bulk Power System. I see the Order to revise the glossary, but not the statutory definition.
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly.		
Kansas City Power & Light	Yes	KCP&L wishes to adjoin the company and endorse the comments of the Edison Electric Institute.
Response: *See* response to EEI comments		
Georgia Transmission Corporation	Yes	The introduction to the NERC Glossary states "This Glossary lists each term that was defined for use in one or more of NERC's continent-wide or Regional Reliability Standards...". Accordingly, as mentioned in paragraph 1894 listed in the SAR, "the Reliability Standards refer to the bulk electric system, which is also defined in the glossary." Inserting the proposed statutory definitions without modification could have a negative impact and conflicting circular references between the two terms BPS and BES when Reliability Standard only captures the term BPS; which would be inconsistent with the stated purpose of the NERC Glossary identified above. Additionally, GTC has concern there is a potential risk of expanding jurisdictional exposure to Reliability Standards if these terms were approved within the NERC Glossary without modification and subsequently included

Organization	Yes or No	Question 1 Comment
		within the language of a Reliability Standard requirement. Lastly, GTC feels it is important that the industry maintain a primary role in the standards development process and disagrees with the recommendation to waive the requirement for posting for industry comment thus pushing the definitions straight to industry ballot when even the Commission directed the ERO to modify the glossary through the Reliability Standards development process.
Response: Thank you for your response, and in order to comply with FERC's Directive in Order No. 693, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Language that deviated from the statutory language proved to be contentious, and caused further confusion based on comments received. Further, with the recent release of Order No. 773, FERC has clarified the definition and application of the term "Bulk Electric System." By matching the exact wording in the Federal Power Act, the jurisdictional reach of the reliability standards is not expanding. Finally, the standards development team agrees that the industry should maintain a strong primary role in the standards development process, and any exceptions to that process must be approved by the Standards Committee.		
Trans Bay Cable	Yes	Why have a BES and BPS definition? There has not been enough clarity on why NERC wants two definitions. Also, no clarity in regards to the opening context of, "depending on the context" this leaves a lot to intrepretation.
Response: Thank you for your response, and the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. With regard to the two definitions, in Order No. 773, FERC clarified the definition and application of the term BES. However, BPS is the term to use when generally speaking about the interconnected network or power grid; this defines NERC's jurisdiction. BES is the portion of the BPS to which the standards generally apply; BES is a subset of the BPS.		
Public Service Company of New Mexico	Yes	PNM supports the comments filed by EEI.
Response: *See* response to EEI comments		
Pubilic Utility District #2 of Grant County, Washington	Yes	See comments submitted by GCPD Segment 5 ballot member.

Organization	Yes or No	Question 1 Comment
Response: *See* response to Public Utility District No. 2 of Grant County comments.		
Brazos Electric Power Cooperative Inc.	Yes	In the definition of "Bulk Power System" the word "Facilities" should not be capitalized in the RoP because it is not capitalized in the statute. There is included an "(i)" in the proposed definition, but there is no "(ii)" which is confusing. Also the addition of the word "supply" has the potential to change the definition.In the definition of "Reliable Operation" the words "will not occur" should be changed to "should not occur".
Response: Thank you for your response, and in order to avoid conflicting definitions, the terms "Bulk-Power System," "Reliability Standard," and "Reliable Operation" will be re-posted with definitions that match the statutory language exactly. Any necessary changes to Rules of Procedure will be addressed in a separate project.		
New York Power Authority		NYPA supports the comments submitted by the NPCC Regional Standards Committee (RSC).
Response: *See* response to NPCC comments		

END OF REPORT

Implementation Plan
2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Requested Approvals
It is requested that the following definitions be approved for addition to the NERC Glossary of Terms used in Reliability Standards:

- "Bulk-Power System" means, A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

- "Reliability Standard" means a requirement, approved by the Commission under this section, to provide for reliable operation of the bulk-power system. The term includes requirements for the operation of existing bulk-power system facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the bulk-power system, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.

- "Reliable Operation" means operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.

These definitions will apply to terms that are currently capitalized in any Reliability Standard. Where a Reliability Standard includes a non-capitalized term, capitalization will be considered during the next standards development project involving the requirement.

Requested Retirements
No Reliability Standards or definitions are requested to be retired with the approval of the addition of the definitions for Bulk-Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards.

Prerequisite Approvals
No Reliability Standard or definition is under development that must be completed or implemented before the definitions for Bulk-Power System, Reliability Standard, and Reliable Operation can be added to the NERC Glossary of Terms used in Reliability Standards.

Background

In Paragraph 1894 of the Federal Energy Regulatory Commission (FERC) Order 693, the Commission directed the Electric Reliability Organization to include the statutory definitions of Bulk-Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards:

> "1894. The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

The statutory definitions for Bulk-Power System, Reliability Standard, and Reliable Operation are contained in Section 215 of the Federal Power Act (16 U.S.C. § 824o). Inclusion of the statutory definitions for Bulk-Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms will address three outstanding Commission directives.

Effective Date

The definitions of Bulk-Power System, Reliability Standard, and Reliable Operation shall be added to the NERC Glossary of Terms used in Reliability Standards effective upon applicable regulatory approval.

Implementation Plan
2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Requested Approvals

It is requested that the following definitions be approved for addition to the NERC Glossary of Terms used in Reliability Standards:

- "Bulk~~-~~ Power System" means, ~~depending on the context: (i) Facilities~~ A) facilities and control systems necessary for operating an interconnected electric energy ~~supply and~~ transmission network (or any portion thereof~~),~~); and (B) electric energy from ~~generating~~generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

- "Reliability Standard" means a requirement, approved by the Commission under this section, to provide for ~~Reliable Operation~~reliable operation of the ~~Bulk Power System, including without limiting the foregoing,~~bulk-power system. The term includes requirements for the operation of existing ~~Bulk Power System Facilities~~bulk-power system facilities, including ~~cyber security~~cybersecurity protection, and ~~including~~ the design of planned additions or modifications to such ~~Facilities~~facilities to the extent necessary to provide for ~~Reliable Operation~~reliable operation of the ~~Bulk Power System~~bulk-power system, but the term does not include any requirement to enlarge ~~Bulk Power System Facilities~~such facilities or to construct new transmission capacity or generation capacity. ~~A Reliability Standard shall not be effective in the United States until approved by the Federal Energy Regulatory Commission and shall not be effective in other jurisdictions until made or allowed to become effective by the Applicable Governmental Authority.~~

- "Reliable Operation" means operating the ~~Elements~~elements of the ~~Bulk Power System~~bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or ~~Cascading~~cascading failures of such system will not occur as a result of a sudden disturbance, including a ~~Cyber Security Incident~~cybersecurity incident, or unanticipated failure of system ~~Elements~~elements.

These definitions will apply to terms that are currently capitalized in any Reliability Standard. Where a Reliability Standard includes a non-capitalized term, capitalization will be considered during the next standards development project involving the requirement.

Requested Retirements

No Reliability Standards or definitions are requested to be retired with the approval of the addition of the definitions for Bulk-Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards.

Prerequisite Approvals

No Reliability Standard or definition is under development that must be completed or implemented before the definitions for Bulk-Power System, Reliability Standard, and Reliable Operation can be added to the NERC Glossary of Terms used in Reliability Standards.

Background

In Paragraph 1894 of the Federal Energy Regulatory Commission (FERC) Order 693, the Commission directed the Electric Reliability Organization to include the statutory definitions of Bulk-Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards:

> "1894. The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

The statutory definitions for Bulk-Power System, Reliability Standard, and Reliable Operation are contained in Section 215 of the ~~Electricity Modernization~~ Federal Power Act ~~of 2005.~~(16 U.S.C. § 824o). Inclusion of the statutory definitions for Bulk-Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms ~~used in Reliability Standards~~ will address three outstanding Commission directives.

~~The statutory definitions for Bulk Power System, Reliability Standard, and Reliable Operation contained in the Electricity Modernization Act of 2005 were previously submitted by NERC in a petition to FERC, dated November 29, 2011. The petition requested approval of numerous revisions to NERC's Rules of Procedure (ROP); including, but not limited to, a new Appendix 2 to the ROP, *Definitions Used in the Rules of Procedure*. On January 31, 2012, the Commission issued an Order approving NERC's November 29, 2011, request.~~

~~The proposed definitions for Bulk Power System, Reliability Standard, and Reliable Operation are identical to the definitions approved by the Commission in their January 31, 2012 Order and are responsive to the Commission's directives from Paragraph 1894 of Order 693. Approval of the proposed definitions for Bulk Power System, Reliability Standard, and Reliable Operation also ensures both the NERC Glossary of Terms used in Reliability Standards and the NERC ROP contain consistent (identical) definitions for these terms.~~

Effective Date

The definitions of Bulk Power System, Reliability Standard, and Reliable Operation shall be added to the NERC Glossary of Terms used in Reliability Standards effective upon applicable regulatory approval.

Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

Development Steps Completed

1. On May 10, 2012, the Standards Committee (SC) authorized NERC posting a Standard Authorization Request (SAR) for adding the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms for a 45-day comment period. The SAR was the actual document posted for the formal comment and initial ballot period.
2. Phase 1 Glossary Updates were posted for a 45-day formal comment period and initial ballot from June 19, 2012 through August 2, 2012. Stakeholders were asked to provide feedback on the Glossary Updates and associated documents through an electronic comment form. There were 60 sets of comments, including comments from approximately 159 different people from approximately 104 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.
3. The initial ballot was conducted during the final 10 days of the formal comment period, from July 24, 2012 to August 2, 2012. The initial ballot was unsuccessful. A quorum was reached at 83.11% participation from the 373 registered entities in the ballot pool. The weighted segment vote for the definitions was only 54.16%. Based on the comments received, the proposed definitions were amended to match the statutory language found in Section 215 of the Federal Power Act.

Description of Current Draft

This is the second posting and ballot for adding the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms. The statutory definitions will be posted for a 30-day formal comment period, with a successive ballot during the final 10 days of that comment period.

Anticipated Actions	Anticipated Date
30-day Formal Comment Period with Parallel Successive Ballot	February-March 2013
Recirculation Ballot	April 2013
BOT adoption	May 2013

Effective Dates

The definitions of Bulk Power System, Reliability Standard, and Reliable Operation shall be added to the NERC Glossary of Terms used in Reliability Standards effective upon applicable regulatory approval.

Version History

Version	Date	Action	Change Tracking
N/A	TBD	Addition of the definitions of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards.	N/A

Definitions of Terms Used in Standard

This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.

"Bulk-Power System" means, A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

"Reliability Standard" means a requirement, approved by the Commission under this section, to provide for reliable operation of the bulk-power system. The term includes requirements for the operation of existing bulk-power system facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the bulk-power system, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.

"Reliable Operation" means operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a

sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.

Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

Development Steps Completed

1. ~~The~~On May 10, 2012, the Standards Committee (SC) authorized NERC posting a Standard Authorization Request (SAR) for adding the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms ~~used in Reliability Standards~~ for a 45-day comment period. The SAR was the actual document posted for the formal comment ~~period, with an~~and initial ballot ~~during the final 10 days of that comment~~ period~~. Standards Committee authorization occurred during the May 10, 2012 SC meeting~~.
2. Phase 1 Glossary Updates were posted for a 45-day formal comment period and initial ballot from June 19, 2012 through August 2, 2012. Stakeholders were asked to provide feedback on the Glossary Updates and associated documents through an electronic comment form. There were 60 sets of comments, including comments from approximately 159 different people from approximately 104 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.
3. The initial ballot was conducted during the final 10 days of the formal comment period, from July 24, 2012 to August 2, 2012. The initial ballot was unsuccessful. A quorum was reached at 83.11% participation from the 373 registered entities in the ballot pool. The weighted segment vote for the definitions was only 54.16%. Based on the comments received, the proposed definitions were amended to match the statutory language found in Section 215 of the Federal Power Act.

Description of Current Draft

This is the ~~initial~~second posting and ballot for adding the statutory definitions ~~(without modification)~~ of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms~~ used in Reliability Standards~~. The statutory definitions will be posted for a ~~45~~30-day formal comment period, with ~~an initial~~a successive ballot during the final 10 days of that comment period.

Anticipated Actions	Anticipated Date
~~45~~30-day Formal Comment Period with Parallel ~~Initial~~Successive Ballot	~~June 2012~~February-March 2013
Recirculation ~~ballot~~Ballot	~~September~~

	~~2012~~April 2013
BOT adoption	~~November 2012~~May 2013

Effective Dates

The definitions of Bulk Power System, Reliability Standard, and Reliable Operation shall be added to the NERC Glossary of Terms used in Reliability Standards effective upon applicable regulatory approval.

Version History

Version	Date	Action	Change Tracking
~~1~~N/A	TBD	Addition of the definitions of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards.	N/A

Definitions of Terms Used in Standard

This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.

"Bulk ~~-~~Power System" means, ~~depending on the context: (i) Facilities~~ A) facilities and control systems necessary for operating an interconnected electric energy ~~supply and~~ transmission network (or any portion thereof~~),~~); and (B) electric energy from ~~generating~~generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

"Reliability Standard" means a requirement, approved by the Commission under this section, to provide for ~~Reliable Operation of the Bulk Power System, including without limiting~~ reliable operation of the ~~foregoing,~~bulk-power system. The term includes requirements for the operation of existing ~~Bulk Power System Facilities~~bulk-power system

facilities, including ~~cyber security~~cybersecurity protection, and ~~including~~ the design of planned additions or modifications to such ~~Facilities~~facilities to the extent necessary to provide for ~~Reliable Operation~~reliable operation of the ~~Bulk Power System~~bulk-power system, but the term does not include any requirement to enlarge ~~Bulk Power System Facilities~~such facilities or to construct new transmission capacity or generation capacity. ~~A Reliability Standard shall not be effective in the United States until approved by the Federal Energy Regulatory Commission and shall not be effective in other jurisdictions until made or allowed to become effective by the Applicable Governmental Authority.~~

"Reliable Operation" means operating the ~~Elements~~elements of the ~~Bulk Power System~~bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or ~~Cascading~~cascading failures of such system will not occur as a result of a sudden disturbance, including a ~~Cyber Security Incident~~cybersecurity incident, or unanticipated failure of system ~~Elements.~~elements.

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Unofficial Comment Form
Project 2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Please **DO NOT** use this form for submitting comments. Please use the electronic form to submit comments on the Standard. The electronic comment form must be completed by 8 p.m. ET **March 22, 2013**.

If you have questions please contact Soo Jin Kim at Soo.Jin.Kim@nerc.net or by telephone at 404-446-9742.

Project 2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Background Information

This posting is in response to an initial ballot and formal comment period. This posting is soliciting response to definitions that now match the statutory language verbatim. In Paragraph 1894 of the Federal Energy Regulatory Commission (FERC) Order 693, the Commission directed the Electric Reliability Organization to include the statutory definitions of Bulk-Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards:

> "1894. The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

Inclusion of the statutory definitions for Bulk- Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards will address three outstanding Commission directives. The proposed definitions for Bulk-Power System, Reliability Standard, and Reliable Operation are identical to the definitions found in Section 215 of the Federal Power Act.

The following definitions are proposed to be added to the NERC Glossary of Terms used in Reliability Standards in order to comply with the FERC directives in Paragraph 1894 of Order 693:

- **"Bulk-Power System"** means, A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

- **"Reliability Standard"** means a requirement, approved by the Commission under this section, to provide for reliable operation of the bulk-power system. The term includes requirements for the operation of existing bulk-power system facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the bulk-power system, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.
- **"Reliable Operation"** means operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.

As the proposed definitions for Bulk-Power System, Reliable Operation, and Reliability Standard are the statutory definitions for these terms contained in Section 215 of the Federal Power Act. NERC is proposing to make no modifications to the statutory definitions. The outstanding FERC directive requires..."the ERO to modify the glossary through the Reliability Standards development process."

On May 10, 2012, the Standards Committee (SC) authorized posting the Standard Authorization Request (SAR) for adding the statutory definitions of Bulk-Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards for a 45-day formal comment period and initial ballot with the ballot open during the final 10 days of that comment period. The current posting details new proposed definitions that are in response to industry comments from that initial comment period and ballot, which occurred from June 19, 2012 through August 2, 2012.

Enter All Comments in Simple Text Format. Bullets, numbers, and special formatting will not be retained.

Do you have any comments regarding the inclusion of the statutory definitions for Bulk-Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms?

☐ Yes
☐ No
Comments:

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Standards Announcement

Project 2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Successive Ballot is now open through 8 p.m. Friday, March 22, 2013

Now Available

A successive ballot for Phase 1 of the Glossary Updates for Statutory Definitions is open through **8 p.m. Eastern on Friday, March 22, 2013**.

Background information for this project can be found on the project page.

Instructions

Members of the ballot pools associated with this project may log in and submit their vote for the Glossary Updates for Statutory Definitions by clicking here.

Next Steps

The ballot results will be announced and posted on the project page. The drafting team will consider all comments received during the formal comment period and, if needed, make revisions to the Glossary Updates for Statutory Definitions. If the comments do not show the need for significant revisions, the Glossary Updates for Statutory Definitions will proceed to a recirculation ballot.

Standards Development Process

The Standards 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, Reliability Standards Analyst, at monica.benson@nerc.net or at 404-446-2560.

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Standards Announcement

Project 2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Formal Comment Period Open: February 21, 2013 – March 22, 2013

Upcoming:
Successive Ballot: March 13, 2013 – March 22, 2013

Now Available

A 30-day formal comment period for Phase 1 of the Glossary Updates for Statutory Definitions is open through **8 p.m. Eastern on Friday, March 22, 2013**.

Instructions for Commenting

Please use this electronic form to submit comments. If you experience any difficulties in using the electronic form, please contact Wendy Muller at wendy.muller@nerc.net. An off-line, unofficial copy of the comment form is posted on the project page.

Before the ballot begins, members of the ballot pool may communicate with one another by using the "ballot pool list server." (Once the balloting begins, ballot pool members are prohibited from using the ballot pool list server.) The ballot pool list server for the ballot pool is bp-2012-08.1_GlossarySB_in@nerc.com.

Next Steps

A successive ballot of Phase 1 of the Glossary Updates for Statutory Definitions will be conducted beginning on Wednesday, March 13, 2013 through 8 p.m. Eastern on Friday, March 22, 2013.

Background

This posting is in response to an initial ballot and formal comment period. This posting is soliciting a response to definitions that now match the statutory language verbatim. In paragraph 1894 of Federal Energy Regulatory Commission (FERC) Order 693, the Commission directed the Electric Reliability Organization to include the statutory definitions of the Bulk Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards:

> "1894. The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to

include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

Inclusion of the statutory definitions for Bulk- Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards will address these outstanding Commission directives. The proposed definitions for Bulk-Power System, Reliability Standard, and Reliable Operation are identical to the definitions found in Section 215 of the Federal Power Act.

