

**Coordinate Operations SAR
Consideration of Comments on Second Posting of SAR**

Background

The Coordinate Operations SAR was posted for a second public comment period from February 15 – March 17, 2003. The SAR DT asked industry participants to provide feedback on the revisions made to the SAR through a special SAR Comment Form that contained fourteen questions.

In this document, the comments have been cut and pasted under each of the fourteen questions. The SAR DT's consideration of comments is provided in yellow highlighted text immediately under each question. The blue boxes (adjacent to questions asking for feedback about specific requirements in the SAR), contain text from the second version of the SAR.

You can view the comments in their original format at:

<http://www.nerc.com/~filez/sar-approved.html>

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 Director of Standards, Tim Gallagher in the NERC office at 609-452-8060 or at

tim.gallagher@nerc.net

The Coordinate Operations SAR Drafting Team wishes to thank all who participated by submitting comments to help refine the scope of this SAR. The changes suggested during the second posting of the SAR were relatively minor, and the SAR DT has incorporated these changes in version 3 of the SAR. Version 3 of the SAR has been forwarded to the Standards Authorization Committee for approval to move this SAR forward to the Standards Drafting stage.

Index to Questions and Responses:

1. The SAR has been revised to clearly state that the scope of activities covered is restricted to Reliability Authority (RA) to RA coordination. Do you agree with this modification to the scope of the SAR? 2

2. Does this SAR contain any requirements that are not needed for reliability? 6

3. Are there terms used in this SAR that you feel should be defined?..... 8

4. Do you agree with this requirement that the RA ‘document authority?’ 11

5. Do you agree with this requirement that the RA ‘develop and share unique operating procedures?’ 14

6. Do you agree with this requirement that the RA ‘analyze maintenance outages?’ 18

7. Do you agree with this requirement that the RA ‘perform security analyses?’ 22

8. Do you agree with this requirement that the RA ‘perform gen resource availability analyses?’ 25

9. Do you agree with this requirement that the RA ‘share results of analyses?’ 28

10. Do you agree with this requirement that the RA ‘communicate with others?’ 32

11. Do you agree with this requirement that the RA ‘act with others?’ 35

12. Are you aware of any Regional/Interconnection Differences that should be included in this SAR? .38

13. Is the revised SAR missing any requirements that should be added?..... 40

14. If there are any requirements that you feel can not be measured, please identify them here..... 42

Consideration of Comments on Second Posting of Coordinate Operations SAR

1. The SAR has been revised to clearly state that the scope of activities covered is restricted to Reliability Authority (RA) to RA coordination. Do you agree with this modification to the scope of the SAR?

<p>Thomas Vandervort Trans Subcommittee</p>	<p>No 1) The question asks about the "scope" of activities. However, scope is ambiguous and the question should be restated to clearly ask about the "Purpose/Industry Need," "Brief Description," "Detailed Description," "Reliability Function," etc. to ensure the question receives the proper response. 2) Since the activities covered within this SAR is restricted to Reliability Authority (RA) to RA coordination, the title should be modified - such as "Reliability Authority Coordination of Operations" to state this change. Highlighting the "RA" in the title will distinguish it from Transmission Operator Coordinate Operations, Balancing Authority Coordinate Operations, etc. 3) Alternately, should the Standard address the coordination responsibilities of the "other authorities?" The risk of multiple standards is that there could be conflicting or redundant requirements.</p>
<p>The title of the SAR has been revised to more accurately reflect that this SAR focuses on RA to RA coordination. The SAR DT reviewed a list of coordination tasks and they are currently addressed in other SARs and draft standards. The SAR DT is also concerned that coordination may not be fully addressed in this SAR, and has forwarded a letter to the Director of Standards asking that this issue be resolved. This list will need to be reviewed in the future to verify that when the initial list of standards has been drafted or developed, all essential coordination tasks are addressed.</p>	
<p>Roman Carter Southern Co Gen & Energy Mktg 3,5,6 Joel Dison SCGEM 3,5,6 Tony Reed SCGEM 3,5,6 Lucius Burris SCGEM 3,5,6 Clifford Shephard SCGEM 3,5,6</p>	<p>No Are the RA's the only authorities who are required to coordinate or will other authorities be required to coordinate in other SARs. Also, since this SAR is speaking strictly to the RA function, you may want to rename the SAR to "Reliability Authority Coordination of Operations".</p>
<p>The SAR DT is also concerned that coordination may not be fully addressed in this SAR, and has forwarded a letter to the Director of Standards asking that this issue be resolved. The title of the SAR has been revised to more accurately reflect that this SAR focuses on RA to RA coordination.</p>	
<p>Robert Waldele NYISO 2</p>	<p>No The scope is not clear on if this defines the RA activities, or should the scope address the coordination of responsibilities among all "Authorities"? There is a risk of multiple standards or standards creating conflicting or redundant requirements.</p>
<p>The title will be revised to more accurately reflect that this SAR focuses on RA to RA coordination. The SAR DT is also concerned that coordination may not be fully addressed in this SAR, and has forwarded a letter to the Director of Standards asking that this issue be resolved.</p>	
<p>Linda Campbell FRCC Op & Eng Committee Paul Elwing Lakeland Elec 3 Marty Mennes FPL 1 Mark Bennett Gainesville 3 Roger Westphal Gainesville 3 Ben Sharma Kissimmee 3 Richard Gilbert Lakeland 3</p>	<p>No We understand that this SAR limits the requirements to the RA, but are not sure this is appropriate. The drafting team states that they assume that the data dissemination by the RA to lower level functions is addressed in other SARs. We are not sure that this is true. The related SARs listed in this SAR may cover some parts of coordination with lower level functions, but we are not convinced that everything is captured, especially since not all of the other SARs have not been fully developed. Why does the drafting team feel it is necessary to limit this</p>

Consideration of Comments on Second Posting of Coordinate Operations SAR

	<p>only to RA's? Would it make more sense to cover all coordination of operations for all reliability functions? In addition, there is still confusion between Reliability Authority and Reliability Coordinator which needs to be cleared up before this can be fully developed.</p>
<p>The title will be revised to more accurately reflect that this SAR focuses on RA to RA coordination. The Reliability Authority is a function that is performed by an entity. Presently there are many different job positions that perform the tasks assigned to the Reliability Authority function. The Reliability Coordinator is a position that does exist today but may not exist in the future. This list will need to be reviewed in the future to verify that when the initial list of standards has been drafted or developed, all essential coordination tasks are addressed. The SAR DT is also concerned that coordination may not be fully addressed in this SAR, and has forwarded a letter to the Director of Standards asking that this issue be resolved.</p>	
<p>George Bartlett Entergy 1</p>	<p>No We do not agree with this modification to the scope of the SAR. Version 1 of this SAR was in keeping with the concept that "each entity's operations are coordinated", as stated in the Purpose. We do agree with the more general Purpose of Version 1 of this SAR. We are very concerned that interaction among all the entities contributing to the reliability of the system will be lost with the separation of functions and requirements as envisioned in this SAR.</p> <p>We note there were several comments suggesting Version 1 was too vague, or general, from several of the commenters. These few comments do not justify this significant change especially when many entities did not comment on the original Purpose; and non-comment could be interpreted as agreement. We were satisfied with the detail of Version 1 and felt no need to comment on the level of detail. We also believe many others were also satisfied and did not feel the need to comment. Please return the Purpose of the SAR to the more general Purpose contained in Version 1.</p> <p>If the Purpose remains limited, then the Title of this SAR must be changed to reasonably reflect the Purpose. A more descriptive Title would be "Coordinate Operations - Reliability Authority to Reliability Authority". This SAR has been limited to reflect RA to RA coordination and the Title should reflect that limitation.</p> <p>Also, most of the entries in the Detailed Description relate to Requirements the RA must perform within its own reliability region, are not Requirements for RA to RA coordination and should be deleted from this SAR. Please see comments in response to questions below.</p> <p>This SAR appears to have been written placing Requirements on the RA that the authors, and NERC, do not have the authority to place on the RA. We hope this perception is an unintended result of short-hand discussion techniques and the SAR will be changed. Please see the detailed comments below.</p> <p>The new authors of this SAR should also make it very clear there is a new approach to the SAR development for "Coordinate Operations". They should make it clear there will be multiple SARs, the expected Title of</p>

