

Individual or group. (32 Responses)
 Name (17 Responses)
 Organization (17 Responses)
 Group Name (15 Responses)
 Lead Contact (15 Responses)
 Question 1 (30 Responses)
 Question 1 Comments (32 Responses)
 Question 2 (30 Responses)
 Question 2 Comments (32 Responses)
 Question 3 (27 Responses)
 Question 3 Comments (32 Responses)
 Question 4 (26 Responses)
 Question 4 Comments (32 Responses)
 Question 5 (0 Responses)
 Question 5 Comments (32 Responses)

Individual
Scott McGough
Georgia System Operations Corporation
No
See Comment no. 5
No
See Comment no. 5
No
See Comment no. 5
No
See Comment no. 5
The industry and the NERC Board have already approved retiring TOP-006. TOP-001 through TOP-006 are going to be replaced with new versions of TOP-001 through TOP-003. The new versions have already been filed with FERC and are pending FERC's approval. No additional time should be spent on this interpretation for TOP-006 by NERC or by the industry. This project should be closed.
Individual
Michael Falvo
Independent Electricity System Operator
Yes
Yes
Yes
Yes
Individual
Mace Hunter

Lakeland Electric
No
I agree with the changes to R1.2. The new R1.3 is redundant in requiring the BA to inform it's TO of all generator resources available for use when R1.1 requires the GO to inform it's TO of all generator resources available for use. Redundant information would be passing through a third party, the BA.
Yes
Yes
Yes
Group
Northeast Power Coordinating Council
Guy Zito
Yes
No
The requirement to provide "appropriate technical information" should be revised to require applicable operational information.
Yes
Yes
CAN-0026 dated Dec. 9, 2011 should be withdrawn because it expanded the scope to include protective relays regardless of ownership or maintenance responsibility that may impact the entity.
Individual
Thad Ness
American Electric Power
Yes
Yes
Yes
Yes
Individual
RoLynda Shumpert
South Carolina Electric and Gas
Yes

Yes
Yes
Yes
Individual
Wayne Sipperly
New York Power Authority
NYPA is supporting the comments submitted by the NPCC Regional Standards Committee (RSC).
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Individual
Terri Pyle
Oklahoma Gas & Electric
Yes
Yes
Yes
Yes
Regarding R3 and M3, it might be appropriate to provide more information on what is considered "appropriate technical information". Can we assume this is related to the requirements in the PRC-001 standard?
Individual
Patrick Brown
Essential Power, LLC
Yes
Yes
Yes
Yes
Group

MRO NSRF
WILL SMITH
Yes
The NSRF agrees, thank you.
Yes
The NSRF agrees, thank you.
Yes
The NSRF agrees, thank you.
Yes
The NSRF agrees, thank you.
In the Table of Compliance Elements under the R3 row, it appears the criteria for Lower VSL and Severe VSL are the same. Currently in the Lower VSL column, it states the responsible entity failed to provide any of the information; and, in the severe, it states the responsible entity failed to provide all of the information. If an entity fails to provide any of the information, there is a perception they can't provide any of the information at all, which is very similar to failing to provide all. Recommend the word "any" be changed to "some" in the Lower VSL column.
Individual
Jonathan Appelbaum
The United illuminating Company
No
The phrasing for R1 can still be interpreted to apply to both Transmission Operators and Balancing Authorities even with the proposed changes to the sub-requirement. We have seen NERC Compliance apply the requirements at the Requirement level without regard to the subrequirements phrasing. We suggest adding an additional phrase to R1 such that R1 states, Each Transmission Operator and Balancing Authority shall know the status of all generation and transmission resources available for use AS SPECIFIED FURTHER IN THE SUB_REQUIREMENTS. In the alternative, each sub requirement could be relabeled as its own requirement.
No
UI agrees with the concept but disagrees with the phrasing, for which the entity has responsibility. Responsibility to do what? Responsibility to operate or responsibility to build, or responsibility to maintain etc. Was the intent to provide operating personnel information of protection systems deployed in the operating area which impacts the functions the Entity registered for.
Yes
Yes
Group
Progress Energy
Jim Eckelkamp
PGN supports the comments submitted by Duke