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Project 2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

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Upcoming:
Successive Ballot: March 13, 2013 – March 22, 2013

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Next Steps

A successive ballot of Phase 1 of the Glossary Updates for Statutory Definitions will be conducted beginning on Wednesday, March 13, 2013 through 8 p.m. Eastern on Friday, March 22, 2013.

Background

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include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

Inclusion of the statutory definitions for Bulk- Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards will address these outstanding Commission directives. The proposed definitions for Bulk-Power System, Reliability Standard, and Reliable Operation are identical to the definitions found in Section 215 of the Federal Power Act.

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Standards Announcement

Project 2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Successive Ballot Results

Now Available

A successive ballot for Phase 1 of the Glossary Updates for Statutory Definitions concluded at **8 p.m. Eastern on Friday, March 22, 2013**.

Voting statistics are listed below, and the Ballot Results page provides a link to the detailed results for the successive ballot.

Approval
Quorum: 77.48% Approval: 84.27%

Background information for this project can be found on the project page.

Next Steps

The drafting team will consider all comments received during the formal comment period and, if needed, make revisions to the Glossary Updates for Statutory Definitions. If the comments do not show the need for significant revisions, the Glossary Updates for Statutory Definitions will proceed to a recirculation ballot.

Standards Development Process

The Standards 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 Wendy Muller, Standards Development Administrator, at wendy.muller@nerc.net or at 404-446-2560.

North American Electric Reliability Corporation
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Atlanta, GA 30326
404-446-2560 | www.nerc.com

Ballot Results	
Ballot Name:	Project 2012-08.1 Phase 1 Glossary Updates February 2013_in
Ballot Period:	3/13/2013 - 3/22/2013
Ballot Type:	Initial
Total # Votes:	289
Total Ballot Pool:	373
Quorum:	**77.48 % The Quorum has been reached**
Weighted Segment Vote:	84.27 %
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.	101	1	61	0.871	9	0.129	6	25
2 - Segment 2.	9	0.7	5	0.5	2	0.2	0	2
3 - Segment 3.	82	1	55	0.873	8	0.127	4	15
4 - Segment 4.	29	1	19	0.864	3	0.136	0	7
5 - Segment 5.	79	1	50	0.862	8	0.138	6	15
6 - Segment 6.	55	1	33	0.892	4	0.108	4	14
7 - Segment 7.	0	0	0	0	0	0	0	0
8 - Segment 8.	8	0.3	2	0.2	1	0.1	0	5
9 - Segment 9.	2	0.1	0	0	1	0.1	0	1
10 - Segment 10.	8	0.5	5	0.5	0	0	3	0
Totals	**373**	**6.6**	**230**	**5.562**	**36**	**1.038**	**23**	**84**

Individual Ballot Pool Results

Segment	Organization	Member	Ballot	Comments
1	Ameren Services	Kirit Shah	Affirmative	
1	American Electric Power	paul B johnson	Negative	
1	American Transmission Company, LLC	Andrew Z Pusztai	Affirmative	
1	Arizona Public Service Co.	Robert Smith	Negative	
1	Associated Electric Cooperative, Inc.	John Bussman	Affirmative	
1	Austin Energy	James Armke	Affirmative	
1	Avista Corp.	Scott J Kinney		
1	Balancing Authority of Northern California	Kevin Smith	Affirmative	

1	BC Hydro and Power Authority	Patricia Robertson	Abstain	000191
1	Beaches Energy Services	Joseph S Stonecipher		
1	Bonneville Power Administration	Donald S. Watkins	Affirmative	
1	Brazos Electric Power Cooperative, Inc.	Tony Kroskey		
1	Bryan Texas Utilities	John C Fontenot	Affirmative	
1	CenterPoint Energy Houston Electric, LLC	John Brockhan	Affirmative	
1	Central Maine Power Company	Joseph Turano Jr.	Affirmative	
1	City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	Chang G Choi	Affirmative	
1	Clark Public Utilities	Jack Stamper	Affirmative	
1	Cleco Power LLC	Danny McDaniel	Affirmative	
1	Colorado Springs Utilities	Paul Morland	Affirmative	
1	Consolidated Edison Co. of New York	Christopher L de Graffenried	Affirmative	
1	CPS Energy	Richard Castrejana		
1	Dairyland Power Coop.	Robert W. Roddy	Abstain	
1	Dayton Power & Light Co.	Hertzel Shamash		
1	Dominion Virginia Power	Michael S Crowley	Affirmative	
1	Duke Energy Carolina	Douglas E. Hils	Affirmative	
1	El Paso Electric Company	Dennis Malone	Affirmative	
1	Empire District Electric Co.	Ralph F Meyer		
1	Entergy Services, Inc.	Edward J Davis		
1	FirstEnergy Corp.	William J Smith	Affirmative	
1	Florida Keys Electric Cooperative Assoc.	Dennis Minton		
1	Florida Power & Light Co.	Mike O'Neil	Affirmative	
1	Gainesville Regional Utilities	Richard Bachmeier		
1	Georgia Transmission Corporation	Jason Snodgrass	Negative	
1	Great River Energy	Gordon Pietsch	Affirmative	
1	Hoosier Energy Rural Electric Cooperative, Inc.	Bob Solomon		
1	Hydro One Networks, Inc.	Ajay Garg	Negative	
1	Hydro-Quebec TransEnergie	Bernard Pelletier	Negative	
1	Idaho Power Company	Molly Devine	Affirmative	
1	Imperial Irrigation District	Tino Zaragoza		
1	International Transmission Company Holdings Corp	Michael Moltane	Affirmative	
1	JEA	Ted Hobson		
1	KAMO Electric Cooperative	Walter Kenyon		
1	Kansas City Power & Light Co.	Michael Gammon	Affirmative	
1	Lakeland Electric	Larry E Watt	Affirmative	
1	Lee County Electric Cooperative	John W Delucca		
1	LG&E Energy Transmission Services	Bradley C. Young		
1	Lincoln Electric System	Doug Bantam	Affirmative	
1	Long Island Power Authority	Robert Ganley	Negative	
1	Lower Colorado River Authority	Martyn Turner	Affirmative	
1	Manitoba Hydro	Joe D Petaski	Abstain	
1	MEAG Power	Danny Dees	Affirmative	
1	MidAmerican Energy Co.	Terry Harbour	Affirmative	
1	Muscatine Power & Water	Andrew J Kurriger		
1	National Grid USA	Michael Jones	Affirmative	
1	Nebraska Public Power District	Cole C Brodine		
1	New York Power Authority	Bruce Metruck	Affirmative	
1	New York State Electric & Gas Corp.	Raymond P Kinney		
1	Northeast Utilities	David Boguslawski	Affirmative	
1	NorthWestern Energy	John Canavan	Affirmative	
1	NStar Gas and Electric	John Robertson		
1	Ohio Valley Electric Corp.	Robert Mattey	Negative	
1	Oklahoma Gas and Electric Co.	Marvin E VanBebber	Abstain	
1	Omaha Public Power District	Doug Peterchuck	Affirmative	
1	Oncor Electric Delivery	Jen Fiegel	Affirmative	
1	Orlando Utilities Commission	Brad Chase	Affirmative	
1	Pacific Gas and Electric Company	Bangalore Vijayraghavan		
1	PacifiCorp	Ryan Millard	Affirmative	
1	PECO Energy	Ronald Schloendorn	Affirmative	
1	Platte River Power Authority	John C. Collins	Affirmative	
1	Portland General Electric Co.	John T Walker	Affirmative	
1	Potomac Electric Power Co.	David Thorne	Affirmative	
1	PowerSouth Energy Cooperative	Larry D Avery	Affirmative	
1	PPL Electric Utilities Corp.	Brenda L Truhe	Affirmative	

1	Progress Energy Carolinas	Brett A. Koelsch		
1	Public Service Company of New Mexico	Laurie Williams	Abstain	
1	Public Service Electric and Gas Co.	Kenneth D. Brown	Affirmative	
1	Public Utility District No. 1 of Okanogan County	Dale Dunckel		
1	Public Utility District No. 2 of Grant County, Washington	Rod Noteboom		
1	Puget Sound Energy, Inc.	Denise M Lietz	Abstain	
1	Rochester Gas and Electric Corp.	John C. Allen	Affirmative	
1	Sacramento Municipal Utility District	Tim Kelley	Affirmative	
1	Salt River Project	Robert Kondziolka	Affirmative	
1	Santee Cooper	Terry L Blackwell	Negative	
1	Seattle City Light	Pawel Krupa	Affirmative	
1	Sierra Pacific Power Co.	Rich Salgo	Negative	
1	Snohomish County PUD No. 1	Long T Duong	Affirmative	
1	South California Edison Company	Steven Mavis	Affirmative	
1	Southern Company Services, Inc.	Robert A. Schaffeld	Affirmative	
1	Southern Illinois Power Coop.	William Hutchison	Affirmative	
1	Southwest Transmission Cooperative, Inc.	John Shaver	Affirmative	
1	Sunflower Electric Power Corporation	Noman Lee Williams	Affirmative	
1	Tennessee Valley Authority	Howell D Scott	Affirmative	
1	Trans Bay Cable LLC	Steven Powell	Affirmative	
1	Tri-State G & T Association, Inc.	Tracy Sliman	Affirmative	
1	Tucson Electric Power Co.	John Tolo	Affirmative	
1	Turlock Irrigation District	Esteban Martinez	Affirmative	
1	United Illuminating Co.	Jonathan Appelbaum	Affirmative	
1	Westar Energy	Allen Klassen	Affirmative	
1	Western Area Power Administration	Brandy A Dunn	Affirmative	
1	Western Farmers Electric Coop.	Forrest Brock		
1	Xcel Energy, Inc.	Gregory L Pieper		
2	BC Hydro	Venkataramakrishnan Vinnakota		
2	Electric Reliability Council of Texas, Inc.	Cheryl Moseley	Affirmative	
2	Independent Electricity System Operator	Barbara Constantinescu	Negative	
2	ISO New England, Inc.	Kathleen Goodman	Affirmative	
2	Midwest ISO, Inc.	Marie Knox	Affirmative	
2	New Brunswick System Operator	Alden Briggs	Negative	
2	New York Independent System Operator	Gregory Campoli		
2	PJM Interconnection, L.L.C.	stephanie monzon	Affirmative	
2	Southwest Power Pool, Inc.	Charles H. Yeung	Affirmative	
3	AEP	Michael E Deloach	Negative	
3	Alabama Power Company	Richard J. Mandes	Affirmative	
3	Ameren Services	Mark Peters	Affirmative	
3	APS	Steven Norris	Negative	
3	Atlantic City Electric Company	NICOLE BUCKMAN	Affirmative	
3	Avista Corp.	Robert Lafferty		
3	BC Hydro and Power Authority	Pat G. Harrington	Abstain	
3	Bonneville Power Administration	Rebecca Berdahl	Affirmative	
3	Central Electric Power Cooperative	Adam M Weber	Affirmative	
3	Central Lincoln PUD	Steve Alexanderson	Affirmative	
3	City of Austin dba Austin Energy	Andrew Gallo	Affirmative	
3	City of Bartow, Florida	Matt Culverhouse	Affirmative	
3	City of Farmington	Linda R Jacobson		
3	City of Green Cove Springs	Gregg R Griffin		
3	City of Redding	Bill Hughes	Affirmative	
3	Cleco Corporation	Michelle A Corley	Affirmative	
3	Colorado Springs Utilities	Charles Morgan	Affirmative	
3	ComEd	Bruce Krawczyk	Affirmative	
3	Consolidated Edison Co. of New York	Peter T Yost	Affirmative	
3	Consumers Energy	Richard Blumenstock	Affirmative	
3	CPS Energy	Jose Escamilla		
3	Delmarva Power & Light Co.	Michael R. Mayer	Affirmative	
3	Detroit Edison Company	Kent Kujala	Affirmative	
3	Dominion Resources, Inc.	Connie B Lowe	Affirmative	
3	Duke Energy Carolina	Henry Ernst-Jr		
3	El Paso Electric Company	Tracy Van Slyke	Affirmative	
3	Entergy	Joel T Plessinger	Affirmative	
3	FirstEnergy Energy Delivery	Stephan Kern	Affirmative	

3	Flathead Electric Cooperative	John M Goroski		
3	Florida Municipal Power Agency	Joe McKinney	Affirmative	
3	Florida Power Corporation	Lee Schuster	Affirmative	
3	Georgia Power Company	Danny Lindsey	Affirmative	
3	Georgia System Operations Corporation	Scott McGough	Negative	
3	Great River Energy	Brian Glover	Affirmative	
3	Gulf Power Company	Paul C Caldwell	Affirmative	
3	Hydro One Networks, Inc.	David Kiguel	Negative	
3	Imperial Irrigation District	Jesus S. Alcaraz		
3	JEA	Garry Baker	Affirmative	
3	Kansas City Power & Light Co.	Charles Locke	Affirmative	
3	Kissimmee Utility Authority	Gregory D Woessner	Affirmative	
3	Lakeland Electric	Mace D Hunter	Affirmative	
3	Lincoln Electric System	Jason Fortik	Affirmative	
3	Los Angeles Department of Water & Power	Daniel D Kurowski		
3	Louisville Gas and Electric Co.	Charles A. Freibert	Affirmative	
3	Manitoba Hydro	Greg C. Parent	Abstain	
3	MidAmerican Energy Co.	Thomas C. Mielnik	Affirmative	
3	Mississippi Power	Jeff Franklin	Affirmative	
3	Modesto Irrigation District	Jack W Savage		
3	Municipal Electric Authority of Georgia	Steven M. Jackson	Affirmative	
3	Muscatine Power & Water	John S Bos	Affirmative	
3	Nebraska Public Power District	Tony Eddleman	Affirmative	
3	New York Power Authority	David R Rivera	Affirmative	
3	Niagara Mohawk (National Grid Company)	Michael Schiavone		
3	Northern Indiana Public Service Co.	William SeDoris	Affirmative	
3	Oklahoma Gas and Electric Co.	Gary Clear		
3	Omaha Public Power District	Blaine R. Dinwiddie	Affirmative	
3	Orange and Rockland Utilities, Inc.	David Burke	Affirmative	
3	Orlando Utilities Commission	Ballard K Mutters	Affirmative	
3	Owensboro Municipal Utilities	Thomas T Lyons	Negative	
3	Pacific Gas and Electric Company	John H Hagen	Affirmative	
3	PacifiCorp	Dan Zollner	Affirmative	
3	Pepco Holdings, Inc.	Mark R Jones	Affirmative	
3	Platte River Power Authority	Terry L Baker	Affirmative	
3	PNM Resources	Michael Mertz		
3	Progress Energy Carolinas	Sam Waters		
3	Public Service Electric and Gas Co.	Jeffrey Mueller	Affirmative	
3	Puget Sound Energy, Inc.	Erin Apperson	Abstain	
3	Rutherford EMC	Thomas M Haire		
3	Sacramento Municipal Utility District	James Leigh-Kendall	Affirmative	
3	Salt River Project	John T. Underhill	Affirmative	
3	Santee Cooper	James M Poston	Negative	
3	Seattle City Light	Dana Wheelock	Affirmative	
3	Seminole Electric Cooperative, Inc.	James R Frauen	Negative	
3	Snohomish County PUD No. 1	Mark Oens	Affirmative	
3	South Carolina Electric & Gas Co.	Hubert C Young	Abstain	
3	Tacoma Public Utilities	Travis Metcalfe	Affirmative	
3	Tampa Electric Co.	Ronald L. Donahey		
3	Tennessee Valley Authority	Ian S Grant	Affirmative	
3	Tri-County Electric Cooperative, Inc.	Mike Swearingen	Negative	
3	Tri-State G & T Association, Inc.	Janelle Marriott	Affirmative	
3	Westar Energy	Bo Jones	Affirmative	
3	Xcel Energy, Inc.	Michael Ibold	Affirmative	
4	American Municipal Power	Kevin Koloini		
4	Blue Ridge Power Agency	Duane S Dahlquist	Affirmative	
4	City of Austin dba Austin Energy	Reza Ebrahimian	Affirmative	
4	City of New Smyrna Beach Utilities Commission	Tim Beyrle		
4	City of Redding	Nicholas Zettel	Affirmative	
4	City Utilities of Springfield, Missouri	John Allen	Affirmative	
4	Consumers Energy	David Frank Ronk		
4	Detroit Edison Company	Daniel Herring		
4	Flathead Electric Cooperative	Russ Schneider	Affirmative	
4	Florida Municipal Power Agency	Frank Gaffney	Affirmative	
4	Fort Pierce Utilities Authority	Cairo Vanegas		
4	Georgia System Operations Corporation	Guy Andrews	Negative	