Consideration of Comments on Second Posting of Coordinate Operations SAR

	each of the SARs, and when they think those SARs will be developed. In keeping with this RA to RA SAR, an example of one of the needed SARs would be a SAR for "Coordinate Operations - Balancing Authority to Balancing Authority".
<p>The title will be revised to more accurately reflect that this SAR focuses on RA to RA coordination. Before making changes to the SAR, the SAR DT consulted with the Requestor and considered the comments submitted on the first posting of the SAR. In asking the industry to comment on the changes, the SAR DT was asking for confirmation that the changes were acceptable to the industry. The SAR DT reviewed a list of coordination tasks and they are currently addressed in other SARs and draft standards. This list of coordination tasks will need to be reviewed in the future to verify that when the initial list of standards has been drafted or developed, all essential coordination tasks are addressed. The SAR DT is also concerned that coordination may not be fully addressed in this SAR, and has forwarded a letter to the Director of Standards asking that this issue be resolved.</p>	
Kathleen Goodman ISO New England 2	Yes; No I was under the impression that the latest terminology was "Reliability Coordinator." I think it is important that the terminology be clearly defined before activities are determined.
<p>The Reliability Authority is a function that is performed by an entity. Presently there are many different job positions that perform the tasks assigned to the Reliability Authority function. The Reliability Coordinator is a position that does exist today but may not exist in the future.</p>	
Guy Zito NPCC 2 Dan Stosick ISO NE 2 Roger Champagne HydroQuebec 1 Barry Gee Ngrid USA 1 David Kiguel HydroOne 1 Ralph Rufrano NYPA 1 Chuck Rusowicz Con Ed 1 Greg Campoli NYISO 2	Yes Before a standard is written on Coordination, definitions of who is performing what functions needs to be finalized. Will it be the existing RCs, (ISOs ISAs etc) who assume the role of the RAs or will it be some other new organization? It seems that the coordination between the RCs and RAs relationship needs to be addressed. In the Brief Description section page 1, under "This standard will addresses the following Areas" the first bullet change the "its" to it.
<p>The Functional Model Review Task Group does not expect that the changes being considered to the Functional Model will result in significant changes to the alignment of responsibilities amongst the functions already defined in the model. Each entity must choose what functions it wants to perform – NERC will not do this for an entity. The Reliability Authority is a function that is performed by an entity. Presently there are many different job positions that perform the tasks assigned to the Reliability Authority function. The Reliability Coordinator is a position that does exist today but may not exist in the future.</p>	
Darrell Richardson Illinois Power 1, 3	Yes However, we believe that consideration should be given to cover coordination with Planning Authority, Distribution Provider and Load-Serving Entity.
<p>The SAR DT reviewed a list of coordination tasks and they are currently addressed in other SARs and draft standards. This list of coordination tasks will need to be reviewed in the future to verify that when the initial list of standards has been drafted or developed, all essential coordination tasks are addressed.</p>	
Roger Green Southern Co Svcs SOCO Gen 5	Yes
Lee Xanthakos SCE&G 1	Yes
Allan Silk MAPP Operating Subcommittee	Yes
Steve Beuning Xcel Energy 6	Yes
William Smith Allegheny 1	Yes

Consideration of Comments on Second Posting of Coordinate Operations SAR

Thomas Washburn OUC 3	Yes
Terry Bilke Midwest ISO 2	Yes
Sam Jones ERCOT 2	Yes
Ross Owen Oncor 1	Yes
Ron Gunderson NBPD 1	Yes
Richard Schwarz PNSC 2	Yes
Raj Rana AEP 1,3,5, 6	Yes
Peter Burke ATC 1	Yes
Mitchell Needham TVA Stuart Goza TVA 1 Gary Jackson TVA 6	Yes
Ken Githens Allegheny Energy Supply 5	Yes
John Stickley AECI 1	Yes
John Blazekovich Exelon 1,3,5,6	Yes
Jim Griffith Southern Co 1	Yes
Jim Byrd Oncor 1	Yes

Consideration of Comments on Second Posting of Coordinate Operations SAR

2. Does this SAR contain any requirements that are not needed for reliability?

Linda Campbell FRCC Op & Eng Committee Paul Elwing Lakeland Elec 3 Marty Mennes FPL 1 Mark Bennett Gainesville 3 Roger Westphal Gainesville 3 Ben Sharma Kissimmee 3 Richard Gilbert Lakeland 3	Yes The first requirement for documentation of authority is not really a reliability requirement. It is however, part of the criteria to be certified as an RA so may not be appropriate in this SAR.
The requirement is in the list of criteria for RA Certification, and has been removed from this SAR.	
George Bartlett Entergy 1	Yes This SAR contains Requirements that are not needed for Reliability Authorities to Coordinate with neighboring RAs. Most of the entries in the Detailed Description relate to Requirements the RA must perform within its own reliability region, are not Requirements for RA to RA coordination and should be deleted from this SAR.
The SAR has been revised to limit the requirements to those that are needed for RA to RA coordination. The SAR DT reviewed the list of coordination tasks that occur between the RA and lower level functions, and found that most of these tasks are addressed in other SARs or draft standards.	
Guy Zito NPCC 2 Dan Stosick ISO NE 2 Roger Champagne HydroQuebec 1 Barry Gee Ngrid USA 1 David Kiguel HydroOne 1 Ralph Rufrano NYPA 1 Chuck Rusowicz Con Ed 1 Greg Campoli NYISO 2	Yes No
William Smith Allegheny 1	No
Thomas Washburn OUC 3	No
Thomas Vandervort Trans Subcommittee	No
Terry Bilke Midwest ISO 2	No
Sam Jones ERCOT 2	No
Ross Owen Oncor 1	No
Ron Gunderson NBPD 1	No
Roman Carter Southern Co Gen & Energy Mktg 3,5,6 Joel Dison SCGEM 3,5,6 Tony Reed SCGEM 3,5,6 Lucius Burris SCGEM 3,5,6 Clifford Shephard SCGEM 3,5,6	No
Robert Waldele NYISO 2	No
Richard Schwarz PNSC 2	No
Raj Rana AEP 1,3,5, 6	No
Peter Burke ATC 1	No
Mitchell Needham TVA Stuart Goza TVA 1 Gary Jackson TVA 6	No
Ken Githens Allegheny Energy Supply 5	No

Consideration of Comments on Second Posting of Coordinate Operations SAR

Roger Green Southern Co Sves SOCO Gen 5	No
Lee Xanthakos SCE&G 1	No
Allan Silk MAPP Operating Subcommittee	No
Kathleen Goodman ISO New England 2	No
John Stickley AECI 1	No
John Blazekovich Exelon 1,3,5,6	No
Jim Griffith Southern Co 1	No
Jim Byrd Oncor 1	No
Darrell Richardson Illinois Power 1, 3	No

3. Are there terms used in this SAR that you feel should be defined?

Allan Silk MAPP Operating Subcommittee	Yes Interconnection frequency limits
<p>Interconnection frequency limits are expected to be established by each interconnection and are addressed more specifically in the Balance Resources and Demand Standard.</p> <p>As used in this SAR, Interconnection frequency limits is a general term used to address the set of interconnection frequency limits established for each interconnection. This set of limits will, as currently envisioned by the Balance Resources and Demand Standard Drafting Team, include two sets of limits – a set of ‘hard’ limits and a set of ‘trigger’ limits. The ‘hard’ limits represent frequency limits that, if exceeded, put the interconnection’s reliability at risk from over frequency or under frequency relay actions. The ‘trigger’ limits are one contingency away from the ‘hard’ limits. Formulas and processes for calculating and approving these limits are being addressed by the Balance Resources and Demand SDT.</p>	
Thomas Vandervort Trans Subcommittee	Yes 1) First sub-bullet under Develop and Share Unique Operating Procedures need to define "identified potential operating scenarios" 2) "Generation Resource Availability"
<p>The procedures addressed in this requirement, are those procedures that require actions to protect the bulk transmission system such as: transferring an operating problem from one geographic area to another area; causing damage to critical equipment; or causing voltage instability, cascading outages, or uncontrolled separation. These would be identified through system planning and analyses.</p> <p>Generation resource availability is a look to see if there will be enough resources to meet load forecasts.</p>	
Roman Carter Southern Co Gen & Energy Mktg 3,5,6 Joel Dison SCGEM 3,5,6 Tony Reed SCGEM 3,5,6 Lucius Burris SCGEM 3,5,6 Clifford Shephard SCGEM 3,5,6	Yes Under “Perform Generation Resource Avail Analysis”, over what time period is the analysis performed- day, week, month, or multiple years?
<p>The SAR has been revised to indicate that these analyses are performed for current and next day.</p>	
Robert Waldele NYISO 2	Yes Need definitions for “generation resource availability” and “identified potential operating scenarios.”
<p>The procedures addressed in this requirement, are those procedures that require actions to protect the bulk transmission system such as: transferring an operating problem from one geographic area to another area; causing damage to critical equipment; or causing voltage instability, cascading outages, or uncontrolled separation. These would be identified through system planning and analyses.</p> <p>Generation resource availability is a look to see if there will be enough resources to meet load forecasts</p>	
Richard Schwarz PNSC 2	Yes Near term - Define as day ahead studies
<p>The SAR has been revised to use the phrase , “Current and next –day” to clarify what was meant by near-term.</p>	
Raj Rana AEP 1,3,5, 6	Yes “other involved entities:, “all involved parties”
<p>As used in this SAR, the term, ‘other involved entities’ means entities other than the named entity, that are directly involved in an activity.</p> <p>As used in this SAR, the term ‘all involved parties’ means all entities involved in an activity that are performing reliability functions.</p>	
Jim Griffith Southern Co 1	Yes The terms "involved parties" should be more clearly defined throughout