Individual
Don Jones
Texas Reliability Entity
Yes
No
Responsibility is one aspect to consider but impact to the area of the responsible entities in question is as important to consider. With the proposed wording it appears that Reliability Coordinators and Balancing Authorities, in general, will not provide any technical information to their personnel concerning protective relays. Determining the extent of "responsibility" as used here is ambiguous and difficult to determine. Does an SPS owned by a Generator Owner, Transmission Owner, or Distribution Provider meet the intent of the "responsibility" phrase for the Reliability Coordinator and Transmission Operator? Suggest changing the wording to "Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate technical information concerning protective relays WITHIN OR IMPACTING THEIR AREA(S)." The VSLs for R3 seem inappropriate in that a Lower VSL is applicable if the responsible entity failed to provide "any" appropriate technical information yet a Severe VSL is applicable if the responsible entity failed to provide "all" appropriate technical information. We suggest you revise this to use less ambiguous terminology.
Yes
There is not a Measurement for Requirement 6. Should "Complaint" be added in the "Compliance Monitoring and Assessment Processes" section?
Individual
Scott Bos
Muscatine Power and Water
Yes
Thank you
Yes
Thank you
Yes
Thank you
Yes
Thank you
MPW would like to point out that in the Table of Compliance Elements under the R3 row, it appears the criteria for Lower VSL and Severe VSL are the same. Currently in the Lower VSL column, it states the responsible entity failed to provide any of the information; and, in the severe, it states the responsible entity failed to provide all of the information. If an entity fails to provide any of the information, there is a perception they can't provide any of the information at all, which is very similar to failing to provide all. MPW recommends the word "any" be changed to "some" in the Lower VSL column.
Individual
Andrew Z. Pusztai
American Transmission Company

Yes
ATC is encouraged by the action of the SDT in splitting the responsibilities of BAs and TOPs rather than having one requirement for both functions. ATC is further recommending that NERC consider doing this for other Reliability Standards where BAs and TOPs are obligated to same requirements in one requirement, and revise in the same manner.
Yes
Since it is acknowledged there would be double jeopardy with PRC-001 R1 until Project 2007-03 Real-time Operations is approved and TOP-006 R3 is retired, ATC recommends deleting R3 of TOP-006-2 at this time and introducing the Reliability Coordinator as an Applicable Function within PRC-001-2 and include as part of PRC-001-2 R1.
Yes
Yes
Group
Tennessee Valley Authority
DeWayne Scott
No
The splitting of the previous R1.2 into a revised R1.2 and a new R1.3 is a good start but falls short of adding the necessary clarity. We suggest the word "all" be deleted in R1, R1.1, R1.2 and R1.3 and that R1 should be linked to R1.1, R1.2 and R1.3 as follows: Each Transmission Operator and Balancing Authority shall know the status of generation and transmission resources available for use "as specified in R1.1, R1.2 and R1.3". Alternatively, we feel that considerable overlap exists in requirements between R1 of TOP-006-2 and R14, R16 and R17 of TOP-002-2b and R1 can therefore be eliminated.
No
The R3 revision is an improvement but is still too broad as "appropriate technical information" could mean the detailed specifications of a relay or what protective/operating functions it performs. Operating personnel need to know the purpose and function of relays but not the internal workings of the relay (i.e. what the relay does, not how it does it). We also believe that the language in R3 is duplicated in Standard PRC-001, R1; therefore, R3 can be eliminated - if not, it should be rewritten as follows: R3: Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate information concerning the functions of protective relays for which the entity has responsibility.
The SDT has indicated that some language has been added "bring the standard up to the current boiler plate wording approved by the Standards Committee", specifically in section A.5. (Proposed) Effective Date. It is not clear by what means the Standards Committee has developed or instructed the SDT to implement what has been indicated as "boiler plate" language. The SC has a document entitled Drafting Team Guidelines that does include "default language" to be used in developing standards. The SDT should develop standards based upon the SC approved document entitled Drafting Team Guidelines. The VSLs for R3 seem to be reversed (ie. failure to provide any info should be Severe and failure to provide all info should be Lower). This appears to have been in error since the initial version.
Group