4	Illinois Municipal Electric Agency	Bob C. Thomas	Affirmative	
4	LaGen	Richard Comeaux		
4	Madison Gas and Electric Co.	Joseph DePoorter	Affirmative	
4	Modesto Irrigation District	Spencer Tacke	Negative	
4	North Carolina Eastern Municipal Power Agency	Cecil Rhodes	Affirmative	
4	Ohio Edison Company	Douglas Hohlbaugh	Affirmative	
4	Oklahoma Municipal Power Authority	Ashley Stringer	Affirmative	
4	Old Dominion Electric Coop.	Mark Ringhausen	Affirmative	
4	Public Utility District No. 1 of Douglas County	Henry E. LuBean	Affirmative	
4	Public Utility District No. 1 of Snohomish County	John D Martinsen	Affirmative	
4	Sacramento Municipal Utility District	Mike Ramirez	Affirmative	
4	Seattle City Light	Hao Li	Affirmative	
4	Seminole Electric Cooperative, Inc.	Steven R Wallace	Negative	
4	Tacoma Public Utilities	Keith Morisette	Affirmative	
4	Turlock Irrigation District	Steven C Hill		
4	Wisconsin Energy Corp.	Anthony Jankowski	Affirmative	
4	WPPI Energy	Todd Komplin	Affirmative	
5	AEP Service Corp.	Brock Ondayko	Negative	
5	Amerenue	Sam Dwyer	Affirmative	
5	Arizona Public Service Co.	Edward Cambridge	Negative	
5	Avista Corp.	Edward F. Groce		
5	BC Hydro and Power Authority	Clement Ma	Abstain	
5	Boise-Kuna Irrigation District/dba Lucky peak power plant project	Mike D Kukla	Affirmative	
5	Bonneville Power Administration	Francis J. Halpin	Affirmative	
5	Brazos Electric Power Cooperative, Inc.	Shari Heino	Affirmative	
5	Caithness Long Island, LLC	Jason M Moore		
5	City and County of San Francisco	Daniel Mason	Negative	
5	City of Austin dba Austin Energy	Jeanie Doty	Affirmative	
5	City of Redding	Paul A. Cummings	Affirmative	
5	City of Tallahassee	Karen Webb	Negative	
5	Cleco Power	Stephanie Huffman	Affirmative	
5	Cogentrix Energy, Inc.	Mike D Hirst	Affirmative	
5	Colorado Springs Utilities	Jennifer Eckels		
5	Consolidated Edison Co. of New York	Wilket (Jack) Ng	Affirmative	
5	Consumers Energy Company	David C Greyerbiehl		
5	Detroit Edison Company	Christy Wicke	Affirmative	
5	Dominion Resources, Inc.	Mike Garton	Affirmative	
5	Duke Energy	Dale Q Goodwine	Affirmative	
5	Edison Mission Marketing & Trading Inc.	Brenda J Frazer	Affirmative	
5	El Paso Electric Company	David Hawkins	Affirmative	
5	Electric Power Supply Association	John R Cashin		
5	Energy Services, Inc.	Tracey Stubbs	Affirmative	
5	Essential Power, LLC	Patrick Brown	Affirmative	
5	Exelon Nuclear	Michael Korchynsky	Affirmative	
5	FirstEnergy Solutions	Kenneth Dresner		
5	Florida Municipal Power Agency	David Schumann	Affirmative	
5	Hydro-Québec Production	Roger Dufresne	Negative	
5	JEA	John J Babik	Affirmative	
5	Kansas City Power & Light Co.	Brett Holland	Affirmative	
5	Kissimmee Utility Authority	Mike Blough	Abstain	
5	Lakeland Electric	James M Howard	Affirmative	
5	Liberty Electric Power LLC	Daniel Duff	Affirmative	
5	Lincoln Electric System	Dennis Florom	Affirmative	
5	Los Angeles Department of Water & Power	Kenneth Silver	Abstain	
5	Lower Colorado River Authority	Tom Foreman		
5	Luminant Generation Company LLC	Mike Laney		
5	Manitoba Hydro	S N Fernando	Abstain	
5	Massachusetts Municipal Wholesale Electric Company	David Gordon	Abstain	
5	MEAG Power	Steven Grego	Affirmative	
5	MidAmerican Energy Co.	Christopher Schneider	Affirmative	
5	Muscatine Power & Water	Mike Avesing	Affirmative	
5	Nebraska Public Power District	Don Schmit	Affirmative	
5	New York Power Authority	Wayne Sipperly	Affirmative	
5	NextEra Energy	Allen D Schriver	Affirmative	

5	North Carolina Electric Membership Corp.	Jeffrey S Brame	Affirmative	
5	Occidental Chemical	Michelle R DAntuono	Affirmative	
5	Omaha Public Power District	Mahmood Z. Safi	Affirmative	
5	Pacific Gas and Electric Company	Richard J. Padilla		
5	PacifiCorp	Sandra L. Shaffer	Affirmative	
5	Platte River Power Authority	Roland Thiel		
5	Portland General Electric Co.	matt E jastram		
5	PPL Generation LLC	Annette M Bannon	Affirmative	
5	Progress Energy Carolinas	Wayne Lewis		
5	Proven Compliance Solutions	Mitchell E Needham		
5	PSEG Fossil LLC	Tim Kucey	Affirmative	
5	Public Utility District No. 1 of Lewis County	Steven Grega	Negative	
5	Public Utility District No. 2 of Grant County, Washington	Michiko Sell	Affirmative	
5	Puget Sound Energy, Inc.	Tom Flynn	Abstain	
5	Sacramento Municipal Utility District	Bethany Hunter	Affirmative	
5	Salt River Project	William Alkema	Affirmative	
5	Santee Cooper	Lewis P Pierce	Negative	
5	Seminole Electric Cooperative, Inc.	Brenda K. Atkins	Negative	
5	Snohomish County PUD No. 1	Sam Nietfeld	Affirmative	
5	Southeastern Power Administration	Douglas Spencer	Affirmative	
5	Southern California Edison Company	Denise Yaffe	Affirmative	
5	Southern Company Generation	William D Shultz	Affirmative	
5	Tacoma Power	Chris Mattson	Affirmative	
5	Tampa Electric Co.	RJames Rocha	Affirmative	
5	Tennessee Valley Authority	David Thompson	Affirmative	
5	TransAlta Corporation	Rebbekka McFadden		
5	Tri-State G & T Association, Inc.	Mark Stein	Affirmative	
5	U.S. Army Corps of Engineers	Melissa Kurtz	Affirmative	
5	U.S. Bureau of Reclamation	Martin Bauer		
5	Westar Energy	Bryan Taggart	Affirmative	
5	WPPI Energy	Steven Leovy	Affirmative	
5	Xcel Energy, Inc.	Liam Noailles	Affirmative	
6	AEP Marketing	Edward P. Cox	Negative	
6	Ameren Energy Marketing Co.	Jennifer Richardson	Affirmative	
6	APS	Randy A. Young	Negative	
6	Bonneville Power Administration	Brenda S. Anderson	Affirmative	
6	City of Austin dba Austin Energy	Lisa L Martin	Affirmative	
6	City of Redding	Marvin Briggs	Affirmative	
6	Cleco Power LLC	Robert Hirchak	Affirmative	
6	Colorado Springs Utilities	Lisa C Rosintoski		
6	Consolidated Edison Co. of New York	Nickesha P Carrol		
6	Constellation Energy Commodities Group	Donald Schopp	Affirmative	
6	Dominion Resources, Inc.	Louis S. Slade	Affirmative	
6	Duke Energy	Greg Cecil		
6	El Paso Electric Company	Tony Soto		
6	Entergy Services, Inc.	Terri F Benoit		
6	FirstEnergy Solutions	Kevin Querry	Affirmative	
6	Florida Municipal Power Agency	Richard L. Montgomery	Affirmative	
6	Florida Municipal Power Pool	Thomas Washburn	Affirmative	
6	Florida Power & Light Co.	Silvia P. Mitchell	Affirmative	
6	Great River Energy	Donna Stephenson		
6	Imperial Irrigation District	Cathy Bretz	Abstain	
6	Kansas City Power & Light Co.	Jessica L Klinghoffer	Affirmative	
6	Lakeland Electric	Paul Shipps	Affirmative	
6	Lincoln Electric System	Eric Ruskamp	Affirmative	
6	Los Angeles Department of Water & Power	Brad Packer	Abstain	
6	Luminant Energy	Brad Jones	Affirmative	
6	Manitoba Hydro	Daniel Prowse	Abstain	
6	MidAmerican Energy Co.	Dennis Kimm	Affirmative	
6	Modesto Irrigation District	James McFall		
6	Muscatine Power & Water	John Stolley	Affirmative	
6	New York Power Authority	Saul Rojas	Affirmative	
6	North Carolina Municipal Power Agency #1	Matthew Schull		
6	Northern Indiana Public Service Co.	Joseph O'Brien	Affirmative	
6	NRG Energy, Inc.	Alan Johnson		
6	Omaha Public Power District	David Ried		

6	PacifiCorp	Scott L Smith	Affirmative	
6	Platte River Power Authority	Carol Ballantine	Affirmative	
6	Portland General Electric Co.	John Jamieson		
6	PPL EnergyPlus LLC	Elizabeth Davis	Affirmative	
6	Progress Energy	John T Sturgeon		
6	PSEG Energy Resources & Trade LLC	Peter Dolan	Affirmative	
6	Public Utility District No. 1 of Chelan County	Hugh A. Owen	Abstain	
6	Sacramento Municipal Utility District	Diane Enderby	Affirmative	
6	Salt River Project	Steven J Hulet	Affirmative	
6	Santee Cooper	Michael Brown	Negative	
6	Seattle City Light	Dennis Sismaet	Affirmative	
6	Seminole Electric Cooperative, Inc.	Trudy S. Novak	Negative	
6	Snohomish County PUD No. 1	William T Moojen		
6	South California Edison Company	Lujuanna Medina	Affirmative	
6	Southern Company Generation and Energy Marketing	John J. Ciza	Affirmative	
6	Tacoma Public Utilities	Michael C Hill	Affirmative	
6	Tampa Electric Co.	Benjamin F Smith II		
6	Tennessee Valley Authority	Marjorie S. Parsons	Affirmative	
6	Westar Energy	Grant L Wilkerson	Affirmative	
6	Western Area Power Administration - UGP Marketing	Peter H Kinney	Affirmative	
6	Xcel Energy, Inc.	David F Lemmons	Affirmative	
8		Edward C Stein	Affirmative	
8		James A Maenner		
8		Roger C Zaklukiewicz		
8	JDRJC Associates	Jim Cyrulewski	Affirmative	
8	Massachusetts Attorney General	Frederick R Plett	Negative	
8	Utility Services, Inc.	Brian Evans-Mongeon		
8	Utility System Effeciencies, Inc. (USE)	Robert L Dintelman		
8	Volkmann Consulting, Inc.	Terry Volkmann		
9	Commonwealth of Massachusetts Department of Public Utilities	Donald Nelson	Negative	
9	National Association of Regulatory Utility Commissioners	Diane J. Barney		
10	Midwest Reliability Organization	William S Smith	Affirmative	
10	New York State Reliability Council	Alan Adamson	Affirmative	
10	Northeast Power Coordinating Council	Guy V. Zito	Abstain	
10	ReliabilityFirst Corporation	Anthony E Jablonski	Affirmative	
10	SERC Reliability Corporation	Carter B. Edge	Affirmative	
10	Southwest Power Pool RE	Emily Pennel	Abstain	
10	Texas Reliability Entity, Inc.	Donald G Jones	Abstain	
10	Western Electricity Coordinating Council	Steven L. Rueckert	Affirmative	

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Washington Office: 1325 G Street, N.W. : Suite 600 : Washington, DC 20005-3801

Individual or group. (20 Responses)
Name (9 Responses)
Organization (9 Responses)
Group Name (11 Responses)
Lead Contact (11 Responses)
IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (0 Responses)
Comments (20 Responses)
Question 1 (19 Responses)
Question 1 Comments (20 Responses)
Question 2 (19 Responses)
Question 2 Comments (20 Responses)
Question 3 (19 Responses)
Question 3 Comments (20 Responses)
Question 4 (19 Responses)
Question 4 Comments (20 Responses)
Question 5 (19 Responses)
Question 5 Comments (20 Responses)
Question 6 (0 Responses)
Question 6 Comments (20 Responses)

Group
Tennessee Valley Authority
Brandy Spraker
Yes
Yes
No
Though the line could be derived from reading the purpose of the standard, it may help avoid potential confusion to the generator owners by specifically excluding generator step-up units from 4.2.1.6 or the second bullet of Attachment B.
No
No
Group
Northeast Power Coordinating Council

Guy Zito
No
The Industry Need statement, as written, implies that the burden of the overlap between PRC-023-3 and PRC-025-1rests with the Generator Owner as the owner of the protection for the elements that connect the generator to the transmission system. The intent of the drafting teams for PRC-023-3 and PRC-025-1 is to segregate the standards so that load-responsive relays used for generator protection are in one standard (PRC-025-1) and load-responsive relays used to protect transmission are in another (PRC-023-3). The Applicability section of PRC 025-1 refers to generator interconnected Facilities which can be construed to mean Generator Owners are responsible for this protection and the terminals at each end. There are Transmission Owners that own protection assets on some, if not all of the terminals for a generator's interconnection. Terminal responsibility needs clarification. The wording places emphasis on asset ownership.
No
The Reliability Functions table has the Planning Coordinator checked. The Planning Coordinator by definition in the NERC Functional Model is "The functional entity that coordinates, facilitates, integrates and evaluates (generally one year and beyond) transmission facility and service plans, and resource plans within a Planning Coordinator area and coordinates those plans with adjoining Planning Coordinator areas." The Planning coordinator does not get involved with generator and transmission relay loadability.
No
The draft SAR and proposed standards PRC-023-3, PRC-025-1 fail to provide a clear distinction as to whether the standard is meant to apply to the owner of a protection system designed to protect transmission elements (which we believe is the intent of PRC-023-3), or the owner of a protection system designed to protect generation elements (which we believe is the intent of PRC-025-1). We believe this was the intent, but the applicability section of either of the proposed standards does not clearly articulate that intent. Suggest the SDT consider an approach similar to that used in PRC-006-1 where the SDT chose to create a 'standard specific entity'; UFLS entities. Alternatively, the applicability could be modified to more closely match the intent indicated in the Applicability section of the Guideline and Technical Basis document, and in the wording of the Supplemental SAR for Project 2010-13.2 Relay Loadability Order 733 Phase 2 (Relay Loadability: Generation). The standard should be applied to the owner of the particular type of protection system, not applied to a particular function. We are aware of circumstances whereby an entity registered as Transmission Owner owns the protection system that protects for faults on the element(s) owned by an entity registered as a Generator Owner which are solely used to interconnect their generator to the bulk power system. We are also aware of circumstances whereby the Generator Owner owns both the element(s) which are solely used to interconnect their generator to the bulk power system as well as the protection system that protects for faults on those generator interconnection element(s). In both of these, the protection system is designed to protect the bulk power system from the fault, not the generator itself. Changes to proposed PRC 023-2 and PRC 025-1 attempt to

establish a bright line, but the functional entity of Generator Owners is still included in PRC 023-3. This results in confusion as to what standard applies for the elements that connect the generator to the BES, as some Transmission Owners own GSU assets. The wording of PRC-025-1, and as stated in the Webinar, imply that “leads assets” will fall under PRC-025-1. There is still confusion in this area so a bright line still has not been established.
No
No
It needs to be made clear that owning the protection systems at the terminals does not imply ownership of the facility. Entities may be responsible for protective relays on each end of a “lead”, but the leads but may be in facilities where one end is owned by a Transmission Owner, and the other end facility is owned by a Generator Owner. The removal of the “Effective Dates” table needs to be re-examined. Among other things, this table included the timelines for meeting PRC-023 on sub-200kV Facilities. If a sub-200kV Facility is identified by the Planning Coordinator, pursuant to Requirement R6, Transmission Owners, Generator Owners, and Distribution Providers must be given a grace period in which to make protection modifications before PRC-023 is applicable to that Facility. PRC-023-2 included a 39-month window for modifying these Facilities once they’ve been identified by the Planning Coordinator. This is an oversight that will cause confusion. In PRC-023-3, in 4.1.2 PRC 023-2 needs to be changed to PRC-023-3.
Group
PacifiCorp
Ryan Millard
Yes
Yes
Yes
No
No
Section 4.1 states that the Transmission Owner, Generator Owner, and Distribution Provider with load-responsive phase protection systems at the terminal of the circuits is responsible for ensuring compliance with PRC-023-3. PacifiCorp maintains that more clarification is needed with respect to who is ultimately responsible for ensuring compliance in instances where the circuit/transmission line has a different owner. Would the owner of the circuit/transmission

line rely on the owner of the relays for ensuring compliance?
Group
Luminant
Brenda Hampton
Yes
Yes
Yes
No
No
Group
Southwest Power Pool Standards Development Team
Jonathan Hayes
Yes
Yes
No
While we agree that the revision to PRC023-2 creates a bright line we feel that language should be included in PRC-25-1 to clearly state that the protection relays under PRC023-2 ,or -3 if the SAR is approved, would be not be applicable under PRC025-1.
No
No
Group
ACES Standards Collaborators
Ben Engelby
No

(1) In order to have a clear “bright line,” the generator owner should not apply to PRC-023. Remove all reference to GO from PRC-023, and then the SAR will satisfy the intent of avoiding double jeopardy.
No
(1) The purpose of the revised SAR is to remove the applicability of GOs for PRC-023-2. Therefore, we recommend unselecting the Generator Owner box in the supplemental SAR, as the revised standard would not apply to GOs.
No
See comments above. There should not be any references to generators in the transmission loadability standard.
No
No
(1) We disagree with including GOs as an applicable entity to PRC-023-2. In order to create a “bright line,” the drafting teams should have separate standards. Have PRC-023 apply to transmission and have PRC-025 apply to generators. It is a simple dividing line. If the team feels that any of the loadability criteria from the transmission loadability standard should be included in PRC-025, then do so, but do not leave any reference to GOs in PRC-023. (2) With the proposed PRC-023-3, there is overlap for GOs. The GO is listed in all six requirements in PRC-023 and in R1 of PRC-025. We recommend removing all references to GOs in PRC-023. If this cannot be accomplished, then update PRC-023-3 to include the aspects of PRC-025 and stop developing a duplicative standard.
Group
Salt River Project
Bob Steiger
Yes
Yes
Yes
No
No
No Comment
Individual