Consideration of Comments on Second Posting of Coordinate Operations SAR

	<p>this document. The "Shared Result section of page 2 the "Detailed Descriptions" should be modified to say "The RA shall share the results of its system analyses, when conditions warrant , or upon request, with neighboring RA's and make data available to all RAs for their own system analysis.</p>
<p>As used in this SAR, the term 'all involved parties' means all entities involved in an activity that are performing reliability functions.</p> <p>The Share Results section of the SAR has been revised as follows: "The RA shall share the results of its system analyses, when conditions¹ warrant, , with other RA's, and other involved entities (or upon request, subject to the FERC Code of Conduct and other Confidentiality Agreements)" There are situations where data may be needed by more than just neighboring RAs.</p>	
<p>Guy Zito NPCC 2 Dan Stosick ISO NE 2 Roger Champagne HydroQuebec 1 Barry Gee Ngrid USA 1 David Kiguel HydroOne 1 Ralph Rufrano NYPA 1 Chuck Rusowicz Con Ed 1 Greg Campoli NYISO 2</p>	<p>Yes It is unclear what a Document Authority is. Clarification is needed here. A suggestion might be to change this to the "documenting RA", if that is what is intended.</p>
<p>The SAR has been revised so that this reference is no longer contained within the SAR.</p>	
<p>Kathleen Goodman ISO New England 2</p>	<p>Yes</p>
<p>John Blazekovich Exelon 1,3,5,6</p>	<p>Yes</p>
<p>Mitchell Needham TVA Stuart Goza TVA 1 Gary Jackson TVA 6</p>	<p>No There might be some discussion about the use of the term authority rather than requirement. Does using authority mean it is optional?</p>
<p>The SAR has been revised so that this reference is no longer contained within the SAR.</p>	
<p>William Smith Allegheny 1</p>	<p>No</p>
<p>Thomas Washburn OUC 3</p>	<p>No</p>
<p>Terry Bilke Midwest ISO 2</p>	<p>No</p>
<p>Sam Jones ERCOT 2</p>	<p>No</p>
<p>Ross Owen Oncor 1</p>	<p>No</p>
<p>Peter Burke ATC 1</p>	<p>No</p>
<p>Roger Green Southern Co Svs SOCO Gen 5</p>	<p>No</p>
<p>Linda Campbell FRCC Op & Eng Committee Paul Elwing Lakeland Elec 3 Marty Mennes FPL 1 Mark Bennett Gainesville 3 Roger Westphal Gainesville 3 Ben Sharma Kissimmee 3 Richard Gilbert Lakeland 3</p>	<p>No</p>
<p>Lee Xanthakos SCE&G 1</p>	<p>No</p>
<p>Ken Githens</p>	<p>No</p>

¹ The conditions referenced are those that if left unattended could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the interconnected bulk transmission system.

Consideration of Comments on Second Posting of Coordinate Operations SAR

Allegheny Energy Supply 5	
John Stickle AECI 1	No
Jim Byrd Oncor 1	No
George Bartlett Entergy 1	No
Darrell Richardson Illinois Power 1, 3	No

Consideration of Comments on Second Posting of Coordinate Operations SAR

4. Do you agree with this requirement that the RA 'document authority?'

- Document Authority
When one RA's system has had an adverse impact¹ on another RA's system, the RA that caused the problem shall have the authority to take actions (within its own RA Area) to mitigate the problem.

Summary Consideration:

This requirement has been removed from the SAR because it duplicates a requirement that is currently included in the RA Certification SAR.

Ron Gunderson NBPD 1	No If RA1's system impacts RA2's system, there may not be options on RA1's system to mitigate the problem. It may require actions in another RA's system to mitigate the problem. The SAR and standard need to provide a mechanism to ensure that if a problem is identified that all RA's that contribute to the problem are bound to take action to correct the problem.
Raj Rana AEP 1,3,5, 6	No The SAR should address the need to coordinate procedures among the impacted and impacting RAs to mitigate the problem. The SAR should also address the authority rights that the impacted RA has. What can the impacted RA do if the impacting RA does not take action? Does the impacted RA have the "right" via this standard to demand the impacting RA to take action?
Linda Campbell FRCC Op & Eng Committee Paul Elwing Lakeland Elec 3 Marty Mennes FPL 1 Mark Bennett Gainesville 3 Roger Westphal Gainesville 3 Ben Sharma Kissimmee 3 Richard Gilbert Lakeland 3	No See comment to question 2. <i>{ The first requirement for documentation of authority is not really a reliability requirement. It is however, part of the criteria to be certified as an RA so may not be appropriate in this SAR. }</i> In addition, if the drafting team determines to keep this, the wording needs to be refined to make sure that the requirement is for documentation and not for having authority. The authority to act should be covered in the criteria for RA certification.
George Bartlett Entergy 1	No The authors and NERC do not have the authority to have this as one of the RA Requirements, as written. There is no "RA system". An RA performs reliability services for the Transmission Service Providers that contract with the RA for those services. Each TSP has Tariff provisions and requirements that dictate the terms, conditions and price under which that TSP may take action to mitigate reliability or commercial situations on another Transmission Service Provider's system, not the RA's system. Each TSP has contracts with each generator owner dictating the terms, conditions and price under which each generator will perform what actions for maintaining reliability. We agree, each RA should document its authority for performing reliability services for each of the TSPs with which it has contracts. However, that document is a general document that should probably go to NERC offices and is not part of the RA to RA documentation. What should be communicated between RAs is each TSPs Tariff provisions for mitigating reliability problems on another TSPs transmission system. Therefore, for the purposes of this SAR, we suggest the following wording for this Requirement: "Document Authority - The RA shall communicate to the other RAs for each of the interconnected TSPs with which the other RAs have

Consideration of Comments on Second Posting of Coordinate Operations SAR

	contracted, those TSP Tariff and contract provisions under which each TSP may take action to mitigate reliability situations on the transmission systems of the TSPs of the other RAs."
Jim Griffith Southern Co 1	No Due to the importance of the statement that the RA should have the authority to take actions within its own RA Area to mitigate the problem, the parenthesis should not be used in the sentence.
Thomas Washburn OUC 3	Yes The detailed description also has "When one RA's system has a potential". Is potential being deleted. The system causing the problem should always have the first responsibility to take actions on its own system to mitigate the problem.
Thomas Vandervort Trans Subcommittee	Yes "Document Authority" requirement is abbreviated. However, as it is stated, it can be confusing. The TS recommends expanding the requirement to match the Brief Description "Documenting the RAs authority to assist in resolving problems that it is caused to another system"
Roman Carter Southern Co Gen & Energy Mktg 3,5,6 Joel Dison SCGEM 3,5,6 Tony Reed SCGEM 3,5,6 Lucius Burris SCGEM 3,5,6 Clifford Shephard SCGEM 3,5,6	Yes What does "document authority" mean? I'm assuming that you are recommending that it is the RA who is causing a problem will have the authority to act and that the standard should have this "authority" documented. If this is what is being stated, then I agree.
Robert Waldele NYISO 2	Yes The paraphrased statement above is misleading as it left out the reference to "potential adverse impact." The header for this section should also be reworded to "Document the RAs Authority." A standard should also clearly state that it is (also) the responsibility and obligation of the RA causing the problem to take corrective action to mitigate.
Richard Schwarz PNSC 2	Yes The RA whose system is causing the problem should be required to take action within its own RA Area to mitigate the problem
Mitchell Needham TVA Stuart Goza TVA 1 Gary Jackson TVA 6	Yes Consideration might also be given to requiring assistance to others under certain conditions.
Ken Githens Allegheny Energy Supply 5	Yes Does the statement "shall have the authority" mean the same as "shall have the obligation"? If so, then just say obligation - has more accountability.
John Blazekovich Exelon 1,3,5,6	Yes We agree with this requirement, but we believe the RA that is affected by the other's problem should have the ability to take action if the initiating RA does not take action, or the actions of the RA are ineffective.
Guy Zito NPCC 2 Dan Stosick ISO NE 2 Roger Champagne HydroQuebec 1 Barry Gee Ngrid USA 1	Yes "Potential" adverse impacts should also be considered between RAs, this needs to be added back in. It is not clear if this bullet is in addition to the original. If not, and the above is intended as a replacement, we would request that the potential adverse impact be reported and be included in

Consideration of Comments on Second Posting of Coordinate Operations SAR

David Kiguel HydroOne 1 Ralph Rufrano NYPA 1 Chuck Rusowicz Con Ed 1 Greg Campoli NYISO 2	this statement.
Darrell Richardson Illinois Power 1, 3	Yes However, we feel that the wording should be "... shall have the authority and be responsible for taking actions..."
Lee Xanthakos SCE&G 1	Yes
Roger Green Southern Co Sves SOCO Gen 5	Yes
Allan Silk MAPP Operating Subcommittee	Yes
Jim Byrd Oncor 1	Yes
Steve Beuning Xcel Energy 6	Yes
William Smith Allegheny 1	Yes
Terry Bilke Midwest ISO 2	Yes
Sam Jones ERCOT 2	Yes
Ross Owen Oncor 1	Yes
Peter Burke ATC 1	Yes
Kathleen Goodman ISO New England 2	Yes
John Stickley AECI 1	Yes

Consideration of Comments on Second Posting of Coordinate Operations SAR

5. Do you agree with this requirement that the RA ‘develop and share unique operating procedures?’

- Develop and Share Unique Operating Procedures
Unique operating procedures that address identified potential operating scenarios that may impact neighbor RA’s or the Interconnection shall be developed, and distributed to all involved parties.

Summary Consideration:

This requirement has been modified to include the maintenance of these procedures and to eliminate the word, ‘unique.’ The procedures being addressed here are those that involve adjacent RAs or RAs within an Interconnection or within a geographic area. The term, all involved parties is meant to include all of the RAs that either need to take action as part of the procedure, or RA’s that may be impacted by that procedure.