Bonneville Power Administration
Chris Higgins
Yes
Yes
Yes
Yes
BPA thanks you for the opportunity to comment on the Rapid Revision of TOP-006 and supports the standard as written with no other comments or concerns.
Group
Southwest Power Pool Regional Entity
Emily Pennel
Yes
No
"Responsibility" is not the appropriate word in R3 and M5. In R3 and M5, SPP RE recommends stating "...appropriate technical information concerning protective relays in the entity's footprint. "
Yes
Yes
Group
Dominion
Connie Lowe
No
The splitting of the previous R1.2 into a revised R1.2 and a new R1.3 is a good start but falls short of adding the necessary clarity. Dominion suggests the word "all" be deleted in R1, R1.1, R1.2 and R1.3 and that R1 should be linked to R1.1, R1.2 and R1.3 as follows: Each Transmission Operator and Balancing Authority shall know the status of generation and transmission resources available for use "as specified in R1.1, R1.2 and R1.3". Alternatively, Dominion feels that considerable overlap exists in requirements between R1 of TOP-006-2 and R14, R16 and R17 of TOP-002-2b and R1 can therefore be eliminated.
No
The R3 revision is an improvement but is still too broad as "appropriate technical information" could mean the detailed specifications of a relay or what protective/operating functions it performs. Operating personnel need to know the purpose and function of relays but not the internal workings of the relay (i.e. what the relay does, not how it does it). Dominion believes that the language in R3 is duplicated in Standard PRC-001, R1; therefore, R3 can be eliminated - if not, it should be rewritten as follows: R3: Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate information concerning the functions of protective relays for which the entity has responsibility.

Yes
Yes
Dominion suggests in M3 where "Transmission Operators" is referenced this be changed to read as "Transmission Operator(s)".
Group
Duke Energy
Greg Rowland
No
(1) R1.2 - The TOP should continue to inform its BA about transmission resources available for use. The Functional Model states that the Transmission Operator "15. Provides Real-time operations information to the Reliability Coordinator and Balancing Authority." Also, since TOPs can't determine which other TOPs may be "affected", we believe the TOP should inform "adjacent" TOPs about transmission resources available for use. Reword R1.2 as follows: " Each Transmission Operator shall inform its Reliability Coordinator, Balancing Authority and adjacent Transmission Operators of all transmission resources available for use." (2) M2 – Revise to be consistent with our suggested change to R1.2 above. (3) M5 – Revise to be consistent with our suggested change to R3 below. (4) VSLs for R1.2 and R3 – Revise to be consistent with our suggested changes to R1.2 and R3. Also, the Lower and Severe VSLs for R3 appear to be reversed (i.e. failure to provide "any" information is a more serious violation than a failure to provide "all" information).
No
PRC-001-2 Requirement R1 states "Each Transmission Operator, Balancing Authority, and Generator Operator shall be familiar with the purpose and limitations of protection system schemes applied in its area. [Violation Risk factor: High][Time Horizon: Operations Planning, Same-day Operations, Real-time Operations] . We believe that this requirement is redundant with TOP-006-3 except for the RC, so we suggest that R3 be rewritten to apply only to the RC. Since the phrases "its operating personnel" and "appropriate technical information" lack clarity needed for effective compliance, we propose that the rewrite should use wording similar to PRC-001-2 R1, as follows: "Each Reliability Coordinator shall be familiar with the purpose and limitations of protection system schemes applied in its area." Alternatively, since PRC-001-2 is now being revised to include just R1, TOP-006-3 could be revised to include the RC, TOP, BA and GOP, and PRC-001-2 could then be retired.
Yes
Yes
Individual
Jack Stamper
Clark Public Utilities
Yes
R1.3 is confusing to me. My utility is a TOP but not a BA. We have a transmission system which our own personnel operate and we have generation connected to our transmission. Our entire transmission system (with its connected generation) is located within the metering boundaries of one BA. R1.1 states our generator is supposed to notify my utility's TOP organization as well as our BA of its availability. I have no problem with R1.1. R1.3 states the BA is supposed to notify its RC

and its TOP. Our BA is also a TOP for its own transmission facilities. Our generator is not attached directly to our BA's transmission facilities but to our transmission facilities. Is R1.3 telling the BA it is supposed to notify its own TOP organization of the generator availability (generator attached to my utility's transmission system)? Chances are the people operating our BA are the same people operating our BA's transmission system so this notification seems kind of pointless. In the alternative, is R1.3 telling the BA it needs to notify the TOP that operates the transmission system the generator is connected to? The generator already did that in R1.1 so this would also seem to be pointless. Does the SDT intend for R1.3 to require the BA to notify its RC and "affected TOPs?" This make a little more sense than the current wording. If this is the intent of the SDT the wording doesn't do it. It seems to me that if per R1.1 the generator notifies its BA and its TOP and then per R1.3 the BA notifies its RC, everyone has been notified of the generator availability and therefore, R1.3 would not need to include a TOP notification. This issue is not critical to me since it provides a confusing requirement for the BA and my utility is not a BA. Therefore I plan to vote in the affirmative on the draft but the SDT should consider cleaning R1.3 up a bit to make it clear what TOP is supposed to be notified by the BA in R1.3.