Oliver Burke
Entergy Services, Inc. (Transmission)
Yes
Yes
Yes
No
Yes
Elimination of the table under number 5 of section A in PRC-023-2.
Comments to NERC on Proposed PRC-023-3 Standard It is understood that PRC-023-3 is intended to replace PRC-023-1 and PRC-023-2 in the near future. The changes proposed for PRC-023-3 in comparison with PRC-023-2 are mainly the removal of the table under number 5 of section A. The table being removed provides the effective dates of the requirements in the PRC-023-2 standard corresponding to the applicable Functional Entities and circuits. Entergy has concerns over the removal of the table as explained below. Our specific area of concern is on the effective date of PRC-023-3 which is defined in the standard as the “first day of the first calendar quarter beyond the date that this standard is approved by applicable regulatory authorities”. (See the bottom of page 1 of the proposed PRC-023-3 standard.) In the Implementation Plan for the proposed PRC-023-3 standard, it is stated that entities applicable to this standard shall be 100% compliant on the effective date of the standard. (See the last line on page 2 of the Implementation Plan.) In other words, the Implementation Plan considers a specific implementation period as not required based on the following two reasons. (See section General Considerations at the bottom of page 1 of the Implementation Plan.) 1. No new entity or facilities are subject to compliance. 2. The implementation plan and period for PRC-023-2 will have been achieved. Entergy sees some scenarios that do not agree with either or both of the above reasons. In such scenarios, the PRC-023-3 effective date and Implementation Plan become problematic. In short, PRC-023-3 proposes to retroactively eliminate the NERC-defined implementation time for ongoing PRC-023-2 compliance activities. A couple of scenarios are provided below for illustration purposes. The first scenario is related to the effective date of requirements R6 and R1 of PRC-023-2. PRC-023-2 became effective in the United States on July 1, 2012. (See the Background section on page 1 of the Implementation Plan for PRC-023-3.) However, PRC-023-2 gives various effective dates that are to be phased in over the period of more than four years. According to the table on pages 2-4 of the PRC-023-2 standard, R6 will become effective on 1/1/2014. For circuits identified by the Planning Coordinator pursuant to Requirement R6, R1 is to be effective 39 months following notification by the Planning Coordinator of their inclusion on a list of circuits subject to PRC-023-2 per application of Attachment B. It means that the applicable entity is given 39 months

to develop and implement a plan to bring the applicable circuits to compliance. Therefore, the compliance date can be as late as 4/1/2017 or beyond depending on when the Planning Coordinator will send out its notification on applicable circuits. If PRC-023-3 becomes effective before such date, it will be problematic. For reference, the relevant effective dates for R6 and R1 as specified in PRC-023-2 (Please review Effective Dates as provided in table for NERC Standard PRC-023-2). The second scenario is about new circuits identified by Planning Coordinator during its assessments that are required to be conducted at least once each calendar year pursuant to R6 of PRC-023-3. (See the middle of page 4 of the PRC-023-3 standard.) When new circuits are identified as the result of the yearly assessment, applicable entities will need reasonable amount of time to bring the circuit to compliance. This time period is necessary for budget reasons as well as project planning and construction reasons. While both PRC-023-1 and PRC-023-2 recognize such a need, the proposed standard PRC-023-3 does not. (See section 5.1.3 on page 1 of PRC-023-1 and effective date table on pages 2-4 of PRC-023-2.) Entergy suggests that a 39 months long period of time be given to applicable entities to comply with the PRC-023-3 standard for each facility that is added to the Planning Coordinator's list. Please review the referenced NERC standard documents. 1) NERC Standard PRC-023-1 2) NERC Standard PRC-023-2 3) NERC Proposed Standard PRC-023-3 (clean) 4) NERC PRC-023-3 Implementation Plan
Individual
Thad Ness
American Electric Power
Yes
Yes
No
AEP believes that the proposed changes in the draft PRC-023-3 create a bright line identifying the scope of PRC-023-3. However, the proposed draft of PRC-025-1 does not create a bright line identifying the scope of PRC-025-1. Load-responsive protective relays installed on the high side terminals of the Generator Step-Up transformer looking towards the Transmission system are clearly in scope for PRC-023-3 but are not clearly excluded from being applicable from PRC-025-1. AEP recommends including in PRC-025-1 verbiage clearly excluding load-responsive protective relays applicable to PRC-023-3 from PRC-025-1.
No
No
AEP believes there is a typo in PRC-023-3 Section 4.1.2. The statement references PRC-023-2 instead of the current standard revision.
Individual

Ed Croft
Puget Sound Energy
Yes
No
Possibly the GO (section 4.1.2) should be taken out. This function is covered in PRC-025. Taking the GO function out of PRC-023 (and any accompanying items) would further strengthen the brightline between PRC-023-3 and PRC-025-1.
No
see answer to question 2
No
No
Individual
Nazra Gladu
Manitoba Hydro
No
(1) Similar to PRC-025, the phrase “while maintaining reliable protection of the BES” is vague. There are no objective criteria specified for this determination, nor is it clear whether this element will be audited in some fashion. If this element of the requirement cannot be audited, it should be deleted. At a minimum, it should specify that the Responsible Entity makes this determination in its sole discretion.
Yes
No comment.
No
(1) In section 4.1.1, 4.1.2 and 4.1.3, the redlined part “at the terminals of” should be changed to “at the Transmission Owner terminals of”, “at the generator owner terminals of” and “at the Distribution Owner terminals of”. Also, PRC-023-2 in section 4.1.2 should be changed to PRC-023-3.
No
No comment.
No
No comment.
No comment.
Individual

Michael Falvo
Independent Electricity System Operator
Yes
Yes
Yes
No
No
Group
Dominion
Mike Garton
No
Dominion believes the Industry Need as indicated in the SAR could be better stated. We believe the intent of the drafting teams for PRC-023 and PRC-025 is to segregate the standards so that load-responsive relays used for generator protection are in one standard (PRC-025) and load-responsive relays used to protect the bulk power system (Transmission as defined in the NERC Glossary ; An interconnected group of lines and associated equipment for the movement or transfer of electric energy between points of supply and points at which it is transformed for delivery to customers or is delivered to other electric systems.) are in another (PRC-023). The SAR as written appears to infer that, in all cases, the GO owns the protection system that contains the load-responsive relays that protect Transmission (as defined in the NERC Glossary) from faults that occur on the element(s) that make up the Facility used to connect the generator to Transmission. PRC 025 refers to generator interconnected Facilities (ie generator leads..some refer to this as GSU leads) which implies Generator Owners are responsible for this protection and the terminals at each end. There are TOs that own “lead” assets either on both ends or possibly one end of the leads. This is an area that needs further clarification when referring to terminal responsibility. Appears now that wording places emphasis on asset ownership?
No
Under 4.1.2 PRC 023-2 needs to be changed to PRC023-3.
No
The draft SAR and proposed standards PRC-023-3, PRC-025-1 fail to provide a clear distinction as to whether the standard is meant to apply to the owner of a protection system designed to

protect transmission elements (which we believe is the intent of PRC-023) or the owner of a protection system designed to protect generation elements (which we believe is the intent of PRC-025). We believe this was the intent of the SDT but we don't believe the applicability section of either of the proposed standards clearly articulates that intent. We suggest the SDT consider an approach similar to that used in PRC-006-1 where the SDT chose to create a 'standard specific entity'; UFLS entities. Alternatively, the applicability could be modified to more closely match the intent as indicated in the Applicability section of the Guideline and Technical Basis document and the Supplemental SAR for Project 2010-13.2 Relay Loadability Order 733 Phase 2 (Relay Loadability: Generation). We believe the standard should be applied to the owner of the particular type of protection system, not applied to a particular function. We are aware of circumstances whereby an entity registered as TO owns the protection system that protects for faults on the element(s) owned by an entity registered as a GO which are solely used to interconnect their generator to the bulk power system. We are also aware of circumstances whereby the GO owns both the element(s) which are solely used to interconnect their generator to the bulk power system as well as the protection system that protects for faults on those generator interconnection element(s). In both of these, the protection system is designed to protect the bulk power system from the fault, not the generator itself. Changes to proposed PRC 023-2 and PRC 025-1 attempts to establish a bright line but the functional entity of Generator Owners is still included in PRC 023 so this results in confusion as to what standard applies for the elements that connect the generator to the BES as some Transmission Owners own GSU assets but the new standard and as stated on the Webinar it implies that "leads assets" will fall under PRC 025. There is still confusion in this area so a bright line still has not been established.
No
No
It needs to be clear that at the terminals does not imply ownership. Entities may be responsible for protective relays on each end of the leads but may be in facilities where one end is owned by a TO and the other end facility is owned by a GO. - The removal of the "Effective Dates" table needs to be reexamined. Among other things, this table included the timelines for meeting PRC-023 on sub-200kV Facilities. If a sub-200kV Facility is identified by the Planning Coordinator, pursuant to Requirement R6, Transmission Owners, Generator Owners, and Distribution Providers must be given a grace period in which to make protection modifications before PRC-023 is applicable to that Facility. PRC-023-2 included a 39-month window for modifying these Facilities once they've been identified by the Planning Coordinator. This is an oversight that will cause confusion.
Individual
Timothy Brown
Idaho Power Co.
Yes

Yes
Yes
No
No
There will obviously be additional work to perform the analysis needed to be compliant with the standard. The only business practice that will need to be modified is to perform this analysis for any new or modified generators or generator protective relays to ensure compliance.
Individual
Dale Fredrickson
Wisconsin Electric Power Company
No
Adding this phrase does little to remove the confusion as to applicability to Generator Owners.
No
The applicability of this standard should be removed from the Generator Owner.
No
Any requirements applicable to the Generator Owner should be in a single standard, PRC-025-1. When this standard is approved, Generator Owners that employ load-sensitive relaying on the high-voltage side of the generator step-up transformer, between the GSU and the interconnection with the Transmission system, will be subject to the PRC-025-1 requirements in 3.2.4 for Generator interconnection Facilities, and at that time the PRC-023 standard should have all applicability to Generator Owners removed.
No
No
Individual
Travis Metcalfe
Tacoma Power
No
The phrase “at the terminals of the” does not seem to mitigate the potential overlap between

PRC-023 and PRC-025. Should not the distinction be drawn for generation interconnection Facility(ies)? In other words, it seems that transmission lines only connecting generation would be subject to PRC-025-1 and that transmission lines that are part of the more interconnected transmission system would be subject to PRC-023-3. If the Generator Relay Loadability Standard Drafting Team disagrees, additional clarification is requested as to how the phrase “at the terminals of the” mitigates the potential overlap.
Yes
No
The phrase “at the terminals of the” does not seem to mitigate the potential overlap between PRC-023 and PRC-025. Should not the distinction be drawn for generation interconnection Facility(ies)? In other words, it seems that transmission lines only connecting generation would be subject to PRC-025-1 and that transmission lines that are part of the more interconnected transmission system would be subject to PRC-023-3. If the Generator Relay Loadability Standard Drafting Team disagrees, additional clarification is requested as to how the phrase “at the terminals of the” mitigates the potential overlap.
No
No
Group
PPL Corporation NERC Registered Affiliates
Stephen J. Berger
No
The PPL Companies do not agree that addition of the phrase includes the specificity needed to ensure “double jeapordy” for generation. As stated by the North American Generators Forum standards review team: Load-responsive protective relays installed on the high side terminals of the Generator Step-up transformer looking towards the Transmission system appear to be clearly in scope for PRC-23-3 but are not clearly excluded from being applicable to PRC-025-1.
Yes
No
No
No

Individual
Bradley Collard
Oncor Electric Delivery LLC
Oncor is not registered as a Generator Owner, nor does it perform the functions of a Generator Owner. Thus, this question is not applicable to Oncor.
Oncor is not registered as a Generator Owner, nor does it perform the functions of a Generator Owner. Thus, this question is not applicable to Oncor.
Oncor is not registered as a Generator Owner, nor does it perform the functions of a Generator Owner. Thus, this question is not applicable to Oncor.
Oncor is not registered as a Generator Owner, nor does it perform the functions of a Generator Owner. Thus, this question is not applicable to Oncor.
No Comment
The phase-in time for a newly declared critical circuit was removed from the draft PRC-023-3 Effective Dates section; the phase-in time needs to be added back to PRC-023-3. As written in PRC-023-2, R6 requires Planning Coordinators to conduct an assessment of critical circuits on a periodic basis and provide “new circuits” to the appropriate registered entity. The Effective Dates section of PRC-023-2 states a registered entity will have 39 months to comply for newly declared critical circuits following declaration by the Planning Coordinator. This phase-in time period provides necessary time for a registered entity to budget and implement a project to meet PRC-023-2 compliance. The 39 month phase-in period was an acceptable and approved timeframe and should be added back to PRC-023-3.
Group
SERC Protection and Controls Subcommittee
David Greene
Yes
Yes
Yes
No
No
There may be owner issues that impact entity registration.
- It needs to be clear that 'at the terminals' does not imply ownership. Entities may be responsible for protective relays on each end of the leads but may be in facilities where one end is owned by a TO and the other end facility is owned by a GO. - The removal of the “Effective Dates” table needs to be reexamined. Among other things, this table included the

timelines for meeting PRC-023 on sub-200kV Facilities. If a sub-200kV Facility is identified by the Planning Coordinator, pursuant to Requirement R6, Transmission Owners, Generator Owners, and Distribution Providers must be given a grace period in which to make protection modifications before PRC-023 is applicable to that Facility. PRC-023-2 included a 39-month window for modifying these Facilities once they've been identified by the Planning Coordinator. This is an oversight that will cause confusion. The comments expressed herein(Questions 1-6) represent a consensus of the views of the above-named members of the SERC EC Protection and Control Subcommittee only and should not be construed as the position of SERC Reliability Corporation, its board, or its officers.
Group
Bonneville Power Administration
Jamison Dye
No
The difference between "applied to circuits defined in 4.2.1" and "applied at the terminals of the circuits defined in 4.2.1" is not clear. If there is any difference, it is subtle, and probably not worth revising PRC-023-2 for. The bigger problem is that transmission lines over 200kV that attach generating facilities to the BES seem to be covered by both PRC-023 and PRC-025. PRC-025 applies to Generation interconnection Facilities, but there is no definition of this term. It seems that a 230kV line that connects a GSU transformer to a substation would be considered to be a Generation interconnection facility, and subject to both standards. Therefore, there are two very different requirements that apply to the relays on such a line. A definition of Generator interconnection Facilities is needed, and clarification of which standard the example given above would be covered by is needed.
No
BPA believes there needs to be a clearer delineation between generator facilities and transmission facilities and PRC-023 and PRC-025 written so that there is no overlap between the two. Then the applicability of both PRC-023 and PRC-025 can be easily applied to the owners of the facilities covered by that standard, whether they are registered as a GO, TO, or DP. As PRC-025 is proposed, it only applies to GO's, but what if a TO owns the relays applied to a GSU transformer? These relays would presently not be covered by either PRC-023 or PRC-025.
No
As described in comments 1 and 2, BPA believes there needs to be a definition of "Generator interconnection Facilities" if this term will be used in PRC-025. There needs to be a clear separation between facilities included in PRC-023 and those included in PRC-025, with no overlap. The most likely place for this separation would be at the high-voltage terminal of the GSU transformer, with the GSU and everything between it and the generators included in PRC-025, and the line connecting the GSU to the BES included in PRC-023.
No

No

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Consideration of Comments

Phase 1 of Glossary Updates: Statutory Definitions
Project 2012-08.1

The Project 2012-08.1 Drafting Team thanks all commenters who submitted comments on the inclusion of the statutory definitions for Bulk-Power System, Reliability Standards, and Reliable Operation in the NERC Glossary of Terms. These standards were posted for a 30-day public comment period from February 21, 2013 through March 22, 2013. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form. There were 29 sets of comments, including comments from approximately 72 different people from approximately 44 companies representing all of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's project page.

If you feel that your comment has been overlooked, 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, Mark Lauby, at 404-446-2560 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.[1]

[1] The appeals process is in the Standard Processes Manual: http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf

Index to Questions, Comments, and Responses

The Industry Segments are:

1 — Transmission Owners
2 — RTOs, ISOs
3 — Load-serving Entities
4 — Transmission-dependent Utilities
5 — Electric Generators
6 — Electricity Brokers, Aggregators, and Marketers
7 — Large Electricity End Users
8 — Small Electricity End Users
9 — Federal, State, Provincial Regulatory or other Government Entities
10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Guy Zito	Northeast Power Coordinating Council										X

	Additional Member	Additional Organization	Region	Segment Selection
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10
2.	Carmen Agavriloai	Independent Electricity System Operator	NPCC	2
3.	Greg Campoli	New York Independent System Operator	NPCC	2
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
5.	Brian Robinson	Utility Services	NPCC	8
6.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
7.	Donald Weaver	New Brunswick System Operator	NPCC	2
8.	Kathleen Goodman	ISO - New England	NPCC	2
9.	Wayne Sipperly	New York Power Authority	NPCC	5
10.	David Kiguel	Hydro One Networks Inc.	NPCC	1

Group/Individual	Commenter	Organization	Registered Ballot Body Segment									
			1	2	3	4	5	6	7	8	9	10

11.	Christina Koncz	PSEG Power LLC	NPCC	5
12.	Randy MacDonald	New Brunswick Power Transmission	NPCC	9
13.	Bruce Metruck	New York Power Authority	NPCC	6
14.	Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
15.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
16.	Robert Pellegrini	Th United Illuminating Company	NPCC	1
17.	Si-Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
18.	David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

2.	Group	Mike Lowman	Duke Energy	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Doug Hills			1
2.	Lee Schuster			3
3.	Dale Goodwine			5
4.	Greg Cecil			6

3.	Group	Morgan Senkal	Bonneville Power Administration	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Erika Doot	BPA, Generation Support	WECC	3, 5, 6
2.	James Burns	BPA, Technical Operations	WECC	1
3.	Timothy Loepker	BPA, Dittmer Dispatch	WECC	1
4.	John Anasis	BPA, Technical Operations	WECC	1
5.	Fran Halpin	BPA, Duty Scheduling	WECC	5

4.	Group	Dennis Chastain	Tennessee Valley Authority	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	DeWayne Scott		SERC	1
2.	Ian Grant		SERC	3
3.	David Thompson		SERC	5
4.	Marjorie Parsons		SERC	6

5.	Group	Ben Engelby	ACES Standards Collaborators						X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
2.	William Hutchison	Southern Illinois Power Cooperative	SERC	1									
3.	Shari Heino	Brazos Electric Power Cooperative, Inc.	ERCOT	1, 5									
4.	John Shaver	Arizona Electric Power Cooperative/Southwest Transmission Cooperative, Inc.	WECC	1, 4, 5									
5.	Scott Brame	North Carolina Electric Membership Corporation	RFC	1, 3, 4, 5									
6.	Megan Wagner	Sunflower Electric Power Corporation	SPP	1									
6.	Group	Sasa Maljukan	Hydro One Networks Inc.	X									
	Additional Member	**Additional Organization**	**Region**	**Segment Selection**									
1.	David Kiguel	Hydro One Networks Inc.	NPCC	1									
7.	Group	Randi Heise	Dominion - NERC Compliance Policy	X		X		X	X				
	Additional Member	**Additional Organization**	**Region**	**Segment Selection**									
1.	Michael	Crowley	SERC	1, 3									
2.	MIke	Garton	MRO	5, 6									
3.	Connie	Lowe	RFC	5, 6									
4.	Louis	Slade	NPCC	5, 6									
5.	Randi	Heise	SERC	6									
8.	Individual	Janet Smith	Arizona Public Service Company	X		X		X	X				
9.	Individual	John Falsey	Invenergy LLC					X					
10.	Individual	Michelle R D'Antuono	Occidental Energy Ventures Corp.			X		X		X			
11.	Individual	Greg Froehling	Rayburn Country Electric Cooperative			X							
12.	Individual	Russ Schneider	Flathead Electric Cooperative, Inc.			X	X						
13.	Individual	Greg Froehling	Rayburn Country Electric Cooperative			X							
14.	Individual	Nazra Gladu	Manitoba Hydro	X		X		X	X				
15.	Individual	Wryan J. Feil	Northeast Utilities	X									
16.	Individual	Frederick R Plett	Massachusetts Attorney General								X		
17.	Individual	Mike Hendrix	Idaho Power Company	X									
18.	Individual	Michael Falvo	Independent Electricity System Operator		X								
19.	Individual	Thad Ness	American Electric Power	X		X		X	X				

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
20.	Individual	Karen Webb	City of Tallahassee					X					
21.	Individual	Bill Fowler	City of Tallahassee			X							
22.	Individual	Tiffany Lake	Westar Energy	X		X		X	X				
23.	Individual	Scott Langston	City of Tallahassee	X									
24.	Individual	Bret Galbraith	Seminole Electric			X	X	X	X				
25.	Individual	Kathleen Goodman	ISO New England Inc		X								
26.	Individual	Spencer Tacke	Modesto Irrigation District			X	X		X				
27.	Individual	Roger Dufresne	Hydro-QuÃ©bec Production					X					
28.	Individual	daniel mason	HHWP					X					
29.	Individual	Scott McGough	Geogia System Operations Corporation			X							
30.	Individual	Jason Snodgrass	Georgia Transmission Corporation	X									
31.	Individual	Rich Salgo	NV Energy	X		X		X					
32.	Individual	Patrick Brown	Canadian Electricity Association										

If you support the comments submitted by another entity and would like to indicate you agree with their comments, please select "agree" below and enter the entity's name in the comment section (please provide the name of the organization, trade association, group, or committee, rather than the name of the individual submitter).