<p>Lee Xanthakos SCE&G 1</p>	<p>No What does the term "shall be developed, and distributed" mean? More description is need to clarify if the RA is simply going to develop procedures and force feed them to others, or develop them openly and jointly with transmission owner/operator and other RAs?</p> <p>The drafting team must remember that it is simply illegal for some entities to give up any functional control to other – including those performing the RA function. Therefore the drafting team should be absolutely certain that the scope of this SAR does not develops such that a transmission owner or operator is required to receive authority or permission from the RA to perform functions delegated to them by their PSCs. For example, Transmission owners and operators may already have processes or procedures in place that conflict with the unique procedures developed by the RA. This SAR should make clear that in a situation like that, the RA does not have the authority to force the owner/operator to act in a way that conflicts with the rules set for him by his PSC.</p>
<p>Then entity performing the RA function isn’t expected to develop these procedures without input from the involved parties. The procedures being addressed here are those that involve adjacent RAs or RAs within an Interconnection or within a geographic area. Additional details will be developed by the Standards Drafting Team. If an entity can’t take certain actions under certain conditions, then these restrictions should be accurately reflected in any jointly developed procedures and in agreements that define authority and relationships with the RA.</p>	
<p>Steve Beuning Xcel Energy 6</p>	<p>No The point of the standard should be the desired outcome, not a process. This addition seems to be prescriptive of a process rather than a condition. Further, this requirement will slow the pace of innovation to a crawl while multiple RA committees ruminate.</p>
<p>The desired outcome is that the entity performing the RA function have identified and developed a set of procedures to address unique operating scenarios so that the RA is prepared to take action before a scenario arises. Procedures are documented proof that coordination has happened.</p> <p>If a procedure requires the involvement and agreement of multiple entities performing the RA function, then the procedure needs to be developed with involvement of all parties, otherwise, when it is time to implement the procedure, there may not be the level of commitment needed to take action.</p>	
<p>Roman Carter Southern Co Gen & Energy Mktg 3,5,6 Joel Dison SCGEM 3,5,6 Tony Reed SCGEM 3,5,6 Lucius Burris SCGEM 3,5,6</p>	<p>No Language should be included to cover relaying schemes, hardware requirements, protective procedures, etc as a part of the requirement.</p>

Consideration of Comments on Second Posting of Coordinate Operations SAR

Clifford Shephard SCGEM 3,5,6	
The procedures addressed in this requirement, are those procedures that require actions to protect the interconnected grid from voltage instability, cascading outages, or uncontrolled separation.	
Thomas Vandervort Trans Subcommittee	No 1)The TS recommends enhancing the requirement by giving examples as follows: . . . that address identified potential operating scenarios that include special protective procedures, automatic actions, hardware, special relaying schemes, etc, that may impact 2) However, the standard should not require the exchange of information that is not applicable; and the standard should be appropriately worded to avoid requiring ALL RAs to implement some procedure or hardware "just because another RA has it."
The procedures addressed in this requirement, are those procedures that require actions to protect the bulk transmission system such as: transferring an operating problem from one geographic area to another area; causing damage to critical equipment; or causing voltage instability, cascading outages, or uncontrolled separation. The list of items suggested by the TS goes beyond what was intended for this SAR and has not been adopted. This procedure does not require that any entity adopt a standard procedure, nor does it require the installation of any hardware or software.	
Robert Waldele NYISO 2	No Development of the standard should not require the exchange of information that is NOT applicable; the standard should be appropriately worded to avoid requiring ALL RAs to implement some procedure or hardware "just because another RA has it."
The procedures addressed in this requirement, are those procedures that require actions to protect the bulk transmission system such as: transferring an operating problem from one geographic area to another area; causing damage to critical equipment; or causing voltage instability, cascading outages, or uncontrolled separation. This procedure does not require that any entity adopt a standard procedure, nor does it require the installation of any hardware or software.	
Raj Rana AEP 1,3,5, 6	No Define "all involved parties". Confidentiality needs to be taken into account.
'Involved parties' addresses only entities performing reliability – related functions that have a direct involvement in an activity, and should not involve market functions.	
Linda Campbell FRCC Op & Eng Committee Paul Elwing Lakeland Elec 3 Marty Mennes FPL 1 Mark Bennett Gainesville 3 Roger Westphal Gainesville 3 Ben Sharma Kissimmee 3 Richard Gilbert Lakeland 3	No The RA certification SAR already has a requirements for operating procedures and processes for normal and emergency operations. Wouldn't a unique operating procedure fit in one of those categories already? If so, it seems like the essence of this requirement is to share it with all involved parties. And sharing results of analyses is a requirement later in this SAR that could be expanded to include sharing of procedures as appropriate.
While the RA Certification Criteria does require that procedures and processes be in place, certification is obtained before an entity can begin operating. Once an entity is certified and begins to operate, conditions may change that may initiate the need for the development of additional procedures. This requirement is intended to ensure that the entities performing the RA function keep developing these procedures as needed. Based on your comment, the SAR has been revised to indicate that the procedures need to be maintained.	
George Bartlett Entergy 1	No This Requirement appears to be new and not in keeping with the

Consideration of Comments on Second Posting of Coordinate Operations SAR

	<p>Functional Model, either the January, 2002 version, nor Draft 5: January, 2003 version. Per the Functional Model, RAs Develop Operating Reliability Limits, not "unique operating procedures". The RA "Coordinates reliability processes and actions with and among other Reliability Authorities."</p> <p>We suggest this Requirement be replaced with the following: "RA Coordination - The RA shall coordinate reliability processes and actions with and among other Reliability Authorities."</p>
<p>The functional model does not address all tasks that are involved in maintaining reliability. A procedure is a formal method of documenting a process with actions that is agreed upon in advance. Procedures are documented proof that coordination has happened.</p>	
Jim Griffith Southern Co 1	<p>No "involved parties" should be further defined. The sentence should be changed to say "distributed to the impacted RAs.</p>
<p>As used in this SAR, the term, 'involved parties' means those entities that have a direct involvement in an activity – those that are either required to take action or those that are impacted by such an action. If a procedure requires the involvement and agreement of multiple entities performing the RA function, then the procedure needs to be developed with involvement of all parties, otherwise, when it is time to implement the procedure, there may not be the level of commitment needed to take action.</p>	
Terry Bilke Midwest ISO 2	<p>Yes The procedures should be drafted with the input and agreement of the affected neighbors.</p>
<p>If a procedure requires the involvement and agreement of multiple entities performing the RA function, then the procedure needs to be developed with involvement of all parties, otherwise, when it is time to implement the procedure, there may not be the level of commitment needed to take action.</p>	
Ken Githens Allegheny Energy Supply 5	<p>Yes Having a resolution before it happens is better than attempting to resolve it as it is happening. Is it safe to assume that the impacted neighbor would have a say in development of these unique operating procedures?</p>
<p>If a procedure requires the involvement and agreement of multiple entities performing the RA function, then the procedure needs to be developed with involvement of all parties, otherwise, when it is time to implement the procedure, there may not be the level of commitment needed to take action.</p>	
John Blazekovich Exelon 1,3,5,6	<p>Yes We agree with the need for this requirement, suggest that the word "unique" be removed from this requirement.</p>
<p>The word, 'unique' did not seem to be adding any clarity to the SAR and it was removed.</p>	
Allan Silk MAPP Operating Subcommittee	<p>Yes</p>
William Smith Allegheny 1	<p>Yes</p>
Thomas Washburn OUC 3	<p>Yes</p>
Sam Jones ERCOT 2	<p>Yes</p>
Ross Owen Oncor 1	<p>Yes</p>
Ron Gunderson NBPD 1	<p>Yes</p>
Richard Schwarz PNSC 2	<p>Yes</p>
Peter Burke ATC 1	<p>Yes</p>
Mitchell Needham TVA Stuart Goza TVA 1 Gary Jackson TVA 6	<p>Yes</p>
Kathleen Goodman ISO New England 2	<p>Yes</p>
John Stickley AECI 1	<p>Yes</p>

Consideration of Comments on Second Posting of Coordinate Operations SAR

Jim Byrd Oncor 1	Yes
Guy Zito NPCC 2 Dan Stosick ISO NE 2 Roger Champagne HydroQuebec 1 Barry Gee Ngrid USA 1 David Kiguel HydroOne 1 Ralph Rufrano NYPA 1 Chuck Rusowicz Con Ed 1 Greg Campoli NYISO 2	Yes
Darrell Richardson Illinois Power 1, 3	Yes
Roger Green Southern Co Svcs SOCO Gen 5	Yes

Consideration of Comments on Second Posting of Coordinate Operations SAR

6. Do you agree with this requirement that the RA 'analyze maintenance outages?'

- Analyze Maintenance Outages
 - Analyze the impact of generation outages from a reliability perspective
 - Analyze the impact of transmission outages from a reliability

Summary Consideration:

The SAR has been revised to indicate that the analysis period will be from 12 months to real time. The Certification SAR DT has been asked to add a requirement that entities applying for RA certification have a procedure in place to resolve conflicts between generation and transmission outages within the RA's Area.