Yes

Yes

Yes

Individual

Darryl Curtis

Oncor Electric Delivery

Yes

Yes

Yes

Yes

Group

ISO/RTO Council Standards Review Committee

Al DiCaprio

Yes

No

This requirement applies to RC, TOP and BA, and these entities have no responsibilities for the design or proper operation of the protective relays. These entities are responsible for meeting their respective, applicable standard requirements. Some of the tasks these entities perform may require an understanding of the protective relays, and this is the information that needs to be provided to the operating personnel. We therefore suggest the following alternative language to R3: R3. Each

RC, TOP, and BA shall provide its operating personnel with technical information concerning protective relays that is related to the respective entity's responsibility for meeting NERC standards.

Yes

Yes

Individual

Chris Mattson

Tacoma Power

Yes

Yes

Yes

Yes

Group

SERC OC Standards Review Group

Wayne Van Liere

No

The splitting of the previous R1.2 into a revised R1.2 and a new R1.3 is a good start but falls short of adding the necessary clarity. We suggest the word "all" be deleted in R1, R1.1, R1.2 and R1.3 and that R1 should be linked to R1.1, R1.2 and R1.3 as follows: Each Transmission Operator and Balancing Authority shall know the status of generation and transmission resources available for use "as specified in R1.1, R1.2 and R1.3". Alternatively, we feel that considerable overlap exists in requirements between R1 of TOP-006-2 and R14, R16 and R17 of TOP-002-2b and R1 can therefore be eliminated.

No

The R3 revision is an improvement but is still too broad as "appropriate technical information" could mean the detailed specifications of a relay or what protective/operating functions it performs. Operating personnel need to know the purpose and function of relays but not the internal workings of the relay (i.e. what the relay does, not how it does it). We also believe that the language in R3 is duplicated in Standard PRC-001, R1; therefore, R3 can be eliminated - if not, it should be rewritten as follows: R3: Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate information concerning the functions of protective relays for which the entity has responsibility.

The SDT has indicated that some language has been added "bring the standard up to the current boiler plate wording approved by the Standards Committee", specifically in section A.5. (Proposed) Effective Date. It is not clear by what means the Standards Committee has developed or instructed the SDT to implement what has been indicated as "boiler plate" language. The SC has a document

entitled Drafting Team Guidelines that does include "default language" to be used in developing standards. The SDT should develop standards based upon the SC approved document entitled Drafting Team Guidelines. The VSLs for R3 seem to be reversed (ie. failure to provide any info should be Severe and failure to provide all info should be Lower). This appears to have been in error since the initial version.

Group

Southern Company

Shammara Hasty

Yes

The GOP is already required to provide information on generating unit availability to the TOP under R1.1. Requiring the BA to also provide this same information to the TOP in R1.3 appears to be unnecessarily redundant. Also, the SDT should consider the redundancy of R1.1 and R1.3 to requirements in other standards that specify information exchange on generating resource availability and capability (e.g., TOP-002-2b, R14.; TOP-003-1, R1.; IRO-010-1a, R3.; etc.)

Yes

The SDT effectively addresses the ambiguity in R3 with respect to responsibility. However, we recommend that the SDT clarify what constitutes "appropriate technical information" concerning protective relays.

Yes

Yes

Group

Western Electricity Coordinating Council

Steve Rueckert

No

1.1 Requires Generator Operator to inform both BA and TOP of Generation Status while 1.3 Requires BA to inform TOP of Generation Status. This is duplicative. IF GOP must inform both TOP and BA there is no need to require BA to inform TOP. Preferable change would be for GOP to only inform BA and require BA to inform TOP. but could also work to have GOP inform both functions and remove requirement for BA to inform TOP from 1.3.

No

Change does not provide the clarity that is desired. This would require determining "responsibility" for protection systems between RC and TOP. In its role as RC with a wide area view what is its responsibility for a protection system as opposed to the TOP. Within a TOP/BA footprint what Protections system "responsibility" is split between these two functions. A BA should be as interested in Generator Protection systems as any Transmission Protection systems. Do not believe this change is required as R3 already identified the word "appropriate" technical information.

Yes

Yes

In 1.1 the GO is required to inform its Host BA of all generation resources available for use, and in 1.3 the BA is required to inform its RC and TOPs of all generation resources available for use. Is there any need for other BAs to be informed of generation resources available for use?