Summary Consideration:

Organization	Agree	Supporting Comments of "Entity Name"
Modesto Irrigation District	Agree	IRC SRC

1. **Do you have any comments regarding the inclusion of the statutory definitions for Bulk-Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms?**

Summary Consideration:

Organization	Yes or No	Question 1 Comment
Hydro One Networks Inc.	No	Hydro One suggests that any definition and standards applicability considerations should account for the fact that NERC is the recognized ERO in areas that are beyond the Commission's jurisdiction and include Canada and parts of Mexico. With that in mind Hydro One suggests that the definition of the "Reliability Standard" is amended to replace "approved by the Commission" with "approved by Applicable Governmental Authorities"The proposed definition of the "Reliability Standard" uses extensively the lower cased term "bulk-power system" to align it with the Section 215 of Energy Policy Act. The term "bulk-power system" should be used only when referring to the interconnected grid in general. Bulk Electric System ("BES") is to be used in the context of NERC Reliability Standards. BES is a FERC and other applicable governmental authorities approved term. Furthermore, in Order 693, FERC found that "BES" was acceptable and should be used in the context of the applicability of Reliability Standards or NERC's monitoring and enforcement of compliance with the Reliability Standards. BES is the portion of the bulk power system to which standards apply and should be used when that specific meaning is intended. It is our belief that the Reliability Standards should apply to the BES as a subset of bulk-power system as defined in Section 215 of the Energy Policy Act. Using the "bulk-power system" introduces confusion and should be removed. According to the above, Hydro One recommends the

Organization	Yes or No	Question 1 Comment
		following definition of Reliability Standard:"Reliability Standard" means a requirement, approved by the governmental authority in each applicable jurisdiction, to provide for the reliable operation of the Bulk Electric System. The term includes requirements for the operation of existing Bulk Electric System facilities, including cyber security protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the Bulk Electric System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.
Response: Thank you for your comments. In order to clarify the meaning of "Commission" and "section" in the definition for Reliability Standard, language is being added to reflect that in the United States the Federal Energy Regulatory Commission ("FERC" or the "Commission") approves standards under Section 215 of the Federal Power Act. However, for other jurisdictions, the applicable governmental authority approves or recognizes standards. Further, in Order No. 693, FERC issued the directive to modify the NERC Glossary to include the Bulk-Power System ("BPS") definition which is being addressed through this project. Most Reliability Standards apply to the Bulk Electric System ("BES"), and recently FERC issued Order No. 773 which provides guidance on facilities that are part of the BES.		
Hydro-QuÃ©bec Production	No	Comments: The title of the Reliability Standard document is "Reliability Standards for the Bulk Electric Systems of North America". We are surprise that the "Reliability Standard" definition doesn't refer to the "Bulk Electric Systems", but only to the bulk-power-system. We think that this is confusing and RS definition should be revised to precise how it applies to BES facilities.
Response: Thank you for your comments. The Commission's directive in Oder No. 693 was to adopt the "statutory definitions" for the definitions presented in this project. BES is a subset of the BPS, so the terms are not interchangeable. Also, FERC recently issued Order No. 773 which provides guidance on facilities that are part of the BES.		
Geogia System Operations Corporation	No	The FERC Directive rests on a misunderstanding of the NERC standards development process. Terms are added to the glossary as they are

Organization	Yes or No	Question 1 Comment
		introduced in the development or revision of a standard; they are not added speculatively in anticipation that they will be used later, or retroactively to modify the meaning of a standard. The FERC directive to add these definitions should be taken as a directive to revise the affected standards using the statutory definitions and at that point add them to the glossary. Using this approach will provide industry the opportunity to focus on how utilizing these definitions might change the meaning of the affected standards. Through the standards development process it might be concluded that the statutory definition can be applied with no adverse consequences, resulting in a trivial revision of the standard (i.e. the addition of the term to the glossary and the capitalizing of the term in the standards). However it is also possible that the SDT and industry will conclude that additional changes to the standard are required to reflect the intended meaning of affected requirements in light of the new definition. Using the standards development process such changes could be made. If this SAR is approved there will be no such flexibility. The new definitions will be added as written with no opportunity for modification to the definitions or to standards that use these terms in the lower case. This would result in confusion about whether these definitions apply to non-capitalized terms that pre-date the definition. It could also lead to unintended consequences of applying a new definition to an existing requirement without a thorough vetting of the impact of the changes. Regarding the most recent efforts and subsequent FERC-approved "BES" definition as it resides in the NERC Glossary of Terms Used in NERC Reliability Standards, there remains confusion on behalf of industry as to the necessity of including the term of "BPS" in the Glossary. Specifically, in Order 693, FERC found that "BES" was acceptable and should be used in the context of the applicability of Reliability Standards or NERC's monitoring and enforcement of compliance with the Reliability Standards. Undue confusion would ensue with the proposed inclusion of the statutory

Organization	Yes or No	Question 1 Comment
		definition of "BPS" into the Glossary and its intended use by industry and any regulatory body. GSOC also has concerns with the reference to lower case "bps" within the statutory term "Reliability Standard" if approved within the NERC Glossary. Specifically, FERC has praised the clarity of the revised definition of BES and also clarified that Reliability Standards refer to the bulk electric system. The NERC defined term within the NERC glossary should be consistent with FERC and the industry's common understanding that Reliability Standards refer to the bulk electric system. Using the statutory definition without modification, only adds more confusion because lower case term "bps" does not equal BES, and would now introduces 3 terms that people will begin to ponder (BPS, BES, or bps). Therefore, GSOC proposes the following definition for Reliability Standard: o "Reliability Standard" means a requirement, approved by the Commission, to provide for Reliable Operation of the Bulk Electric System. The term includes requirements for the operation of existing Bulk Electric System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the Bulk Electric System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.
Response: Thank you for your comments. The Commission's directive in Oder No. 693 was to adopt the "statutory definitions," and since the BES is a subset of the BPS, the terms are not interchangeable. FERC has also provided guidance on the BES definition in Order No. 773. Further, these definitions will apply to terms that are currently capitalized in any Reliability Standard. Where a Reliability Standard includes a non-capitalized term, capitalization will be considered during the next standards development project involving the requirement.		
Invenergy LLC	No	
Manitoba Hydro	No	

Organization	Yes or No	Question 1 Comment
Westar Energy	No	
Northeast Power Coordinating Council	Yes	Should Reliability Standards apply only to the Bulk Electric System, or the Bulk Power System? The two definitions are redundant. All Reliability Standards should be consistent in the use of one term. It has been suggested that this reference to the Bulk Electric System might move to a totally different definition rather than keeping it "statutory".The definition for Reliability Standard "...does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity." It should also be stated that the ERO does not have the authority to dictate safety standards. It has been suggested by listing everything NERC/FERC can't do implies that what isn't mentioned means they can do it.The definition of Reliability Standard includes the phrase "...approved by the Commission under this section..." A footnote should be added to clarify that this is referring to Section 215 in the EPAct 2005.The definitions in Project 2012-08.1 are exactly as they appear in Section 215, which appears to be what FERC directed in Order 693 at 1894. The problem is that Reliability Standard is defined differently in the Rules of Procedure (see the following paragraph) which is a concern. There should not be multiple definitions of a term.Appendix 2 to the NERC Rules of Procedure (Effective march 5, 2013) "Reliability Standard" means a requirement to provide for Reliable Operation of the Bulk Power System, including without limiting the foregoing, requirements for the operation of existing Bulk Power System Facilities, including cyber security protection, and including the design of planned additions or modifications to such Facilities to the extent necessary for Reliable Operation of the Bulk Power System, but the term does not include any requirement to enlarge Bulk Power System Facilities or to construct new transmission capacity or generation capacity. A Reliability Standard shall not be effective in the United States until approved by the Federal Energy Regulatory Commission and shall not be

Organization	Yes or No	Question 1 Comment
		effective in other jurisdictions until made or allowed to become effective by the Applicable Governmental Authority.Suggest to include the following wording after each statutory definition listed (or add as a footnote) in the NERC Glossary of Terms "Definition": (Statutory Definition from Section 215 of the Federal Power Act of 2005 per FERC order 693.)The title of the Reliability Standard document is "Reliability Standards for the Bulk ElectricSystems of North America". It is surprising that the "Reliability Standard" definition doesn't refer to the "Bulk Electric Systems", but only to the bulk power system. We think that this is confusing and the Reliability Standard definition should be revised to be precise as to how it applies to BES facilities. The definition of Reliablity Standard is problematic. It should be reviewed in the context of the ERO being an International ERO. The revised definition implies approval by FERC is the only condition of a reliablity standard and the mention of Canadian jurisdictional approvals was entirely removed. Regarding the opening sentence in the same definition, "Reliablity Standard means a requirement...."--a standard is not a requirement in and of itself, and the language presents issues. The NPCC participating members suggest that any definition and standards applicability considerations should account for the fact that NERC is the recognized ERO in areas that are beyond the Commission's jurisdiction and include Canada and parts of Mexico. With that in mind suggest that the definition of the "Reliability Standard" is amended to replace "approved by the Commission" with "approved by Applicable Governmental Authorities".The proposed definition of the "Reliability Standard" uses extensively the lower case term "bulk-power system" to align it with the Section 215 of Energy Policy Act. The term "bulk-power system" should be used only when referring to the interconnected grid in general. Bulk Electric System ("BES") is to be used in the context of NERC Reliability Standards. BES is a FERC and other applicable governmental authorities approved term. Furthermore, in Order 693, FERC found that "BES" was acceptable

Organization	Yes or No	Question 1 Comment
		and should be used in the context of the applicability of Reliability Standards or NERC's monitoring and enforcement of compliance with the Reliability Standards. BES is the portion of the bulk power system to which standards apply and should be used when that specific meaning is intended. It is our belief that the Reliability Standards should apply to the BES as a subset of bulk-power system as defined in Section 215 of the Energy Policy Act. Using the "bulk-power system" introduces confusion and should be removed.According to the above, NPCC participating members recommend the following definition of Reliability Standard:"Reliability Standard" means a requirement, approved by the governmental authority in each applicable jurisdiction, to provide for the reliable operation of the Bulk Electric System. The term includes requirements for the operation of existing Bulk Electric System facilities, including cyber security protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the Bulk Electric System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.The definitions listed in the NERC Rules of Procedure (Appendix A) for Bulk-Power System, Reliability Standard, and Reliable Operation should be updated. The definitions should be identical to the definitions found in Section 215 of the Federal Power Act.
Response: Thank you for your comments. In order to clarify the meaning of "Commission" and "section" in the definition for Reliability Standard, language is being added to reflect that in the United States FERC approves standards under Section 215 of the Federal Power Act. However, for other jurisdictions, the applicable governmental authority approves or recognizes standards. Further, in Order No. 693, FERC issued the directive to modify the NERC Glossary to include the BPS definition which is being addressed through this project. Since BES is a subset of the BPS, the terms are not interchangeable. Therefore, both terms are necessary. Most Reliability standards will apply to the BES, and recently FERC issues Order No. 773 which provides guidance on facilities that are part of the BES. With regard to the Rules of Procedure ("ROP"), any future updates will be made through a separate project.		

Organization	Yes or No	Question 1 Comment
Duke Energy	Yes	In the definition of “Reliability Standard”, the phrase “this section” should be changed to “Section 215 of the Federal Power Act” for clarity.
Response: Thank you for your comments. In order to clarify the meaning of “Commission” and “section” in the definition for Reliability Standard, language is being added to reflect that in the United States FERC approves standards under Section 215 of the Federal Power Act. However, for other jurisdictions, the applicable governmental authority approves or recognizes standards.		
Bonneville Power Administration	Yes	BPA agrees with the drafting team's decision to propose definitions for Bulk-Power System, Reliability Standard, and Reliable Operation for inclusion in the NERC Glossary that are identical to the definitions found in Section 215 of the Federal Power Act. BPA believes that this approach is consistent with the Commission's directive in paragraph 1894 of Order 693 to "to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard."
Response: Thank you for your comments and your support of efforts of this project.		
Tennessee Valley Authority	Yes	These terms should be denoted in the NERC Glossary of Terms to identify the statutory nature/source. The glossary is currently divided into two sections: Continent-wide Terms and Regional Terms. A third section could be added for “United States Statutory Terms”, with these three definitions added to that section. Alternatively, if they are added to the “Continent-wide Terms” section of the glossary, they should be followed with a bracketed notation identifying the source.
Response: Thank you for your comments. In order to clarify the meaning of “Commission” and “section” in the definition for Reliability Standard, language is being added to reflect that in the United States FERC approves standards under Section 215 of the Federal Power Act. For other jurisdictions, the applicable governmental authority approves or recognizes standards. This clarifies that the terms are continent-wide.		

Organization	Yes or No	Question 1 Comment
ACES Standards Collaborators	Yes	(1) We do not understand why this is project has multiple phases. We recommend including all applicable statutory definitions in this phase of the project. Considering that this project is only adding existing terms to the glossary, we recommend including everything in a single phase. Please provide additional information about what the future phases would include.(2) Based on your project page we agree the reliability standards would only be applicable to theBulk Electric System.(3) These statutory definitions should be added to the Rules of Procedure Definition of Terms, not the Reliability Standards Glossary of Terms. Adding the statutory definitions to NERC's Rules of Procedure Definition of Terms would satisfy the FERC directive, because recent development of the Bulk Electric System definition had not occurred at the time of the directive, and the changes to the BES definition have caused enough confusion as the only glossary term. We are concerned that the introduction of BPS to the reliability standards glossary of terms would only add uncertainty to complying with reliability standards.(4) Thank you for the opportunity to comment.
Response: Thank you for your comments. This project is divided into phases to address all of the Glossary directives in Order No. 693. Also, the BPS definition is being added to the NERC Glossary to address the FERC directive in Order No. 694 that calls for the modification of the NERC Glossary to add the statutory definition of BPS. Finally, future updates to the ROP will be made through a separate project.		
NERC Compliance Policy	Yes	Dominion supports defining these terms as they as defined in Section 215 of the Federal Power Act (and copied below) : The term 'bulk-power system' means-(A) facilities and control systems necessary for operating an interconnectedelectric energy transmission network(or any portion thereof); and(B) electric energy from generation facilities needed to maintain transmissionsystem reliability.The term does not include facilities used in the local distribution of electric energy.The term 'reliability standard' means a requirement, approved by the Commissionunder this

Organization	Yes or No	Question 1 Comment
		section, to provide for reliable operation of the bulk-power system. The termincludes requirements for the operation of existing bulk-power system facilities,including cybersecurity protection, and the design of planned additions or modificationsto such facilities to the extent necessary to provide for reliable operation of the bulkpowersystem, but the term does not include any requirement to enlarge such facilities orto construct new transmission capacity or generation capacity.The term 'reliable operation' means operating the elements of the bulk-powersystem within equipment and electric system thermal, voltage, and stability limits so thatinstability, uncontrolled separation, or cascading failures of such system will not occur asa result of a sudden disturbance, including a cybersecurity incident, or unanticipatedfailure of system elements.Additionally, the 'background information' suggests that approving this project will "ensure both the NERC Glossary of Terms used in Reliability Standards and the NERC ROP contain consistent (identical) definitions for these terms." It should be noted that the term 'reliability standard' is defined differently in Appendix 2 of the NERC Rules of Procedure (ROP) (effective March 5, 2013). Dominion believes the statutory language should be used consistently and therefore suggests revising the ROP.
Response: Thank you for your comments and your support of this project. Also any future updates to the ROP will be made through a separate project.		
Arizona Public Service Company	Yes	AZPS agrees with the definitions for Bulk Power System and Reliability Standard. However, AZPS does not agree with the the definition of Reliable Operation because this includes a Cyber Security Incident. The scope of the Cyber Security Incident can be unlimited and can take multiple facilities out in a single incident. A cyber incident is beyond a normal operation or state and has further reaching impacts than operating limits, cascading failures, etc. It will be almost impossible or at best difficult to classify any operating

Organization	Yes or No	Question 1 Comment
		condition as “Reliable Operation” under this scenario.
Response: Thank you for your comments and your support of this project. The definition for Reliable Operation matches the statutory language found in Section 215 of the Federal Power Act, and cybersecurity incident cannot be removed without making a substantive change to the definition. Further, these definitions will apply to terms that are currently capitalized in any Reliability Standard. Reliable Operation is not currently capitalized in any of the Board-approved standards. However, capitalization/adoption of the definition will be considered during the next standards development project involving the requirement.		
Occidental Energy Ventures Corp.	Yes	Occidental Energy Ventures, Corp. (“OEVC”) agrees that the exact FPA language should be incorporated into the NERC Glossary. We appreciate the project team’s intent to add language to replace the cumbersome legal terminology, but believe that the FPA content was carefully crafted by the U.S. Congress - and the clarifications subtly modify their intent. For the same reason, the statutory terms incorporated into NERC’s Rules of Procedure (ROP) must be updated as well. We understand that the ROP was not in-scope for this exercise, but NERC must commit to a correction to eliminate all confusion. There is precedence where parallel modifications to the ROP have been made to align with a NERC project, so it does not seem that there should be a major barrier to this action.Although far more difficult, it would be beneficial for the project team make a firm statement back to NERC Leadership that the maintenance of two sets of definitions is problematic at best. This introduces uncertainty into the regulatory equation as industry stakeholders have no idea which terms will be used to monitor their compliance with reliability regulations. In fact, there is nothing that stops NERC and/or FERC to pick and choose when a definition applies - as captured in this paragraph in FERC Order 693:76. However, we disagree with NERC, APPA and NRECA that there is no intentional distinction between Bulk-Power System and bulk electric system. NRECA states that “[W]here Congress borrows terms of art in which are accumulated the legal tradition and meaning of centuries of practice, it