Steve Beuning Xcel Energy 6	<p>No</p> <p>This does nothing to solve the point of conflict between reliability and commercial operations. The standard should be expanded to address what to do about conflicts between the two types of outage. As an alternative, this standard could stipulate that planned generation outages shall be accommodated to the maximum extent possible, including RA obligation to defer planned transmission outages to maintain reliability in the face of conflict.</p>
<p>This requirement is not trying to solve the point of conflict between reliability and commercial operations, rather it is trying to ensure that known outages are considered in analyzing the expected system conditions.</p>	
<p>We've sent a note to the Certification SAR DT to ask that they add a requirement that a procedure be in place that identifies how the RA will resolve conflicts between generation and transmission outages within the RA's Area.</p>	
<p>The RA Certification criteria includes requirements that address having procedures in place to address coordination and approval of transmission outages and coordination of generation outages.</p>	
Jim Griffith Southern Co 1	<p>No</p> <p>The RAs should have a common process and standards to resolve the transmission outage coordination conflicts or problems. The RA has no authority over generation outages and must analyze concurrent generation outages.</p>
<p>The RA Certification criteria includes requirements that address having procedures in place to address coordination and approval of transmission outages and coordination of generation outages.</p>	
<p>We've sent a note to the Certification SAR DT to ask that they add a requirement that a procedure be in place that identifies how the RA will resolve conflicts between generation and transmission outages within the RA's Area.</p>	
George Bartlett Entergy 1	<p>No</p> <p>This Requirement does not belong in a SAR for the RAs to Coordinate Operations - RA to RA. Each RA performs these analyses but the analyses are not part of the RA to RA coordination.</p>
<p>This analysis must be done to ensure that the entity performing the RA function knows if there is an outage on its system that may impact other systems and therefore needs to be communicated to one or more other RAs.</p>	
Thomas Vandervort Trans Subcommittee	<p>No</p> <p>1) The TS recommends including language that addresses "time" in this requirement. TS suggestion: Analyze the impact of generation (transmission) outages from a reliability perspective on a real-time and future twelve month time line. 2) This requirement should also imply coordination (or comparison) of scheduled outages among</p>

Consideration of Comments on Second Posting of Coordinate Operations SAR

	interconnecting RAs.
The SAR has been revised to more clearly indicate that this requirement is addressing maintenance or construction outage analysis from real time through 12 months.	
Roman Carter Southern Co Gen & Energy Mktg 3,5,6 Joel Dison SCGEM 3,5,6 Tony Reed SCGEM 3,5,6 Lucius Burris SCGEM 3,5,6 Clifford Shephard SCGEM 3,5,6	No The Reliability Authority cannot dictate changes to the Generator outage schedules. Also, over what time period does this analysis cover, i.e., real-time or over the next 12 months.
This does not require that the entity performing the RA function dictate changes to Generator outage schedules.	
The SAR has been revised to more clearly indicate that this requirement is addressing maintenance or construction outage analysis from real time through 12 months.	
Robert Waldele NYISO 2	No Should this requirement also apply to the scheduling authority? This should require coordination (or comparison) of proposed scheduled outages among interconnecting RAs.
The Functional Model does not include a scheduling authority.	
Another requirement in this SAR addresses the sharing of information if that information concerns operational activities that will impact another RA's Area.	
Ken Githens Allegheny Energy Supply 5	No Are these planned and/or forced maintenance outages? How far in the future are the outages analyzed? What happens if the RA determines the outage causes problems? If the Transmission Owner or Generator have to reschedule, who will pay for any applicable costs associated with the reschedule. Generators have executed Interconnection and Operating Agreements with the Transmission Owner. If the RA is not the transmission owner, then this will be an additional obligation on the generator. This obligation could have adverse financial impact. This requirement if included need to be coordinated with FERC's ruling on the Generator Interconnection NOPR.
The SAR has been revised to more clearly indicate that this requirement is addressing maintenance or construction outage analysis from real time through 12 months.	
We've sent a note to the Certification SAR DT to ask that they add a requirement that a procedure be in place that identifies how the RA will resolve conflicts between generation and transmission outages within the RA's Area.	
Addressing the costs associated with cancellations or postponements is a Tariff issue and is beyond the scope of the SAR DT.	
Raj Rana AEP 1,3,5, 6	Yes AEP generally agrees with this requirement. However, we believe this requirement should go even further and state that the RA is to analyze the impact of generation maintenance outages and approve said outages. The RA needs to have the authority to cancel work of a non-emergency nature when that work impacts the reliability of the grid, with impacting being defined as in note 1. This requirement also has to encompass all generators (ie. IPPs) not just utility generators.

Consideration of Comments on Second Posting of Coordinate Operations SAR

Giving the RA the authority to cancel generator outages is outside the scope of the authority given the RA in the Functional Model.	
Terry Bilke Midwest ISO 2	Yes Recommend additional wording in this requirement that all generator and transmission owners within an RA's footprint provide outage information coincident with the RA's planning cycles.
The RA Certification criteria includes requirements that address having procedures in place to address coordination and approval of transmission outages and coordination of generation outages.	
Guy Zito NPCC 2 Dan Stosick ISO NE 2 Roger Champagne HydroQuebec 1 Barry Gee Ngrid USA 1 David Kiguel HydroOne 1 Ralph Rufrano NYPA 1 Chuck Rusowicz Con Ed 1 Greg Campoli NYISO 2	Yes We suggest broadening the meaning of transmission outages to include protection system outages and special protection system (SPS) outages.
Adding the details to more clearly identify the meaning of transmission outages will be addressed by the Standards Drafting Team.	
Darrell Richardson Illinois Power 1, 3	Yes However, this does not describe how the RA will interact with the TSP, TO or the Generator nor does it describe the level of authority the RA has in reacting to Generator or Transmission Operator changes. For example, the MISO Outage Coordination Policy describes how generator or transmission outage changes requested by MISO or the transmission customer are handled but it does not cover changes to outages made by the Generator or Transmission Operator.
The RA Certification criteria includes requirements that address having procedures in place to address coordination and approval of transmission outages and coordination of generation outages.	
Lee Xanthakos SCE&G 1	Yes
Allan Silk MAPP Operating Subcommittee	Yes
Sam Jones ERCOT 2	Yes
Ross Owen Oncor 1	Yes
Ron Gunderson NBPD 1	Yes
Richard Schwarz PNSC 2	Yes
William Smith Allegheny 1	Yes
Thomas Washburn OUC 3	Yes
Peter Burke ATC 1	Yes
Mitchell Needham TVA Stuart Goza TVA 1 Gary Jackson TVA 6	Yes
Linda Campbell FRCC Op & Eng Committee Paul Elwing Lakeland Elec 3 Marty Mennes FPL 1 Mark Bennett Gainesville 3 Roger Westphal Gainesville 3 Ben Sharma Kissimmee 3 Richard Gilbert Lakeland 3	Yes

Consideration of Comments on Second Posting of Coordinate Operations SAR

Roger Green Southern Co Sves SOCO Gen 5	Yes
Kathleen Goodman ISO New England 2	Yes
John Stickley AECI 1	Yes
John Blazekovich Exelon 1,3,5,6	Yes
Jim Byrd Oncor 1	Yes

Consideration of Comments on Second Posting of Coordinate Operations SAR

<p>7. Do you agree with this requirement that the RA 'perform security analyses?'</p>	<ul style="list-style-type: none"> ▪ Perform Security Analyses The RA shall ensure that reliability analyses (including but not limited to a day-ahead analysis) are performed for all Transmission Operators (TOP's) in its Reliability Area and that such analysis is coordinated with similar analysis performed by neighboring RA's. The purpose of these analyses is to look at the impact of one RA's system on other systems and to assure that the interconnected bulk power system can be operated in both anticipated normal and contingency conditions.
<p>Thomas Vandervort Trans Subcommittee</p>	<p>No There is a discrepancy between the requirement title language "security analyses" and the first line "reliability analyses." The TS suggest changing "security analyses" to "reliability analyses" as security analyses is too specific and tends to have the connotation of a single contingency or implies use of a specific EMS analysis tool.</p>
<p>The SAR has been revised to say, 'reliability' analyses throughout.</p>	
<p>Robert Waldele NYISO 2</p>	<p>No Is this requirement intended to imply use of specific EMS software ("Security Analysis") tools or be limited solely to real-time analysis? The requirement needs clarification. Is the standard intended to require the RA to perform the analysis as a substitute for the TO performing analysis, or to supplement that analysis?</p>
<p>The SAR has been revised to say, 'reliability' analyses throughout.</p>	
<p>The SAR does not require use of a specific EMS software tool and is not limited to just real-time analysis. Nor is the SAR intending to replace the TOP's need to analyze its system.</p>	
<p>George Bartlett Entergy 1</p>	<p>No We think this SAR should not be limited to RA to RA. However, since it is limited to RA to RA, this Requirement does not belong in a SAR for the RAs to Coordinate Operations - RA to RA. Each RA performs these analyses but the analyses are not part of the RA to RA coordination.</p>
<p>Reliability Analyses must be done to ensure that the entity performing the RA function knows if there are or will be conditions on its system that may impact other systems and therefore needs to be communicated to one or more other RAs.</p>	
<p>Roman Carter Southern Co Gen & Energy Mktg 3,5,6 Joel Dison SCGEM 3,5,6 Tony Reed SCGEM 3,5,6 Lucius Burris SCGEM 3,5,6 Clifford Shephard SCGEM 3,5,6</p>	<p>No Are Security analyses the same as the Reliability analyses. Some would disagree. Therefore, the use of the word Reliability analyses should be used in both places.</p>
<p>The SAR has been revised to say, 'reliability' analyses throughout.</p>	
<p>Jim Griffith Southern Co 1</p>	<p>No The sentence should be rewritten saying that the analysis should be distributed to the TOPs and the adjacent control areas. Also, the purpose of the analysis should be to look at the impact of one RAs system on neighboring systems.</p>