Group
PPL Corporation NERC Registered Affiliates
Stephen Berger
No
The splitting of the previous R1.2 into a revised R1.2 and a new R1.3 is a good start but falls short of adding the necessary clarity. The TOP (or GOP) cannot be held responsible for transmission (or generation) resources outside of its area of responsibility (i.e. outside its jurisdiction or not under its control). The revised R1.2 and new R1.3 do not state this distinction and are thus too broad. Suggest R1 be revised to: Each Transmission Operator and Balancing Authority shall know the status of generation and transmission resources available for use as specified in R1.1 and R1.2. Suggest R1.2 be revised to: Each Transmission Operator shall inform the Reliability Coordinator and other affected Transmission Operators of transmission resources under its control which are available for use. Suggest R1.3 be revised to: Each Balancing Authority shall inform its Reliability Coordinator and Transmission Operator of generation resources within its Balancing Authority Area which are available for use.
No
The R3 revision is an improvement but is still too broad as “appropriate technical information” could mean the detailed specifications of a relay or what protective/operating functions it performs. Operating personnel need to know the purpose and function of relays but not the internal workings of the relay (i.e. what the relay does not how it does it). Suggested language: R3: Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide System Operators with appropriate information concerning the functions of protective relays to allow such personnel to perform their real-time operating duties on protective relays for which the entity has responsibility.
The SDT has indicated that some language has been added “bring the standard up to the current boiler plate wording approved by the Standards Committee,” specifically in section A.5. (Proposed) Effective Date. It is not clear by what means the Standards Committee has developed or instructed the SDT to implement what has been indicated as “boiler plate” language. The SC has a document entitled Drafting Team Guidelines that does include “default language” to be used in developing standards. The SDT should develop standards based upon the SC approved document entitled Drafting Team Guidelines. If suggested language provided in comments 1 and 2 are adopted, Measures for R1, R1.2, R1.3 and R3 would need to be revised to be consistent with the revised language. The VSLs for R3 seem to be reversed (i.e. failure to provide any info should be Severe and failure to provide all info should be Lower).
Group
SPP Standards Review Group
Robert Rhodes
Yes
Yes
Yes
Yes

While we like what the SDT has done in providing clarification in R1.2, 1.3 and 3, we feel there are other issues that need to be addressed in Requirement 3. While the SDT is working on Requirement 3, it is an excellent time to go ahead and address these concerns. We have listed them below. Recognizing that these issues may be beyond the scope of the SAR in responding to the request for clarification from FMPP, these items are worthy of consideration. We feel that while a team is assembled to address other issues in the standard, that these specific issues should also be reviewed as well. The VSLs for R3 appear to need some work. The lack of providing 'any' protective relay information in the Low VSL is actually worse than not providing 'all' the protective relay information in the Severe VSL. We suggest replacing 'any' in the Low VSL with 'some'. The use of the term operating personnel gives us concern in determining what is the scope of that audience. Typically, auditors look at System Operators as being that group to which the information is addressed. However, on occasion, an auditor will include others in that category such as plant operators, field personnel, etc. We need clarification on exactly what is the scope of operating personnel. If it is intended to be only the System Operators, that is what the requirement should say. If not, we need to understand what is the breadth of personnel to include. We also have concerns about the potential for expanding the obligations of System Operators to inform others rather than being the target of that training/information. This is based upon the use of operator logs and voice recordings as evidence that the dissemination of information has actually taken place. We would also ask the SDT if they could clarify that the information provided in R3 is training information and not real-time operating information regarding serviceability of protective relay schemes. Additionally, we have concerns regarding the scope of the technical information called for in the requirement, especially with regards to what is 'appropriate'. The SDT's interpretation of and our interpretation of what is appropriate may be different. We suggest that the SDT eliminate the ambiguity and provide a defined scope of what information should be included.