Organization	Yes or No	Question 1 Comment
		presumably knows and adopts the cluster of ideas that were attached to each borrowed word in the body of learning from which it was taken." In this instance, however, Congress did not borrow the term of art - bulk electric system - but instead chose to create a new term, Bulk-Power System, with a definition that is distinct from the term of art used by industry. In particular, the statutory term does not establish a voltage threshold limit of applicability or configuration as does the NERC definition of bulk electric system. Instead, section 215 of the FPA broadly defines the Bulk-Power System as "facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof) [and] electric energy from generating facilities needed to maintain transmission system reliability." Therefore, the Commission confirms its statements in the NOPR that the Bulk-Power System reaches farther than those facilities that are included in NERC's definition of the bulk electric system.In our view, this interpretation of the FPA essentially leaves no limits to FERC's oversight provide a link to Bulk-Power System reliability is made. In fact, the Commission essentially stated this was the case in their recent approval of the definition of the BES. Although this flexibility may make sense to the regulatory bodies so they may adapt their scope as new reliability threats are discovered, it greatly increases the industry's uncertainty. After all if a violation can be found to "BPS Reliability" that is nowhere to be found in a NERC Reliability Standard, then we have no idea where to prioritize our scarce resources. This only adds risk to the reliability of the wide-area power system - no matter what it is called.
Response: Thank you for your comments and your support of this project. Any future updates to the ROP will be addressed through a separate project.		
Rayburn Country Electric Cooperative	Yes	I belive in addition to Bulk Power System a clear definition of "Local Distribution" is necessary to complete the big picture.We have Bulk Power

Organization	Yes or No	Question 1 Comment
		System, Bulk Electric System both of which mention “Local Distribution”. But Local Distribution is not yet officially defined. If it is not defined now, it will need to be defined eventually.
Response: Thank you for your comments. Any future amendments to the Glossary would be considered in a future project.		
Flathead Electric Cooperative, Inc.	Yes	The inclusion of Bulk-Power System appears to be without any explanation of th erelation of the term to the Bulk Electric System. A glossary definition that ignores this obvious inconssistncy does not seem to add value. There should at least be an acknowledgment of the interplay somehow.
Response: Thank you for your comments. The BES is a subset of the BPS, and FERC has provided more guidance on facilities that comprise the BES in Order No. 773.		
Northeast Utilities	Yes	NU suggests that the first sentence of the definition for “Reliability Standard” should be re-worded to eliminate the phrase “under this section” since this phrase is ambiguous. The suggested changes should be as follows:”Reliability Standard” means a requirement, approved by the Commission (under Section 215 of the Federal Power Act), to provide for reliable operation of the bulk-power system. The term...
Response: Thank you for your comments. In order to clarify the meaning of “Commission” and “section” in the definition for Reliability Standard, language is being added to reflect that in the United States FERC approves standards under Section 215 of the Federal Power Act. However, for other jurisdictions, the applicable governmental authority approves or recognizes standards.		
Massachusetts Attorney General	Yes	I have a problem with the Reliable Operation definition due to the words "will not occur as a result of a sudden disturbance" with no caveats at all. If it said "will not occur within design parameters as a result of a sudden disturbance" with design parameters pointing to N-1-1 conditions, or some such construction, my objection would disappear, but as written, it is too absolute and will require reliability even under the most distressed

Organization	Yes or No	Question 1 Comment
		conditions, conditions which the system was not and should not be designed for.
Response: Thank you for your comments. The definitions currently match the statutory language in Section 215 of the Federal Power Act. Any future amendments to the Glossary would be considered in a future project.		
Idaho Power Company	Yes	Having separate definitions for BPS and BES still creates an element of confusion but amending the initial draft to now match the statutory language found in Section 215 of the FPA eliminates additional confusion.
Response: Thank you for your comments. The BES is a subset of the BPS, and FERC has provided more guidance on facilities that are part of the BES in Order No. 773.		
Independent Electricity System Operator	Yes	The IESO has concerns with the proposed definition of Reliability Standard. This definition is is virtually the same as the current definition in the NERC Rules of Procedure in terms of content, except that it now adds that a standard is "approved by the Commission under this section", and ignores the recognition of other jurisdictions by excluding the original wording that "A reliability standard shall not be effective in the United States until approved by the FERC and shall not be effective in other jurisdictions until made or allowed to become effective by the applicable governmental authority." We believe a reliability standard, in its general definition, establishes a set of technical or performance requirements to measure the reliability of the bulk power system (and it is something NERC defines and approves), and that it becomes mandatory and effective when approved by the applicable regulatory authority in each jurisdiction. We recommend that ,if NERC is to include the definition of Reliability Standard in its glossary of terms, it should use the definition in its Rules of Procedure instead.
Response: Thank you for your comments. In order to clarify the meaning of "Commission" and "section" in the definition for Reliability Standard, language is being added to reflect that in the United States FERC approves standards under Section 215 of the		

Organization	Yes or No	Question 1 Comment
Federal Power Act. However, for other jurisdictions, the applicable governmental authority approves or recognizes standards.		
American Electric Power	Yes	We are confused by the de-capitalization of Reliable Operation and Bulk-Power System in this most recent draft. What is the intent of doing so? In the previous draft, it was more clear that the definitions were interdependent. That is no longer the case. Though we previously voted in the affirmative, this most recent change has driven our decision to vote negative this comment period.Regarding the proposed definition of "Bulk-Power System", AEP believes it is misplaced to emphasize electric energy rather than generation facilities in B), and propose using "generation facilities producing the electric energy needed...".With regard to the definition of "Reliability Standard", AEP once again recommends using a different word in place of the lower case "requirement" to avoid confusing it with the defined term "Requirement". In addition, NERC may want to consider including planning and maintenance as part of this definition, going beyond operations only.
Response: Thank you for your comments. The current definitions match the statutory language found in Section 215 of the Federal Power Act. Also, the terms Reliable Operation and Bulk-Power System as referenced in the definitions will be capitalized once the Board has adopted both terms.		
City of Tallahassee	Yes	TAL is uncomfortable with the potential for unintended consequences resulting from the wording of the proposed BPS definition. 'Electric energy from generation facilities needed to maintain transmission system reliability' does not specify which portion of the generator output is to support reliability, versus that which is designated to serve customer load. It is unknown how entities could differentiate.
Response: Thank you for your comments. The current definitions match the statutory language found in Section 215 of the Federal Power Act.		

Organization	Yes or No	Question 1 Comment
Seminole Electric	Yes	Seminole reasons that the SDT has taken an incorrect step by "lower-casing" the previously capitalized, and therefore defined terms, which are utilized to define the three additional terms cited in Section 215(a) of the Federal Power Act (FPA), i.e., Bulk-Power System, Reliability Standard, and Reliable Operation. The NERC SDT originally proposed definitions which included capitalized terms in the initial ballot for this Project, and then the NERC SDT proposed lower-casing those terms in this Successive Ballot action. Seminole acknowledges that when Congress passed Title XII of the Energy Policy Act of 2005 (EPAct) which included these terms, that Congress did not capitalize the terms at issue. Part of the reason these terms were not capitalized was because FERC via NERC had not defined and approved some of these terms until 2007. With that said, Seminole reasons that the NERC STD should only add definitions to the NERC Glossary that are: (1) effective, (2) meet the intent of Congress, and (3) are clear and unambiguous and provide due process to the regulated community.1.EffectiveThe three terms being added are constructed with words that are now undefined. Seminole reasons that the lower-casing of such words, which now breaks their reference to NERC defined terms, diminishes the effectiveness of the three terms being proposed for addition. If these terms are not clearly defined, then NERC will not be able to enforce these definitions for reasons cited later in these comments. This action appears to be purely ministerial - add three terms that Congress directed to be added, even if the terms are not clearly defined. Seminole reasons that Congress would have wanted NERC to have definitions that could be enforced and utilized. Seminole does not believe these definitions will be effective additions to the Glossary and that the NERC SDT should recapitalize the NERC defined terms within the proposed terms to be added to the NERC Glossary in this Project.2.Intent of CongressIf the three terms being added - Bulk-Power System, Reliability Standard, and Reliable Operation, are approved as proposed, Seminole reasons that Congress'

Organization	Yes or No	Question 1 Comment
		intent will not be met. For example, for the term "Reliable Operation," the NERC STD has lower-cased the terms "elements," "cascading," "bulk-power system," and "cybersecurity incident." Per the NERC Rules of Procedure, if these terms are not capitalized, then these terms do not refer to NERC defined terms. This instruction has been conveyed in multiple NERC documents. Therefore, NERC is specifically saying for example, that the word "bulk-power system" listed in the definition for Reliable Operation does not refer to the defined term "Bulk-Power System" which is being added by this exact Project. Seminole does not believe this was the intent of Congress. Seminole reasons that the NERC SDT should capitalize those terms that are already defined in the NERC Glossary as Seminole believes that such action would be more in line with the intent of Congress.3.Clear, Unambiguous, and Provide Due Process In this action, the NERC SDT has lower-cased such words as "facilities" and "elements." These are currently defined terms in the NERC Glossary. As stated previously, if these terms are not capitalized, then these terms are explicitly not referencing the defined terms. If such is the case, then the terms being defined are not clear and unambiguous and Seminole does not reason that FERC will approve such vague definitions even if they are directly from Congress. As you are aware, there must be due process provided to the regulated industry via the Administrative Procedure Act. Seminole reasons that the NERC SDT, in an effort to provide due process and clarity, referenced the NERC defined terms that make up the proposed definitions. Now, the NERC SDT has removed that clarity from the proposed definition. Seminole believes that the capitalized terms, the defined terms, should once again be added to the definitions. If the NERC SDT does not capitalize these terms, Seminole does not believe that such definitions will pass FERC approval under this reasoning.
Response: Thank you for your comments. The current definitions match the statutory language found in Section 215 of the Federal Power Act. Also, the terms Reliable Operation and Bulk-Power System as referenced in the definitions will be capitalized		

Organization	Yes or No	Question 1 Comment
once the Board has adopted both terms.		
Modesto Irrigation District	Yes	I believe it is critical that the phrase "and NERC Reliability Standards," be inserted after the phrase "stability limits" in the definition of "Reliable Operation" paragraph. Otherwise, the "Reliable Operation" paragraph you are proposing to insert into the NERC Glossary of Terms, may in itself override the entire set of NERC Reliability Standards.Also, for clarity, I would suggest that the word "Commission", as used in the "Reliability Standard" definition paragraph, be clearly defined as "Federal Energy Regulatory Commission", if that is the intent.Thank you.
Response: Thank you for your comments. The definition for Reliable Operation matches the statutory definition found in Section 215 of the Federal Power Act. Inserting "and NERC Reliability Standards" would be a substantive change to the FERC directive. However, clarifying language will be added to explain in the United States, Commission means FERC. For other jurisdictions, the applicable governmental authority approves or recognizes the Reliability Standard.		
HHWP	Yes	The confusion remains between the meaning of "BPS" and BES. If BPS=BES, the glossary of terms definitions for both should be the same. If BPSâ‰ BES, then the difference in meaning should be included as part of the glossary definition of BPS. The proposed BPS definition remains unclear and therefore should not be used in the glossary.The definition of "Reliable Operation" ignores the one of the two aspects of reliability that was identified in NERC's December 2007 Reliability Concepts document. The definition appears only to address interconnection integrity and does not include the reliability effects arising from failure a protect equipment that can impact system reliability is the operating, but not real-time horizon.
Response: Thank you for your comments. The definitions being added match the statutory language found in Section 215 of the Federal Power Act. The definition for BPS is being added to address a FERC directive from Order No. 693. BES does not equate to the BPS, and the BES is a subset of the BPS. Further, the Commission has also provided guidance on what facilities comprise the BES in Order No. 773.		

Organization	Yes or No	Question 1 Comment
Georgia Transmission Corporation	Yes	The introduction to the NERC Glossary states "This Glossary lists each term that was defined for use in one or more of NERC's continent-wide or Regional Reliability Standards...". Terms are added to the glossary as they are introduced in the development or revision of a standard; they are not added speculatively in anticipation that they will be used later, or retroactively to modify the meaning of a standard. Currently, out of all 1,663 requirements in the latest VRF Standards Applicability Matrix, only one requirement, PRC-006-SERC-01 R1 uses the term "BPS". Consequently, this capitalized term BPS was not introduced during the development of PRC-006-SERC-01 R1, and GTC recommends this item be added to the "Issues Database" for further review on how utilizing this proposed statutory definition of BPS might change the meaning of this affected standard.As mentioned in paragraph 1894 listed in the SAR, "the Reliability Standards refer to the bulk electric system, which is also defined in the glossary." Inserting the proposed statutory definitions without modification could have a negative impact and conflicting circular references between the two terms BPS and BES when the statutory definition for the term "Reliability Standard" only captures the term "bps". Again, this would be inconsistent with the stated purpose of the NERC Glossary identified above and contradictory to FERC's common statement "...the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."Accordingly, GTC has concern there is a potential risk of expanding jurisdictional exposure to Reliability Standards once the statutory term "BPS" is approved within the NERC Glossary. GTC fears that uninformed future drafting team members may begin to reference BPS in future revisions of requirements that are currently limited to the BES, because it would be a term available within the NERC Glossary but may not recall FERC's documented statement "....the Reliability Standards refer to the bulk electric system...". GTC proposes the following note be added to the proposed definition to control this unintended, yet probable

Organization	Yes or No	Question 1 Comment
		consequence: o “Bulk-Power System” means, A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy. Note - FERC has directed the inclusion of the statutory definition of Bulk-Power System to the NERC Glossary, but highlights that the Reliability Standards refer to the bulk electric system, which is also defined in the glossary.GTC also has concerns with the reference to lower case “bps” within the statutory term “Reliability Standard” if approved within the NERC Glossary. Specifically, FERC has praised the clarity of the revised definition of BES and also clarified that Reliability Standards refer to the bulk electric system. The NERC defined term within the NERC glossary should be consistent with FERC and the industry’s common understanding that Reliability Standards refer to the bulk electric system. Using the statutory definition without modification, only adds more confusion because lower case term “bps” does not equal BES, and would now introduces 3 terms that people will begin to ponder (BPS, BES, or bps). Therefore, GTC proposes the following definition for Reliability Standard: o “Reliability Standard” means a requirement, approved by the Commission, to provide for Reliable Operation of the Bulk Electric System. The term includes requirements for the operation of existing Bulk Electric System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the Bulk Electric System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.
Response: Thank you for your comments. The definitions proposed match the statutory definition in Section 215 of the Federal Power Act. Also, this project will address the FERC directive Order No. 693 to adopt the statutory definitions of Bulk-Power System, Reliability Standard, and Reliable Operation. Further, these definitions will apply to terms that are currently capitalized		

Organization	Yes or No	Question 1 Comment
in any Reliability Standard. Where a Reliability Standard includes a non-capitalized term, capitalization will be considered during the next standards development project involving the requirement. Also, the terms Reliable Operation and Bulk-Power System as referenced in the definitions will be capitalized once the Board has adopted both terms.		
Canadian Electricity Association	Yes	CEA's comments focus specifically on the proposal for the definition of "Reliability Standard" in the NERC Glossary of Terms to match the language in the U.S. Federal Power Act verbatim. CEA has two concerns with the proposal. First and foremost, CEA is concerned that the definition would not be applicable to, workable for or respectful of registered entities in Canada. The proposed definition does not capture and convey that many Canadian provincial government authorities, separate and apart from any FERC approval process, approve Reliability Standards or allow Reliability Standards to take effect in their respective jurisdictions. CEA does not believe it is appropriate for a term that is such a fundamental component of the broader North American electric reliability regime and lexicon to be defined in such a way that is applicable to only one jurisdiction. CEA respectfully requests that clarifying language be added to the proposed definition of "Reliability Standard" so that the definition correctly acknowledges how Reliability Standards are approved or recognized in jurisdictions other than the United States. Such modification will ensure that the definition in the Glossary is workable for all of NERC's registered entities in North America. CEA believes that such modification would not represent a substantive change to the proposed definition of "Reliability Standard," given that it would not modify the definition of what Reliability Standards are comprised of or what they seek to achieve. Accordingly, such non-substantive modification would not represent a deviation from FERC's directive, but rather enables NERC to comply with the directive in an equally efficient and effective manner, that ensures total accuracy and precision in the definition.In addition, CEA notes that other clarifying modifications are necessary in the proposed definition of "Reliability Standard." The word "Commission" and phrase "under this section" do not

Organization	Yes or No	Question 1 Comment
		correspond to other defined terms in the NERC Glossary. As such, their inclusion would cause the definition of "Reliability Standard" in the Glossary to be confusing and lacking coherence. CEA believes that these words should be modified, consistent with the other modification suggested above.
Response: Thank you for your comments. In order to clarify the meaning of "Commission" and "section" in the definition for Reliability Standard, language is being added to reflect that in the United States FERC approves standards under Section 215 of the Federal Power Act. However, for other jurisdictions, the applicable governmental authority approves or recognizes standards.		

END OF REPORT

Implementation Plan
2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Requested Approvals
It is requested that the following definitions be approved for addition to the NERC Glossary of Terms used in Reliability Standards:

- "Bulk-Power System" means, A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

- "Reliability Standard" means a requirement, approved by the United States Federal Energy Regulatory Commission under this Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk-Power System]. The term includes requirements for the operation of existing bulk-power system [Bulk-Power System] facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk-Power System], but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.

- "Reliable Operation" means operating the elements of the bulk-power system [Bulk-Power System] within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.

The words "bulk-power system" are found in the definitions for "Reliability Standard" and "Reliable Operation." Also the words "reliable operation" appear in the "Reliability Standard" definition. These terms will be capitalized before the definitions are added to the Glossary, as indicated by the capitalized term in brackets. The terms are not currently capitalized or adopted because the Board of Trustees has yet to adopt them as Glossary Terms.

These definitions will apply to terms that are currently capitalized in any Reliability Standard. Where a Reliability Standard includes a non-capitalized term, capitalization will be considered during the next standards development project involving the requirement.

Requested Retirements

No Reliability Standards or definitions are requested to be retired with the approval of the addition of the definitions for Bulk-Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards.

Prerequisite Approvals

No Reliability Standard or definition is under development that must be completed or implemented before the definitions for Bulk-Power System, Reliability Standard, and Reliable Operation can be added to the NERC Glossary of Terms used in Reliability Standards.