Consideration of Comments on Second Posting of Coordinate Operations SAR

The analysis done by the RA for the RA's own Area will be communicated to the RA's TOPs and BAs (rather than control areas) as a requirement in the "Operate Within Limits" standard.	
The purpose of the analysis should be to look at the impact on one RA's system on other systems which includes neighbor systems.	
Steve Beuning Xcel Energy 6	Yes The security analysis should also include assessment of deliverability of operating reserves for generation contingency and use of operating reserves for special grid operating procedures.
The new standards do not include any reserve requirements and do not specify what actions to take to balance resources and demand.	
Ron Gunderson NBPD 1	Yes The SAR should clarify that when doing the reliability analyses that known outages in other RA's are included in the analyses.
There is a requirement in the "Monitor and Assess Short-term Transmission Reliability - Operate Within Limits" standard that includes this. (Requirement 203 in Version A of the draft standard)	
Sam Jones ERCOT 2	Yes ERCOT staff agrees with this requirement, but recognizes an Interconnection Difference. In a Single Point Of Control Interconnection, such as ERCOT, the RA will perform the analysis for its Interconnection, but will not be performing this requirement to look for impact on other systems as there are no other systems in the Interconnection.
The Interconnection Difference noted does not seem to be in conflict with anything in the SAR.	
Raj Rana AEP 1,3,5, 6	Yes The purpose of the analysis should also include the development of mitigation plans as appropriate. Additionally, it needs to be clear that the RA has the authority to cancel work based upon these analyses, if the result of the analyses is that proposed work could lead to instability, uncontrolled separation or cascading outages on the interconnected bulk transmission system. This requirement should be consistent with trading/scheduling practices of the region (must include a timeframe for region and include all generators)
The development of a mitigation plan is addressed in the "Monitor and Assess Short-term Transmission Reliability - Operate Within Limits" standard.	
The RA's authority is addressed in the RA Certification SAR.	
Addressing trading practices is outside the scope of the SAR DT.	
Linda Campbell FRCC Op & Eng Committee Paul Elwing Lakeland Elec 3 Marty Mennes FPL 1 Mark Bennett Gainesville 3 Roger Westphal Gainesville 3 Ben Sharma Kissimmee 3 Richard Gilbert Lakeland 3	Yes However, the wording (shall ensure) may need to be clarified. When reading this, you could ask the question, "Who is performing the analyses, the RA, the TOP(s) or both?"
The "Monitor and Assess Short-term Transmission Reliability - Operate Within Limits" standard addresses which functions are responsible for performing the analyses, and the subject language has been removed from this SAR. The words, 'shall ensure' have been removed from the SAR.	

Consideration of Comments on Second Posting of Coordinate Operations SAR

John Blazekovich Exelon 1,3,5,6	Yes The purpose of the Security Analysis should not be included in this requirement. If the "purpose sentence" is intended to state the minimum criteria of Security Analysis, it should clearly state that, i.e. "At a minimum the security analysis shall demonstrate that the RA's system and other impacted systems can be operated in both anticipated normal and contingency conditions."
The SAR has been revised to remove the purpose statement.	
Lee Xanthakos SCE&G 1	Yes
Allan Silk MAPP Operating Subcommittee	Yes
Ross Owen Oncor 1	Yes
William Smith Allegheny 1	Yes
Thomas Washburn OUC 3	Yes
Terry Bilke Midwest ISO 2	Yes
Richard Schwarz PNSC 2	Yes
Peter Burke ATC 1	Yes
Mitchell Needham TVA Stuart Goza TVA 1 Gary Jackson TVA 6	Yes
Ken Githens Allegheny Energy Supply 5	Yes
Kathleen Goodman ISO New England 2	Yes
John Stickley AECI 1	Yes
Jim Byrd Oncor 1	Yes
Guy Zito NPCC 2 Dan Stosick ISO NE 2 Roger Champagne HydroQuebec 1 Barry Gee Ngrid USA 1 David Kiguel HydroOne 1 Ralph Rufrano NYPA 1 Chuck Rusowicz Con Ed 1 Greg Campoli NYISO 2	Yes
Roger Green Southern Co Sves SOCO Gen 5	Yes
Darrell Richardson Illinois Power 1, 3	Yes

Consideration of Comments on Second Posting of Coordinate Operations SAR

8. Do you agree with this requirement that the RA 'perform generation resource availability analyses?'

- Perform Generation Resource Availability Analyses
Each RA shall analyze generation resource availability for its impact

Thomas Vandervort Trans Subcommittee	No The TS suggests adding: 1) either "and operating margins" or "and reserves" after the sub-bullet words - generation resource, 2) incorporate a "time" parameter (see 6. above), 3) what is the RA "coordinating" - summer studies, 5-yr, 10-yr, GADS performance data, if so then include the language into the requirement?
This SAR does not address the collection of GADS data.	
Roman Carter Southern Co Gen & Energy Mktg 3,5,6 Joel Dison SCGEM 3,5,6 Tony Reed SCGEM 3,5,6 Lucius Burris SCGEM 3,5,6 Clifford Shephard SCGEM 3,5,6	No Over what timeframe does the analysis performed cover.
The SAR has been revised to more clearly state that the analyses are performed for current and next day.	
Robert Waldele NYISO 2	No In what time-frame is the RA being required to perform the analysis? Is this intended to supplement longer term resource planning assessment that is the responsibility of the Planning Authority. Will this require the RA to become the vehicle for collection, analysis, and interpretation of GADS data?
This SAR does not address the collection of GADS data.	
Raj Rana AEP 1,3,5, 6	No Requirement is too vague. Additionally, the requirement should state what action the RA is to take if reserves are found to be inadequate.
Performance associated with balancing resources and demand are addressed in the Balance Resources and Demand standard.	
George Bartlett Energy 1	No We think this SAR should not be limited to RA to RA. However, since it is limited to RA to RA, this Requirement does not belong in a SAR for the RAs to Coordinate Operations - RA to RA. Each RA performs these analyses but the analyses are not part of the RA to RA coordination.
Reliability Analyses must be done to ensure that the entity performing the RA function knows if there are or will be conditions on its system that may impact other systems and therefore needs to be communicated to one or more other RAs.	
Steve Beuning Xcel Energy 6	Yes Inter-RA coordination could ensure no double-counting of available capacity. Also the horizon of analysis should be constrained to a reasonable, practical and relevant time horizon. This analysis is not a daily look for the next 10 years. Something in the day-ahead to day-of analysis performed on a shapshot basis is sufficient. This aspect is silent about what to do if bad impacts are identified, again this seems like the proposed language describes a process instead of a condition or outcome.
The SAR has been revised to more clearly state that the analyses are performed for current and next day.	

Consideration of Comments on Second Posting of Coordinate Operations SAR

Ron Gunderson NBPD 1	Yes Please clarify that the analysis is not only for resource adequacy but also on the impacts of generator outages on the reliability of the transmission system. Too many generator outages at the wrong time may lead to reliability problems on the transmission system (it may not be able to handle the necessary imports to replace the off-line generation).
The SAR has been revised to more specifically state that known generation and transmission outages shall be considered in the analyses.	
Thomas Washburn OUC 3	Yes Impact on what? Is something missing or a period missing?
The phrase has been removed from the revised SAR.	
Mitchell Needham TVA Stuart Goza TVA 1 Gary Jackson TVA 6	Yes Although this might be reworded ...availability for reliability exposure
The SAR has been revised to clarify that these analyses are conducted for reliability.	
Kathleen Goodman ISO New England 2	Yes What if a centralized unit commitment is not done?
Specifying what tool to use for analyses is beyond the scope of the SAR.	
Jim Griffith Southern Co 1	Yes Common standards of this accounting should be uniform among RAs.
Specifying common accounting process is beyond the scope of this SAR.	
Linda Campbell FRCC Op & Eng Committee Paul Elwing Lakeland Elec 3 Marty Mennes FPL 1 Mark Bennett Gainesville 3 Roger Westphal Gainesville 3 Ben Sharma Kissimmee 3 Richard Gilbert Lakeland 3	Yes However, this is somewhat open or broad. It says to analyze generation resource availability for its impact, but to what?
The SAR has been revised to clarify that these analyses are conducted for reliability.	
Ken Githens Allegheny Energy Supply 5	Yes For what time frame will the analysis be done? What types of coordination is needed between RAs? If one is short, will it have the authority to order generation output from another RA?
The SAR has been revised to more clearly state that the analyses are reliability-related and are performed for current and next day. The SAR does not give a RA any authority to direct other RAs to take actions. The Functional Model does not grant the entity performing the RA function the authority to direct other entities performing RA functions.	
Darrell Richardson Illinois Power 1, 3	Yes We agree that this should be done, but it does not address the authority of the RA to implement changes nor does it address what happens when a Generator changes the plan.
The authority of the RA is addressed as an element in the RA Certification SAR.	
Roger Green Southern Co Svs SOCO Gen 5	Yes
Lee Xanthakos SCE&G 1	Yes
Allan Silk MAPP Operating Subcommittee	Yes
William Smith Allegheny 1	Yes

Consideration of Comments on Second Posting of Coordinate Operations SAR

Terry Bilke Midwest ISO 2	Yes
Sam Jones ERCOT 2	Yes
Ross Owen Oncor 1	Yes
Richard Schwarz PNSC 2	Yes
Peter Burke ATC 1	Yes
John Stickley AECI 1	Yes
John Blazekovich Exelon 1,3,5,6	Yes
Jim Byrd Oncor 1	Yes
Guy Zito NPCC 2 Dan Stosick ISO NE 2 Roger Champagne HydroQuebec 1 Barry Gee Ngrid USA 1 David Kiguel HydroOne 1 Ralph Rufrano NYPA 1 Chuck Rusowicz Con Ed 1 Greg Campoli NYISO 2	Yes

Consideration of Comments on Second Posting of Coordinate Operations SAR

9. Do you agree with this requirement that the RA 'share results of analyses?'

- Share Results of Analyses
The RA shall share the results of its system analyses, when conditions¹ warrant, or upon request, with other RA's, and other involved entities within its Interconnection.