Group

ACES Power Marketing Standards Collaborators

Jason L. Marshall

No

(1) Conceptually, we agree with splitting out the BA and TOP requirements. However, additional changes may be warranted. Since the GOP is already obligated to notify its TOP of all generation resources available for use pursuant to R1.1, does it make sense to obligate the BA to also notify the same TOP of the same information in R1.3? Furthermore, does this requirement work as intended for a situation where a generator is pseudo-tied out to another BA which is becoming increasingly common? The problem is that use of the word "its" in R1.3 with regard to a BA informing "its" TOPs could lead to confusion. As an example, one of our members, Sunflower, has several wind farms in its BA Area that are pseudo-tied out to other BA Areas. Let's say Acme Wind Company is the GOP for a wind farm located in Sunflower's footprint and interconnected to transmission facilities owned and operated by Sunflower. Let's further assume that the Acme wind farm is pseudo-tied to KCP&L's BA. If the status of the Acme wind farm changes, they, as GOP, will contact their Host BA (KCP&L) and the Transmission Operator (Sunflower) per R1.1. Requirement 1.3 then requires the KCP&L BA to notify "its Transmission Operator(s)" of all generation resources available for use. Who do they contact about the Acme outage? KCP&L TOP? Sunflower TOP? Both? The word "its" is possessive and implies that the KCP&L BA has a link to certain Transmission Operators. How is that link defined? Is it the TOPs that are directly interconnected to the generation resources that are part of their BA? If that is the case, when would more than one TOP need to be informed of a generator outage - i.e. why does the revised Standard say Transmission Operator(s)?

(2) Eliminating the need for the BA to notify the TOP in R1.3 is the cleanest solution. At a minimum, if this requirement is going to remain the wording should be changed to something like "Each BA shall inform ... affected Transmission Operator(s) of all generation resources available for use." This

latter solution would be consistent with R1.2. (3) In R1.3, using the word "its" to describe which RC a BA should inform about the status of generation resources is also confusing. If ACME has another generator in Sunflower's footprint interconnected to transmission facilities owned and operated by Sunflower that is pseudo-tied to ERCOT BA, they will notify ERCOT of a status change on this generator per R1.1. ERCOT BA would then be required to notify "its" RC which presumably is the ERCOT RC. The RC for the system in which the generator is located (SPP RC) would not be notified. Replacing "its" with "affected" again seems to make more sense. (4) While we understand that the scope of the rapid revision is fairly limited, we believe that it should be expanded to write appropriate VSLs for R1.2 and R1.3. Both requirements escalate non-compliance immediately to a Severe VSL for failure to notify the appropriate parties of all transmission or generation resources available for use regardless of the number of resources. We believe graduated VSLs could be written based on the percentage of resources for which the responsible entity did not notify the appropriate parties.

Yes

(1) We conceptually agree with the change but believe a further refinement is necessary. The changes indicate that each RC, TOP and BA is to provide "its operating personnel with appropriate technical information concerning protective relays for which the entity has responsibility". Because some debate could arise over what responsibility an RC, BA and TOP have, we think that this should be changed to "its operating personnel with appropriate technical information concerning protective relays in its RC Area, TOP Area and BA Area, respectively". RC Area, TOP Area, and BA Area are defined in the NERC glossary and provided more specificity over which protective relays. Otherwise, an auditor may interpret an RC or TOP having responsibility for protective relays outside of their areas because of the need to maintain a wide area view. Ultimately, the protective relays that each RC, TOP and BA has responsibility for are those in their RC Area, TOP Area and BA Area, respectively. (2) We agree with using "operating personnel" rather than the NERC defined term "System Operator". We believe that an RC, TOP or BA should be free to have technical experts that are knowledgeable about "appropriate technical information concerning protective relays" and that are not System Operators to support compliance with this requirement. However, we suggest adding a footnote or another explanation to make clear that this is the intent of the drafting team. Otherwise, there will be opportunity for debate in the future over who constitutes "operating personnel".

No

Since the purpose of the standard is "to ensure critical reliability parameters are monitored in real-time", we question if R4 should have Operations Planning and Same-day Operations time horizons. The purpose of the requirement is to "predict the system's near-term load pattern". Given the purpose, we can deduce that this near-term time frame may be intended for the Real-time Operations horizon which covers within one hour of the actual operation.

Yes

Individual

Tony Kroskey

Brazos Electric Power Cooperative, Inc.

No

Please see the formal comments submitted by ACES Power Marketing.

No

Please see the formal comments submitted by ACES Power Marketing.

No
Please see the formal comments submitted by ACES Power Marketing.
No
Please see the formal comments submitted by ACES Power Marketing.
Individual
Michael Gammon
Kansas City Power & Light
Yes
Yes
No
The Requirement 3 time horizon is "Operations Planning" but the measure for R3 is written like the time horizon should include "Same-day Operation" and "Real-time Operations". It is recommended to modify R3 to reflect the purpose of the standard which is to monitor system conditions in real time.
Yes
Clarifying R3 for equipment an entity is responsible for was successfully completed. However, the introduction of the measure has confused the intent for R3. Suggest modifying R3 to make it clear this is for operator awareness of real-time operating conditions: Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate technical information concerning a loss or compromise of functional operation of protective relays for which the entity has responsibility.