Background

In Paragraph 1894 of the Federal Energy Regulatory Commission (FERC) Order 693, the Commission directed the Electric Reliability Organization to include the statutory definitions of Bulk-Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards:

> "1894. The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

The statutory definitions for Bulk-Power System, Reliability Standard, and Reliable Operation are contained in Section 215 of the Federal Power Act (16 U.S.C. § 824o). Inclusion of the statutory definitions for Bulk-Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms will address three outstanding Commission directives.

Effective Date

The definitions of Bulk-Power System, Reliability Standard, and Reliable Operation shall be added to the NERC Glossary of Terms used in Reliability Standards effective upon applicable regulatory approval.

Implementation Plan
2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Requested Approvals
It is requested that the following definitions be approved for addition to the NERC Glossary of Terms used in Reliability Standards:

- "Bulk-Power System" means, A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

- "Reliability Standard" means a requirement, approved by the ~~Commission~~ United States Federal Energy Regulatory Commission under this ~~section~~Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk-Power System]. The term includes requirements for the operation of existing bulk-power system [Bulk-Power System] facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk-Power System], but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.

- "Reliable Operation" means operating the elements of the bulk-power system [Bulk-Power System] within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.

The words "bulk--power system" are found in the definitions for "Reliability Standard" and "Reliable Operation." Also the words "reliable operation" appear in the "Reliability Standard" definition. These terms will be capitalized before the definitions are added to the Glossary, as indicated by the capitalized term in brackets. The terms are not currently capitalized or adopted because the Board of Trustees has yet to adopt them as Glossary Terms.

These definitions will apply to terms that are currently capitalized in any Reliability Standard. Where a Reliability Standard includes a non-capitalized term, capitalization will be considered during the next standards development project involving the requirement.

~~Since the aforementioned definitions listed include cross-references to each other, those terms will be capitalized before being added to the Glossary. The terms are not currently capitalized or adopted because the Board of Trustees has yet to approve the any of the terms.~~

Requested Retirements

No Reliability Standards or definitions are requested to be retired with the approval of the addition of the definitions for Bulk-Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards.

Prerequisite Approvals

No Reliability Standard or definition is under development that must be completed or implemented before the definitions for Bulk-Power System, Reliability Standard, and Reliable Operation can be added to the NERC Glossary of Terms used in Reliability Standards.

Background

In Paragraph 1894 of the Federal Energy Regulatory Commission (FERC) Order 693, the Commission directed the Electric Reliability Organization to include the statutory definitions of Bulk-Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms used in Reliability Standards:

> "1894. The Commission directs the ERO to modify the glossary through the Reliability Standards development process to include the statutory definitions of the terms Bulk-Power System, Reliable Operation and Reliability Standard. However, this determination does not negate our discussion in the Applicability section of the Final Rule. While the glossary should be revised to include the statutory definition of Bulk-Power System, the Reliability Standards refer to the bulk electric system, which is also defined in the glossary."

The statutory definitions for Bulk-Power System, Reliability Standard, and Reliable Operation are contained in Section 215 of the Federal Power Act (16 U.S.C. § 824o). Inclusion of the statutory definitions for Bulk-Power System, Reliability Standard, and Reliable Operation in the NERC Glossary of Terms will address three outstanding Commission directives.

Effective Date

The definitions of Bulk-Power System, Reliability Standard, and Reliable Operation shall be added to the NERC Glossary of Terms used in Reliability Standards effective upon applicable regulatory approval.

Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

Development Steps Completed

1. On May 10, 2012, the Standards Committee (SC) authorized NERC posting a Standard Authorization Request (SAR) for adding the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms for a 45-day comment period. The SAR was the actual document posted for the formal comment and initial ballot period.
2. Phase 1 Glossary Updates were posted for a 45-day formal comment period and initial ballot from June 19, 2012 through August 2, 2012. Stakeholders were asked to provide feedback on the Glossary Updates and associated documents through an electronic comment form. There were 60 sets of comments, including comments from approximately 159 different people from approximately 104 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.
3. The initial ballot was conducted during the final 10 days of the formal comment period, from July 24, 2012 to August 2, 2012. The initial ballot was unsuccessful. A quorum was reached at 83.11% participation from the 373 registered entities in the ballot pool. The weighted segment vote for the definitions was only 54.16%. Based on the comments received, the proposed definitions were amended to match the statutory language found in Section 215 of the Federal Power Act.
4. Another formal comment and successive ballot was posted from February 21, 2013 to March 22, 2013. There were 29 sets of comments, including comments from approximately 72 different people from approximately 44 companies representing all of the 10 Industry Segments. A quorum was met with 77.48% of the 373 registered entities voting. The ballot was successful with 84.27% of the industry voting in favor of the new definitions.

Description of Current Draft

This is the recirculation ballot for adding the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms. The statutory definitions will be posted for a 10-day recirculation ballot.

Anticipated Actions	Anticipated Date

Recirculation Ballot	April 2013
BOT adoption	May 2013

Effective Dates

The definitions of Bulk Power System, Reliability Standard, and Reliable Operation shall be added to the NERC Glossary of Terms used in Reliability Standards effective upon applicable regulatory approval.

Version History

Version	Date	Action	Change Tracking
N/A	TBD	Addition of the definitions of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards.	N/A

Definitions of Terms Used in Standard

This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.

"Bulk-Power System" means, A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

"Reliability Standard" means a requirement, approved by the the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk-Power System]. The term includes requirements for the operation of existing bulk-power system [Bulk-Power

System] facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk-Power System], but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.

"Reliable Operation" means operating the elements of the bulk-power system [Bulk-Power System] within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.

The words "bulk-power system" are found in the definitions for "Reliability Standard" and "Reliable Operation." Also the words "reliable operation" appear in the "Reliability Standard" definition. These terms will be capitalized before the definitions are added to the Glossary, as indicated in the definitions by the capitalized term in brackets. The terms are not currently capitalized or adopted because the Board of Trustees has yet to adopt them as Glossary Terms.

Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

Development Steps Completed

1. On May 10, 2012, the Standards Committee (SC) authorized NERC posting a Standard Authorization Request (SAR) for adding the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms for a 45-day comment period. The SAR was the actual document posted for the formal comment and initial ballot period.
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3. The initial ballot was conducted during the final 10 days of the formal comment period, from July 24, 2012 to August 2, 2012. The initial ballot was unsuccessful. A quorum was reached at 83.11% participation from the 373 registered entities in the ballot pool. The weighted segment vote for the definitions was only 54.16%. Based on the comments received, the proposed definitions were amended to match the statutory language found in Section 215 of the Federal Power Act.
4. Another formal comment and successive ballot was posted from February 21, 2013 to March 22, 2013. There were 29 sets of comments, including comments from approximately 72 different people from approximately 44 companies representing all of the 10 Industry Segments. A quorum was met with 77.48% of the 373 registered entities voting. The ballot was successful with 84.27% of the industry voting in favor of the new definitions.

Description of Current Draft

This is the ~~second posting and~~ recirculation ballot for adding the statutory definitions of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms. The statutory definitions will be posted for a 10~~30~~-day ~~formal comment period, with a successive~~recirculation ballot. ~~during the final 10 days of that comment period.~~

Anticipated Actions	Anticipated Date

~~30-day Formal Comment Period with Parallel Successive Ballot~~	~~February March 2013~~
Recirculation Ballot	April 2013
BOT adoption	May 2013

Effective Dates

The definitions of Bulk Power System, Reliability Standard, and Reliable Operation shall be added to the NERC Glossary of Terms used in Reliability Standards effective upon applicable regulatory approval.

Version History

Version	Date	Action	Change Tracking
N/A	TBD	Addition of the definitions of Bulk Power System, Reliability Standard, and Reliable Operation to the NERC Glossary of Terms used in Reliability Standards.	N/A

Definitions of Terms Used in Standard

This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.

"Bulk-Power System" means, A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

"Reliability Standard" means a requirement, approved by the ~~Commission~~ the United States Federal Energy Regulatory Commission under ~~this section~~Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other

jurisdictions, to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk-Power System]. The term includes requirements for the operation of existing bulk-power system [Bulk-Power System] facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk-Power System], but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.

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The words "bulk--power system" are found in the definitions for "Reliability Standard" and "Reliable Operation." Also the words "reliable operation" appear in the "Reliability Standard" definition. These terms will be capitalized before the definitions are added to the Glossary, as indicated in the definitions by the capitalized term in brackets. The terms are not currently capitalized or adopted because the Board of Trustees has yet to adopt them as Glossary Terms.

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NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standards Announcement

Project 2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Recirculation Ballot is now open through 8 p.m. Monday, April 29, 2013

Now Available

A recirculation ballot for Phase 1 of the Glossary Updates for Statutory Definitions is open through **8 p.m. Eastern on Monday, April 29, 2013**.

Background information for this project can be found on the project page.

Instructions

In the recirculation ballot, votes are counted by exception. Only members of the ballot pool may cast a ballot; all ballot pool members may change their previously cast votes. A ballot pool member who failed to cast a ballot during the last ballot window may cast a ballot in the recirculation ballot window. If a ballot pool member does not participate in the recirculation ballot, that member's vote cast in the previous ballot will be carried over as that member's vote in the recirculation ballot.

Members of the ballot pool associated with this project may log in and submit their vote for the Glossary Updates for Statutory Definitions by clicking here.

Next Steps

Voting results will be posted and announced after the ballot window closes. If approved, the Glossary Updates for Statutory Definitions will be submitted to the Board of Trustees for adoption and then filed with the appropriate regulatory authorities.

Standards Development Process

The Standards 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 Wendy Muller, Standards Development Administrator, at wendy.muller@nerc.net or at 404-446-2560.

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NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standards Announcement

Project 2012-08.1 Phase 1 of Glossary Updates: Statutory Definitions

Recirculation Ballot Results

Now Available

A recirculation ballot for Phase 1 of the Glossary Updates for Statutory Definitions concluded at **8 p.m. Eastern on Monday, April 29, 2013**.

Voting statistics are listed below, and the Ballot Results page provides a link to the detailed results for the recirculation ballot.

Approval
Quorum: 80.70 % Approval: 88.15 %

Background information for this project can be found on the project page.

Next Steps

The Glossary Updates for Statutory Definitions will be presented to the Board of Trustees for adoption and then filed with the appropriate regulatory authorities.

Standards Development Process

The Standards 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, Reliability Standards Analyst, at monica.benson@nerc.net or at 404-446-2560.

North American Electric Reliability Corporation
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Suite 600, North Tower
Atlanta, GA 30326
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Ballot Results	
Ballot Name:	Project 2012-08.1 Phase 1 Glossary Updates February 2013
Ballot Period:	4/18/2013 - 4/29/2013
Ballot Type:	recirculation
Total # Votes:	301
Total Ballot Pool:	373
Quorum:	**80.70 % The Quorum has been reached**
Weighted Segment Vote:	88.15 %
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.	101	1	64	0.901	7	0.099	9	21
2 - Segment 2.	9	0.7	7	0.7	0	0	1	1
3 - Segment 3.	82	1	55	0.859	9	0.141	5	13
4 - Segment 4.	29	1	19	0.864	3	0.136	0	7
5 - Segment 5.	79	1	54	0.885	7	0.115	6	12
6 - Segment 6.	55	1	35	0.897	4	0.103	4	12
7 - Segment 7.	0	0	0	0	0	0	0	0
8 - Segment 8.	8	0.3	2	0.2	1	0.1	0	5
9 - Segment 9.	2	0.1	0	0	1	0.1	0	1
10 - Segment 10.	8	0.6	6	0.6	0	0	2	0
Totals	**373**	**6.7**	**242**	**5.906**	**32**	**0.794**	**27**	**72**

Individual Ballot Pool Results

Segment	Organization	Member	Ballot	Comments
1	Ameren Services	Kirit Shah	Affirmative	
1	American Electric Power	paul B johnson	Negative	
1	American Transmission Company, LLC	Andrew Z Pusztai	Affirmative	
1	Arizona Public Service Co.	Robert Smith	Negative	
1	Associated Electric Cooperative, Inc.	John Bussman	Affirmative	
1	Austin Energy	James Armke	Affirmative	
1	Avista Corp.	Scott J Kinney		
1	Balancing Authority of Northern California	Kevin Smith	Affirmative	

1	BC Hydro and Power Authority	Patricia Robertson	Abstain	000255
1	Beaches Energy Services	Joseph S Stonecipher		
1	Bonneville Power Administration	Donald S. Watkins	Affirmative	
1	Brazos Electric Power Cooperative, Inc.	Tony Kroskey		
1	Bryan Texas Utilities	John C Fontenot	Affirmative	
1	CenterPoint Energy Houston Electric, LLC	John Brockhan	Abstain	
1	Central Maine Power Company	Joseph Turano Jr.	Affirmative	
1	City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	Chang G Choi	Affirmative	
1	Clark Public Utilities	Jack Stamper	Affirmative	
1	Cleco Power LLC	Danny McDaniel	Affirmative	
1	Colorado Springs Utilities	Paul Morland	Affirmative	
1	Consolidated Edison Co. of New York	Christopher L de Graffenried	Affirmative	
1	CPS Energy	Richard Castrejana		
1	Dairyland Power Coop.	Robert W. Roddy	Abstain	
1	Dayton Power & Light Co.	Hertzel Shamash		
1	Dominion Virginia Power	Michael S Crowley	Affirmative	
1	Duke Energy Carolina	Douglas E. Hils	Affirmative	
1	El Paso Electric Company	Dennis Malone	Affirmative	
1	Empire District Electric Co.	Ralph F Meyer		
1	Entergy Services, Inc.	Edward J Davis		
1	FirstEnergy Corp.	William J Smith	Affirmative	
1	Florida Keys Electric Cooperative Assoc.	Dennis Minton		
1	Florida Power & Light Co.	Mike O'Neil	Affirmative	
1	Gainesville Regional Utilities	Richard Bachmeier	Affirmative	
1	Georgia Transmission Corporation	Jason Snodgrass	Negative	
1	Great River Energy	Gordon Pietsch	Affirmative	
1	Hoosier Energy Rural Electric Cooperative, Inc.	Bob Solomon	Affirmative	
1	Hydro One Networks, Inc.	Ajay Garg	Negative	
1	Hydro-Quebec TransEnergie	Bernard Pelletier	Abstain	
1	Idaho Power Company	Molly Devine	Affirmative	
1	Imperial Irrigation District	Tino Zaragoza		
1	International Transmission Company Holdings Corp	Michael Moltane	Affirmative	
1	JEA	Ted Hobson		
1	KAMO Electric Cooperative	Walter Kenyon		
1	Kansas City Power & Light Co.	Michael Gammon	Affirmative	
1	Lakeland Electric	Larry E Watt	Affirmative	
1	Lee County Electric Cooperative	John W Delucca		
1	LG&E Energy Transmission Services	Bradley C. Young		
1	Lincoln Electric System	Doug Bantam	Affirmative	
1	Long Island Power Authority	Robert Ganley	Negative	
1	Lower Colorado River Authority	Martyn Turner	Affirmative	
1	Manitoba Hydro	Joe D Petaski	Abstain	
1	MEAG Power	Danny Dees	Affirmative	
1	MidAmerican Energy Co.	Terry Harbour	Affirmative	
1	Muscatine Power & Water	Andrew J Kurriger		
1	National Grid USA	Michael Jones	Affirmative	
1	Nebraska Public Power District	Cole C Brodine		
1	New York Power Authority	Bruce Metruck	Affirmative	
1	New York State Electric & Gas Corp.	Raymond P Kinney		
1	Northeast Utilities	David Boguslawski	Affirmative	
1	NorthWestern Energy	John Canavan	Affirmative	
1	NStar Gas and Electric	John Robertson		
1	Ohio Valley Electric Corp.	Robert Mattey	Negative	
1	Oklahoma Gas and Electric Co.	Marvin E VanBebber	Abstain	
1	Omaha Public Power District	Doug Peterchuck	Affirmative	
1	Oncor Electric Delivery	Jen Fiegel	Affirmative	
1	Orlando Utilities Commission	Brad Chase	Affirmative	
1	Pacific Gas and Electric Company	Bangalore Vijayraghavan		
1	PacifiCorp	Ryan Millard	Affirmative	
1	PECO Energy	Ronald Schloendorn	Affirmative	
1	Platte River Power Authority	John C. Collins	Affirmative	
1	Portland General Electric Co.	John T Walker	Affirmative	
1	Potomac Electric Power Co.	David Thorne	Affirmative	
1	PowerSouth Energy Cooperative	Larry D Avery	Affirmative	
1	PPL Electric Utilities Corp.	Brenda L Truhe	Affirmative	