Summary Consideration:

The SAR has been revised to eliminate the reference to Interconnection, and to clarify that the RA may limit the sharing of the results of its system analyses based on the FERC Code of Conduct and other Confidentiality Agreements.

Steve Beuning Xcel Energy 6	No Who are the other involved entities? At a minimum (even though this is a reliability forum) there should be a means to indicate respect for and compliance with the need to maintain commercially sensitive information in a confidential manner.
For the purpose of this requirement in this SAR, 'other entities' are those that would be performing reliability functions, not market functions. The SAR has been revised to indicate that sharing this information would be subject to the FERC Code of Conduct.	
Thomas Vandervort Trans Subcommittee	No First sub-bullet, the TS recommends the deletion of "within its Interconnection" - since the language does not add to the requirement. Other RAs, and other involved entities outside of its Interconnection should be granted access to the analysis if "lessons learned" can be beneficial.
This requirement is looking forward, not backwards, so it doesn't involve 'lessons learned.' The SAR has been modified to eliminate the reference, 'within the Interconnection.'	
George Bartlett Energy 1	No In general, we agree with this Requirement. However, the statements are too broad. Our concerns are: what are the analyses - the results of which are going to be shared, what entities are the results to be shared with "upon request", and the phrase "and other involved entities within its Interconnection". We suggest the following Requirement to wholly replace the existing draft: "Share Results of Analyses - The RA shall share the results of its system analyses, when conditions warrant, with Transmission Service Providers, Balancing Authorities, and other RAs." Note: we included entities other than RAs so the needed sharing of results does not get lost in the multiple SAR development.
Under some circumstances, the RA may need to share results of analyses with other functions, such as the TOP or the Generator. The SAR has been modified to eliminate the reference, 'within the Interconnection.'	
Robert Waldele NYISO 2	No Sharing of results of studies should not be limited to "within its interconnection."
The SAR has been modified to eliminate the reference, 'within the Interconnection.'	
Raj Rana AEP 1,3,5, 6	No A qualified no. We believe as worded the phrase "and other involved entities" is too wide open. Define "other entities." It needs to be qualified to indicate that results will be shared within FERC Code of Conduct guidelines, that is results will not be shared with PSE's and others engaged in the marketing function. What kind of results? - too

Consideration of Comments on Second Posting of Coordinate Operations SAR

	vague - please explain. If the results are not just shared between RA to RA, then need confidentiality agreements.
<p>For the purpose of this requirement in this SAR, 'other entities' are those that would have direct involvement, and is limited to those performing reliability functions, not market functions. The SAR has been revised to indicate that sharing this information would be subject to the FERC Code of Conduct.</p> <p>Defining how the results will be presented to others is outside the scope of what will be addressed by the SAR, and may be beyond the scope of what will be defined within the requirements of the standard.</p>	
Jim Griffith Southern Co 1	No RAs should always share the results with control areas and transmission providers within its borders. It should always share these results with adjacent RAs. Analysis data should be made available to all RAs.
<p>Under the Functional Model, the Control Area is not a 'function', so this SAR will not include the term, 'Control Area.'</p> <p>This SAR is limited to RA to RA coordination, and doesn't address coordination between the RA and its lower level functions (such as its TSPs.)</p> <p>The SAR does state that analysis data shall be shared with other RAs.</p>	
Terry Bilke Midwest ISO 2	Yes Would recommend wording that parties other than RAs that receive this information are subject to the terms of Appendix 4B or its successor documents.
<p>For the purpose of this requirement in this SAR, 'other entities' are those that would be performing reliability functions, not market functions. The SAR has been revised to indicate that sharing this information would be subject to the FERC Code of Conduct.</p> <p>At this point, it isn't clear what will happen to existing Operating Policy Appendix 4B.</p>	
Richard Schwarz PNSC 2	Yes Other involved entities must be entities a RA can exchange information with without violating its confidentiality agreements
<p>For the purpose of this requirement in this SAR, 'other entities' are those that would be performing reliability functions, not market functions. The SAR has been revised to indicate that sharing this information would be subject to the FERC Code of Conduct and other Confidentiality Agreements..</p>	
Mitchell Needham TVA Stuart Goza TVA 1 Gary Jackson TVA 6	Yes This might be reworded to say appropriate entities or some such, particularly in light of confidentiality issues.
<p>For the purpose of this requirement in this SAR, 'other entities' are those that would be performing reliability functions, not market functions. The SAR has been revised to indicate that sharing this information would be subject to the FERC Code of Conduct.</p>	

Consideration of Comments on Second Posting of Coordinate Operations SAR

Linda Campbell FRCC Op & Eng Committee Paul Elwing Lakeland Elec 3 Marty Mennes FPL 1 Mark Bennett Gainesville 3 Roger Westphal Gainesville 3 Ben Sharma Kissimmee 3 Richard Gilbert Lakeland 3	Yes See comment to question number 5. <i>{The RA certification SAR already has a requirements for operating procedures and processes for normal and emergency operations. Wouldn't a unique operating procedure fit in one of those categories already? If so, it seems like the essence of this requirement is to share it with all involved parties. And sharing results of analyses is a requirement later in this SAR that could be expanded to include sharing of procedures as appropriate.}</i> Also, any sharing of information whether it is results of analyses or data, shall be governed by the applicable confidentiality agreements.
Sharing results of analyses is done in response to actual or potential conditions whereas sharing in the development of procedures is done in advance of a defined situation and is a different type of coordination.	
For the purpose of this requirement in this SAR, 'other entities' are those that would be performing reliability functions, not market functions. The SAR has been revised to indicate that sharing this information would be subject to the FERC Code of Conduct and other Confidentiality Agreements.	
Ken Githens Allegheny Energy Supply 5	Yes We have concerns with whom this information is shared with? The RA will sign a code of conduct agreement and NERC confidentiality, but who is to say that the other parties or entities who are allowed to view these results are held to the same confidentiality.
For the purpose of this requirement in this SAR, 'other entities' are those that would be performing reliability functions, not market functions. The SAR has been revised to indicate that sharing this information would be subject to the FERC Code of Conduct and other Confidentiality Agreements.	
Roger Green Southern Co Sves SOCO Gen 5	Yes
Lee Xanthakos SCE&G 1	Yes
Allan Silk MAPP Operating Subcommittee	Yes
William Smith Allegheny 1	Yes
Thomas Washburn OUC 3	Yes
Sam Jones ERCOT 2	Yes
Ross Owen Oncor 1	Yes
Ron Gunderson NBPD 1	Yes
Roman Carter Southern Co Gen & Energy Mktg 3,5,6 Joel Dison SCGEM 3,5,6 Tony Reed SCGEM 3,5,6 Lucius Burris SCGEM 3,5,6 Clifford Shephard SCGEM 3,5,6	Yes
Peter Burke ATC 1	Yes
Kathleen Goodman ISO New England 2	Yes
John Stickley AECI 1	Yes
John Blazekovich Exelon 1,3,5,6	Yes
Jim Byrd Oncor 1	Yes
Guy Zito NPCC 2	Yes

Consideration of Comments on Second Posting of Coordinate Operations SAR

Dan Stosick ISO NE 2 Roger Champagne HydroQuebec 1 Barry Gee Ngrid USA 1 David Kiguel HydroOne 1 Ralph Rufrano NYPA 1 Chuck Rusowicz Con Ed 1 Greg Campoli NYISO 2	
Darrell Richardson Illinois Power 1, 3	Yes

Consideration of Comments on Second Posting of Coordinate Operations SAR

10. Do you agree with this requirement that the RA 'communicate with others?'

Summary Consideration:

The SAR has been modified:

- To delete the reference,
- 'within the same Interconnection'
- To clarify the types of IT outages being addressed
- To merge this requirement with the requirement for coordinating actions

- Communicate with Others
 - The RA shall notify other impacted RA's under the following circumstances:
 - If a generator or transmission outage will impact another RA within the same Interconnection
 - If outages of information technology (IT) systems (telemetry, communications, and/or control equipment or other information systems) impact the ability of one RA to receive/send data or voice communications
 - If the results of analyses or real-time conditions indicate potential or actual reliability problems
 - If the actual interconnection frequency is outside the defined interconnection frequency limits

Thomas Vandervort Trans Subcommittee	No First sub-bullet, the TS recommends the deletion of "within its Interconnection" - since the language does not add to the requirement. Other RAs, and other involved entities outside of its Interconnection should be granted access to the analysis if "lessons learned" can be beneficial.
The SAR has been modified to delete the reference, 'within the same Interconnection'.	
Roman Carter Southern Co Gen & Energy Mktg 3,5,6 Joel Dison SCGEM 3,5,6 Tony Reed SCGEM 3,5,6 Lucius Burris SCGEM 3,5,6 Clifford Shephard SCGEM 3,5,6	No Do RAs coordinate IT outages with other RAs.
If the outage impacts the elimination of a communication channel, it could impact a special protection scheme. This type of outage should be communicated under this standard.	
Robert Waldele NYISO 2	No Similar concern as #9 above. (Sharing of results of studies should not be limited to "within its interconnection.")
The SAR has been modified to delete the reference, 'within the same Interconnection'.	
Raj Rana AEP 1,3,5, 6	No The requirement regarding IT outages is too broad. Suggested re-wording: "If outages of information technology (IT) systems (telemetry, communications, and/or control equipment or other information systems) prevent a RA from performing a security analysis of their system, and, thus, potentially jeopardizing the interconnected bulk transmission system." What are the defined interconnection frequency limits? RA can get BA to give status of all generation and then communicate that information to RA.
The SAR has been modified to more clearly state that the intent is to focus on loss of IT systems that would prevent an RA from performing a reliability analysis or from communicating with other RAs.	
Jim Griffith Southern Co 1	No This requirement should also include physical security information. The outages of information technology, etc. should not be limited to this examples.
There is another SAR being developed to address response to real or potential acts of terrorism that impact critical physical infrastructure.	