1	Progress Energy Carolinas	Brett A. Koelsch		
1	Public Service Company of New Mexico	Laurie Williams	Abstain	
1	Public Service Electric and Gas Co.	Kenneth D. Brown	Affirmative	
1	Public Utility District No. 1 of Okanogan County	Dale Dunckel	Affirmative	
1	Public Utility District No. 2 of Grant County, Washington	Rod Noteboom		
1	Puget Sound Energy, Inc.	Denise M Lietz	Abstain	
1	Rochester Gas and Electric Corp.	John C. Allen	Affirmative	
1	Sacramento Municipal Utility District	Tim Kelley	Affirmative	
1	Salt River Project	Robert Kondziolka	Affirmative	
1	Santee Cooper	Terry L Blackwell	Negative	
1	Seattle City Light	Pawel Krupa	Affirmative	
1	Sierra Pacific Power Co.	Rich Salgo	Abstain	
1	Snohomish County PUD No. 1	Long T Duong	Affirmative	
1	South California Edison Company	Steven Mavis	Affirmative	
1	Southern Company Services, Inc.	Robert A. Schaffeld	Affirmative	
1	Southern Illinois Power Coop.	William Hutchison	Affirmative	
1	Southwest Transmission Cooperative, Inc.	John Shaver	Affirmative	
1	Sunflower Electric Power Corporation	Noman Lee Williams	Affirmative	
1	Tennessee Valley Authority	Howell D Scott	Affirmative	
1	Trans Bay Cable LLC	Steven Powell	Affirmative	
1	Tri-State G & T Association, Inc.	Tracy Sliman	Affirmative	
1	Tucson Electric Power Co.	John Tolo	Affirmative	
1	Turlock Irrigation District	Esteban Martinez	Affirmative	
1	United Illuminating Co.	Jonathan Appelbaum	Affirmative	
1	Westar Energy	Allen Klassen	Affirmative	
1	Western Area Power Administration	Brandy A Dunn	Affirmative	
1	Western Farmers Electric Coop.	Forrest Brock		
1	Xcel Energy, Inc.	Gregory L Pieper	Affirmative	
2	BC Hydro	Venkataramakrishnan Vinnakota	Abstain	
2	Electric Reliability Council of Texas, Inc.	Cheryl Moseley	Affirmative	
2	Independent Electricity System Operator	Barbara Constantinescu	Affirmative	
2	ISO New England, Inc.	Kathleen Goodman	Affirmative	
2	Midwest ISO, Inc.	Marie Knox	Affirmative	
2	New Brunswick System Operator	Alden Briggs	Affirmative	
2	New York Independent System Operator	Gregory Campoli		
2	PJM Interconnection, L.L.C.	stephanie monzon	Affirmative	
2	Southwest Power Pool, Inc.	Charles H. Yeung	Affirmative	
3	AEP	Michael E Deloach	Negative	
3	Alabama Power Company	Richard J. Mandes	Affirmative	
3	Ameren Services	Mark Peters	Affirmative	
3	APS	Steven Norris	Negative	
3	Atlantic City Electric Company	NICOLE BUCKMAN	Affirmative	
3	Avista Corp.	Robert Lafferty		
3	BC Hydro and Power Authority	Pat G. Harrington	Abstain	
3	Bonneville Power Administration	Rebecca Berdahl	Affirmative	
3	Central Electric Power Cooperative	Adam M Weber	Abstain	
3	Central Lincoln PUD	Steve Alexanderson	Affirmative	
3	City of Austin dba Austin Energy	Andrew Gallo	Affirmative	
3	City of Bartow, Florida	Matt Culverhouse	Affirmative	
3	City of Farmington	Linda R Jacobson		
3	City of Green Cove Springs	Gregg R Griffin		
3	City of Redding	Bill Hughes	Affirmative	
3	Cleco Corporation	Michelle A Corley	Affirmative	
3	Colorado Springs Utilities	Charles Morgan	Affirmative	
3	ComEd	Bruce Krawczyk	Affirmative	
3	Consolidated Edison Co. of New York	Peter T Yost	Affirmative	
3	Consumers Energy	Richard Blumenstock	Affirmative	
3	CPS Energy	Jose Escamilla		
3	Delmarva Power & Light Co.	Michael R. Mayer	Affirmative	
3	Detroit Edison Company	Kent Kujala	Affirmative	
3	Dominion Resources, Inc.	Connie B Lowe	Affirmative	
3	Duke Energy Carolina	Henry Ernst-Jr		
3	El Paso Electric Company	Tracy Van Slyke	Affirmative	
3	Entergy	Joel T Plessinger	Affirmative	
3	FirstEnergy Energy Delivery	Stephan Kern	Affirmative	

3	Flathead Electric Cooperative	John M Goroski		
3	Florida Municipal Power Agency	Joe McKinney	Affirmative	
3	Florida Power Corporation	Lee Schuster	Affirmative	
3	Georgia Power Company	Danny Lindsey	Affirmative	
3	Georgia System Operations Corporation	Scott McGough	Negative	
3	Great River Energy	Brian Glover	Affirmative	
3	Gulf Power Company	Paul C Caldwell	Affirmative	
3	Hydro One Networks, Inc.	David Kiguel	Negative	
3	Imperial Irrigation District	Jesus S. Alcaraz		
3	JEA	Garry Baker	Affirmative	
3	Kansas City Power & Light Co.	Charles Locke	Affirmative	
3	Kissimmee Utility Authority	Gregory D Woessner	Affirmative	
3	Lakeland Electric	Mace D Hunter	Affirmative	
3	Lincoln Electric System	Jason Fortik	Affirmative	
3	Los Angeles Department of Water & Power	Daniel D Kurowski		
3	Louisville Gas and Electric Co.	Charles A. Freibert	Affirmative	
3	Manitoba Hydro	Greg C. Parent	Abstain	
3	MidAmerican Energy Co.	Thomas C. Mielnik	Affirmative	
3	Mississippi Power	Jeff Franklin	Affirmative	
3	Modesto Irrigation District	Jack W Savage	Affirmative	
3	Municipal Electric Authority of Georgia	Steven M. Jackson	Affirmative	
3	Muscatine Power & Water	John S Bos	Affirmative	
3	Nebraska Public Power District	Tony Eddleman	Affirmative	
3	New York Power Authority	David R Rivera	Affirmative	
3	Niagara Mohawk (National Grid Company)	Michael Schiavone		
3	Northern Indiana Public Service Co.	William SeDoris	Affirmative	
3	Oklahoma Gas and Electric Co.	Gary Clear		
3	Omaha Public Power District	Blaine R. Dinwiddie	Affirmative	
3	Orange and Rockland Utilities, Inc.	David Burke	Affirmative	
3	Orlando Utilities Commission	Ballard K Mutters	Affirmative	
3	Owensboro Municipal Utilities	Thomas T Lyons	Negative	
3	Pacific Gas and Electric Company	John H Hagen	Affirmative	
3	PacifiCorp	Dan Zollner	Affirmative	
3	Pepco Holdings, Inc.	Mark R Jones	Affirmative	
3	Platte River Power Authority	Terry L Baker	Affirmative	
3	PNM Resources	Michael Mertz		
3	Progress Energy Carolinas	Sam Waters		
3	Public Service Electric and Gas Co.	Jeffrey Mueller	Affirmative	
3	Puget Sound Energy, Inc.	Erin Apperson	Abstain	
3	Rutherford EMC	Thomas M Haire	Affirmative	
3	Sacramento Municipal Utility District	James Leigh-Kendall	Affirmative	
3	Salt River Project	John T. Underhill	Affirmative	
3	Santee Cooper	James M Poston	Negative	
3	Seattle City Light	Dana Wheelock	Affirmative	
3	Seminole Electric Cooperative, Inc.	James R Frauen	Negative	
3	Snohomish County PUD No. 1	Mark Oens	Affirmative	
3	South Carolina Electric & Gas Co.	Hubert C Young	Abstain	
3	Tacoma Public Utilities	Travis Metcalfe	Affirmative	
3	Tampa Electric Co.	Ronald L. Donahey		
3	Tennessee Valley Authority	Ian S Grant	Affirmative	
3	Tri-County Electric Cooperative, Inc.	Mike Swearingen	Negative	
3	Tri-State G & T Association, Inc.	Janelle Marriott	Negative	
3	Westar Energy	Bo Jones	Affirmative	
3	Xcel Energy, Inc.	Michael Ibold	Affirmative	
4	American Municipal Power	Kevin Koloini		
4	Blue Ridge Power Agency	Duane S Dahlquist	Affirmative	
4	City of Austin dba Austin Energy	Reza Ebrahimian	Affirmative	
4	City of New Smyrna Beach Utilities Commission	Tim Beyrle		
4	City of Redding	Nicholas Zettel	Affirmative	
4	City Utilities of Springfield, Missouri	John Allen	Affirmative	
4	Consumers Energy	David Frank Ronk		
4	Detroit Edison Company	Daniel Herring		
4	Flathead Electric Cooperative	Russ Schneider	Affirmative	
4	Florida Municipal Power Agency	Frank Gaffney	Affirmative	
4	Fort Pierce Utilities Authority	Cairo Vanegas		
4	Georgia System Operations Corporation	Guy Andrews	Negative	

4	Illinois Municipal Electric Agency	Bob C. Thomas	Affirmative	
4	LaGen	Richard Comeaux		
4	Madison Gas and Electric Co.	Joseph DePoorter	Affirmative	
4	Modesto Irrigation District	Spencer Tacke	Negative	
4	North Carolina Eastern Municipal Power Agency	Cecil Rhodes	Affirmative	
4	Ohio Edison Company	Douglas Hohlbaugh	Affirmative	
4	Oklahoma Municipal Power Authority	Ashley Stringer	Affirmative	
4	Old Dominion Electric Coop.	Mark Ringhausen	Affirmative	
4	Public Utility District No. 1 of Douglas County	Henry E. LuBean	Affirmative	
4	Public Utility District No. 1 of Snohomish County	John D Martinsen	Affirmative	
4	Sacramento Municipal Utility District	Mike Ramirez	Affirmative	
4	Seattle City Light	Hao Li	Affirmative	
4	Seminole Electric Cooperative, Inc.	Steven R Wallace	Negative	
4	Tacoma Public Utilities	Keith Morisette	Affirmative	
4	Turlock Irrigation District	Steven C Hill		
4	Wisconsin Energy Corp.	Anthony Jankowski	Affirmative	
4	WPPI Energy	Todd Komplin	Affirmative	
5	AEP Service Corp.	Brock Ondayko	Negative	
5	Amerenue	Sam Dwyer	Affirmative	
5	Arizona Public Service Co.	Edward Cambridge	Negative	
5	Avista Corp.	Edward F. Groce		
5	BC Hydro and Power Authority	Clement Ma	Abstain	
5	Boise-Kuna Irrigation District/dba Lucky peak power plant project	Mike D Kukla	Affirmative	
5	Bonneville Power Administration	Francis J. Halpin	Affirmative	
5	Brazos Electric Power Cooperative, Inc.	Shari Heino	Affirmative	
5	Caithness Long Island, LLC	Jason M Moore		
5	City and County of San Francisco	Daniel Mason	Affirmative	
5	City of Austin dba Austin Energy	Jeanie Doty	Affirmative	
5	City of Redding	Paul A. Cummings	Affirmative	
5	City of Tallahassee	Karen Webb	Negative	
5	Cleco Power	Stephanie Huffman	Affirmative	
5	Cogentrix Energy, Inc.	Mike D Hirst	Affirmative	
5	Colorado Springs Utilities	Jennifer Eckels	Affirmative	
5	Consolidated Edison Co. of New York	Wilket (Jack) Ng	Affirmative	
5	Consumers Energy Company	David C Greyerbiehl	Affirmative	
5	Detroit Edison Company	Christy Wicke	Affirmative	
5	Dominion Resources, Inc.	Mike Garton	Affirmative	
5	Duke Energy	Dale Q Goodwine	Affirmative	
5	Edison Mission Marketing & Trading Inc.	Brenda J Frazer	Affirmative	
5	El Paso Electric Company	David Hawkins	Affirmative	
5	Electric Power Supply Association	John R Cashin		
5	Energy Services, Inc.	Tracey Stubbs	Affirmative	
5	Essential Power, LLC	Patrick Brown	Affirmative	
5	Exelon Nuclear	Michael Korchynsky	Affirmative	
5	FirstEnergy Solutions	Kenneth Dresner		
5	Florida Municipal Power Agency	David Schumann	Affirmative	
5	Hydro-Québec Production	Roger Dufresne	Negative	
5	JEA	John J Babik	Affirmative	
5	Kansas City Power & Light Co.	Brett Holland	Affirmative	
5	Kissimmee Utility Authority	Mike Blough	Abstain	
5	Lakeland Electric	James M Howard	Affirmative	
5	Liberty Electric Power LLC	Daniel Duff	Affirmative	
5	Lincoln Electric System	Dennis Florom	Affirmative	
5	Los Angeles Department of Water & Power	Kenneth Silver	Abstain	
5	Lower Colorado River Authority	Tom Foreman		
5	Luminant Generation Company LLC	Mike Laney		
5	Manitoba Hydro	S N Fernando	Abstain	
5	Massachusetts Municipal Wholesale Electric Company	David Gordon	Abstain	
5	MEAG Power	Steven Grego	Affirmative	
5	MidAmerican Energy Co.	Christopher Schneider	Affirmative	
5	Muscatine Power & Water	Mike Avesing	Affirmative	
5	Nebraska Public Power District	Don Schmit	Affirmative	
5	New York Power Authority	Wayne Sipperly	Affirmative	
5	NextEra Energy	Allen D Schriver	Affirmative	

5	North Carolina Electric Membership Corp.	Jeffrey S Brame	Affirmative	
5	Occidental Chemical	Michelle R DAntuono	Affirmative	
5	Omaha Public Power District	Mahmood Z. Safi	Affirmative	
5	Pacific Gas and Electric Company	Richard J. Padilla		
5	PacifiCorp	Sandra L. Shaffer	Affirmative	
5	Platte River Power Authority	Roland Thiel		
5	Portland General Electric Co.	Matt E. Jastram	Affirmative	
5	PPL Generation LLC	Annette M Bannon	Affirmative	
5	Progress Energy Carolinas	Wayne Lewis		
5	Proven Compliance Solutions	Mitchell E Needham		
5	PSEG Fossil LLC	Tim Kucey	Affirmative	
5	Public Utility District No. 1 of Lewis County	Steven Grega	Negative	
5	Public Utility District No. 2 of Grant County, Washington	Michiko Sell	Affirmative	
5	Puget Sound Energy, Inc.	Tom Flynn	Abstain	
5	Sacramento Municipal Utility District	Bethany Hunter	Affirmative	
5	Salt River Project	William Alkema	Affirmative	
5	Santee Cooper	Lewis P Pierce	Negative	
5	Seminole Electric Cooperative, Inc.	Brenda K. Atkins	Negative	
5	Snohomish County PUD No. 1	Sam Nietfeld	Affirmative	
5	Southeastern Power Administration	Douglas Spencer	Affirmative	
5	Southern California Edison Company	Denise Yaffe	Affirmative	
5	Southern Company Generation	William D Shultz	Affirmative	
5	Tacoma Power	Chris Mattson	Affirmative	
5	Tampa Electric Co.	RJames Rocha	Affirmative	
5	Tennessee Valley Authority	David Thompson	Affirmative	
5	TransAlta Corporation	Rebbekka McFadden		
5	Tri-State G & T Association, Inc.	Mark Stein	Affirmative	
5	U.S. Army Corps of Engineers	Melissa Kurtz	Affirmative	
5	U.S. Bureau of Reclamation	Martin Bauer		
5	Westar Energy	Bryan Taggart	Affirmative	
5	WPPI Energy	Steven Leovy	Affirmative	
5	Xcel Energy, Inc.	Liam Noailles	Affirmative	
6	AEP Marketing	Edward P. Cox	Negative	
6	Ameren Energy Marketing Co.	Jennifer Richardson	Affirmative	
6	APS	Randy A. Young	Negative	
6	Bonneville Power Administration	Brenda S. Anderson	Affirmative	
6	City of Austin dba Austin Energy	Lisa L Martin	Affirmative	
6	City of Redding	Marvin Briggs	Affirmative	
6	Cleco Power LLC	Robert Hirchak	Affirmative	
6	Colorado Springs Utilities	Lisa C Rosintoski	Affirmative	
6	Consolidated Edison Co. of New York	Nickesha P Carrol		
6	Constellation Energy Commodities Group	Donald Schopp	Affirmative	
6	Dominion Resources, Inc.	Louis S. Slade	Affirmative	
6	Duke Energy	Greg Cecil		
6	El Paso Electric Company	Tony Soto		
6	Entergy Services, Inc.	Terri F Benoit		
6	FirstEnergy Solutions	Kevin Querry	Affirmative	
6	Florida Municipal Power Agency	Richard L. Montgomery	Affirmative	
6	Florida Municipal Power Pool	Thomas Washburn	Affirmative	
6	Florida Power & Light Co.	Silvia P. Mitchell	Affirmative	
6	Great River Energy	Donna Stephenson		
6	Imperial Irrigation District	Cathy Bretz	Abstain	
6	Kansas City Power & Light Co.	Jessica L Klinghoffer	Affirmative	
6	Lakeland Electric	Paul Shipps	Affirmative	
6	Lincoln Electric System	Eric Ruskamp	Affirmative	
6	Los Angeles Department of Water & Power	Brad Packer	Abstain	
6	Luminant Energy	Brad Jones	Affirmative	
6	Manitoba Hydro	Daniel Prowse	Abstain	
6	MidAmerican Energy Co.	Dennis Kimm	Affirmative	
6	Modesto Irrigation District	James McFall	Affirmative	
6	Muscatine Power & Water	John Stolley	Affirmative	
6	New York Power Authority	Saul Rojas	Affirmative	
6	North Carolina Municipal Power Agency #1	Matthew Schull		
6	Northern Indiana Public Service Co.	Joseph O'Brien	Affirmative	
6	NRG Energy, Inc.	Alan Johnson		
6	Omaha Public Power District	David Ried		

6	PacifiCorp	Scott L Smith	Affirmative	
6	Platte River Power Authority	Carol Ballantine	Affirmative	
6	Portland General Electric Co.	John Jamieson		
6	PPL EnergyPlus LLC	Elizabeth Davis	Affirmative	
6	Progress Energy	John T Sturgeon		
6	PSEG Energy Resources & Trade LLC	Peter Dolan	Affirmative	
6	Public Utility District No. 1 of Chelan County	Hugh A. Owen	Abstain	
6	Sacramento Municipal Utility District	Diane Enderby	Affirmative	
6	Salt River Project	Steven J Hulet	Affirmative	
6	Santee Cooper	Michael Brown	Negative	
6	Seattle City Light	Dennis Sismaet	Affirmative	
6	Seminole Electric Cooperative, Inc.	Trudy S. Novak	Negative	
6	Snohomish County PUD No. 1	William T Moojen		
6	South California Edison Company	Lujuanna Medina	Affirmative	
6	Southern Company Generation and Energy Marketing	John J. Ciza	Affirmative	
6	Tacoma Public Utilities	Michael C Hill	Affirmative	
6	Tampa Electric Co.	Benjamin F Smith II		
6	Tennessee Valley Authority	Marjorie S. Parsons	Affirmative	
6	Westar Energy	Grant L Wilkerson	Affirmative	
6	Western Area Power Administration - UGP Marketing	Peter H Kinney	Affirmative	
6	Xcel Energy, Inc.	David F Lemmons	Affirmative	
8		Edward C Stein	Affirmative	
8		James A Maenner		
8		Roger C Zaklukiewicz		
8	JDRJC Associates	Jim Cyrulewski	Affirmative	
8	Massachusetts Attorney General	Frederick R Plett	Negative	
8	Utility Services, Inc.	Brian Evans-Mongeon		
8	Utility System Effeciencies, Inc. (USE)	Robert L Dintelman		
8	Volkmann Consulting, Inc.	Terry Volkmann		
9	Commonwealth of Massachusetts Department of Public Utilities	Donald Nelson	Negative	
9	National Association of Regulatory Utility Commissioners	Diane J. Barney		
10	Midwest Reliability Organization	William S Smith	Affirmative	
10	New York State Reliability Council	Alan Adamson	Affirmative	
10	Northeast Power Coordinating Council	Guy V. Zito	Affirmative	
10	ReliabilityFirst Corporation	Anthony E Jablonski	Affirmative	
10	SERC Reliability Corporation	Carter B. Edge	Affirmative	
10	Southwest Power Pool RE	Emily Pennel	Abstain	
10	Texas Reliability Entity, Inc.	Donald G Jones	Abstain	
10	Western Electricity Coordinating Council	Steven L. Rueckert	Affirmative	

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