Consideration of Comments on Second Posting of Coordinate Operations SAR

Linda Campbell FRCC Op & Eng Committee Paul Elwing Lakeland Elec 3 Marty Mennes FPL 1 Mark Bennett Gainesville 3 Roger Westphal Gainesville 3 Ben Sharma Kissimmee 3 Richard Gilbert Lakeland 3	Yes This is the requirement that really made us wonder why is this limited to only RA's? The communication needs to be with other reliability functions such as the BA, TOP, TSP, generator and others as identified in the functional model.
The subheading for this requirement has been revised to clarify that this is addressing communication between RAs. Communication between the RA and its lower level functions is necessary. The responsibility to communicate with lower level functions should be addressed as a requirement in the RA Certification process.	
Ken Githens Allegheny Energy Supply 5	Yes If generator or transmission outage causes an reliability impact on the another RA, what happens? Not sure what is meant in the first sub-bullet by the wording "will impact another RA within the same Interconnection". Does Interconnection mean the Eastern Interconnection as opposed to the Western Interconnection.
The SAR has been modified to delete the reference, 'within the same Interconnection'.	
Kathleen Goodman ISO New England 2	Yes Would transformer, phase angle regulators, reactive devices, special protection schemes be considered a "transmission outage?" Would a better term be "transmission element outage" to cover such situations?
The Standards Drafting Team will add details to identify the breadth of outages covered by the term, 'transmission'. Your comment will be forwarded to the Standards Drafting Team for their consideration as they work to more fully define the requirements.	
John Blazekovich Exelon 1,3,5,6	Yes Bullet #3 requires the RA to communicate with others if an RA loses communication that impacts the ability of the RA to receive/send data. This requirement has the potential to be burdensome if an RA were required to communicate with others every time they lose any of their data. A qualifier of "critical data" should be added to the requirement.
Your comment will be forwarded to the Standards Drafting Team for their consideration as they work to more fully define the requirements.	
Guy Zito NPCC 2 Dan Stosick ISO NE 2 Roger Champagne HydroQuebec 1 Barry Gee Ngrid USA 1 David Kiguel HydroOne 1 Ralph Rufrano NYPA 1 Chuck Rusowicz Con Ed 1 Greg Campoli NYISO 2	Yes Yes, but it was felt that the term transmission outage should be broadened to encompass other transmission facilities such as phase angle regulators, SPSs, SVCs etc. Perhaps Transmission Facilities Outage might be a better description. This would ensure the status of critical control devices is communicated between the RAs.
The Standards Drafting Team will add details to identify the breadth of outages covered by the term, 'transmission'. Your comment will be forwarded to the Standards Drafting Team for their consideration as they work to more fully define the requirements.	
Roger Green Southern Co Svcs SOCO Gen 5	Yes
Lee Xanthakos SCE&G 1	Yes
Allan Silk MAPP Operating	Yes

Consideration of Comments on Second Posting of Coordinate Operations SAR

Subcommittee	
Steve Beuning Xcel Energy 6	Yes
William Smith Allegheny 1	Yes
Thomas Washburn OUC 3	Yes
Terry Bilke Midwest ISO 2	Yes
Sam Jones ERCOT 2	Yes
Ross Owen Oncor 1	Yes
Ron Gunderson NBPD 1	Yes
Richard Schwarz PNSC 2	Yes
Peter Burke ATC 1	Yes
Mitchell Needham TVA Stuart Goza TVA 1 Gary Jackson TVA 6	Yes
John Stickley AECI 1	Yes
Jim Byrd Oncor 1	Yes
George Bartlett Entergy 1	Yes
Darrell Richardson Illinois Power 1, 3	Yes

Consideration of Comments on Second Posting of Coordinate Operations SAR

11. Do you agree with this requirement that the RA 'act with others?'

Summary Consideration:
 This requirement was merged with the requirement for communicating with others. The requirement to implement solutions has been revised to clarify that the RA may implement solutions by acting or directing others to act.

- Act with Others
 - Communicate with other RA's to identify and implement a solution to prevent/resolve actual/impending operating problems such as:
 - Reliability problems that can't be resolved through existing procedures
 - Interconnection frequency exceeding interconnection frequency limit
 - Prioritization of transmission outages
 - Prioritization of IT outages

Lee Xanthakos SCE&G 1	No Not all regions have a mechanism in place that allows an RA to implement any solutions. We currently work under the jurisdictional requirements that call for the transmission owner/operator to implement such a solution.
The SAR has been revised to more narrowly define this requirement as communication between RAs. The SAR has been revised to clarify that the RA may act or direct others to act to implement solutions.	
Thomas Vandervort Trans Subcommittee	No The TS questions whether the "Prioritization of IT outages" requirement is a RA to RA coordination requirement. The TS could not conceptualize RAs prioritizing IT outages. The TS recommends either enhancing the requirement or deleting it.
For the purpose of this SAR, outages of information technology (IT) systems that need to be prioritized between RAs (telemetry, communications, and/or control equipment or other information systems) are those that may prevent an RA from performing a reliability analysis of its RA or impact the ability of an RA to receive/send data or voice communications to another RA.	
Roman Carter Southern Co Gen & Energy Mktg 3,5,6 Joel Dison SCGEM 3,5,6 Tony Reed SCGEM 3,5,6 Lucius Burris SCGEM 3,5,6 Clifford Shephard SCGEM 3,5,6	No Is prioritizing "IT outages" from RA to RA a coordination requirement.
For the purpose of this SAR, outages of information technology (IT) systems that need to be prioritized between RAs (telemetry, communications, and/or control equipment or other information systems) are those that may prevent an RA from performing a reliability analysis of its RA or impact the ability of an RA to receive/send data or voice communications to another RA.	
Robert Waldele NYISO 2	No NYISO is concerned with the implied scope of "IT outages" and the level of information. Generalizing certain forms of power system-related communication facilities under an "IT umbrella" might serve to "trivialize" issues like protection communication applications and forms of real-time metering.
For the purpose of this SAR, outages of information technology (IT) systems that need to be prioritized between RAs (telemetry, communications, and/or control equipment or other information systems) are those that may prevent an RA from performing a reliability analysis of its RA or impact the ability of an RA to receive/send data or voice communications to another RA. Additional details for what may constitute an IT outage will be added by the Standards Drafting Team.	
Raj Rana AEP 1,3,5, 6	No

Consideration of Comments on Second Posting of Coordinate Operations SAR

	Need to expand on the prioritization of IT and transmission outages. What are the defined interconnection frequency limits?
For the purpose of this SAR, outages of information technology (IT) systems that need to be prioritized between RAs (telemetry, communications, and/or control equipment or other information systems) are those that may prevent an RA from performing a reliability analysis of its RA or impact the ability of an RA to receive/send data or voice communications to another RA.	
Defined interconnection frequency limits are being addressed in the Balance Resources and Demand Standard under development.	
Linda Campbell FRCC Op & Eng Committee Paul Elwing Lakeland Elec 3 Marty Mennes FPL 1 Mark Bennett Gainesville 3 Roger Westphal Gainesville 3 Ben Sharma Kissimmee 3 Richard Gilbert Lakeland 3	No We agree with the items in this requirement, but it should be combined with the requirement in number 10 above. Act with others is the heading, but the actions taken start off with communication.
The SAR has been modified as suggested to combine these requirements under a single heading.	
Jim Griffith Southern Co 1	No Physical security actions which might jeopardize critical infrastructure should also be communicated. The sentence should reflect that all communications should be in a timely matter.
This should be addressed in the SAR that addresses Prepare for And Respond to Abnormal and Emergency Conditions.	
Steve Beuning Xcel Energy 6	Yes The frequency coordination issue may be partially addressed by the NERC Balance Resources and Demand Standards Drafting Team and should be coordinated with them.
The Balance Resources and Demand Standard implies, but does not specifically require coordination between RAs.	
Thomas Washburn OUC 3	Yes Should actual/impending be changed to impending/actual, because prevent goes with impending?
The SAR has been revised to reflect this suggestion.	
Ron Gunderson NBPD 1	Yes Prioritization of Generator outages should also be included on this list.
The RA does not have authority to approve generator outages – that is why it is not included on this list.	
John Blazekovich Exelon 1,3,5,6	Yes Suggest bullet #2 be restated as "Reliability problems that require the initiation/coordination of Operating Procedures or the development of new or temporary procedures."
The SAR has been revised to adopt the suggested language.	
Darrell Richardson Illinois Power 1, 3	Yes This does raise the question of how this is implemented. In other words, if the RA's involved can't come to a resolution, how is the situation resolved?
The SAR has been revised to add the following language:	
The standard shall address appropriate actions when RAs cannot agree upon the most appropriate solution for an impending or actual problem.	
Guy Zito NPCC 2	Yes

Consideration of Comments on Second Posting of Coordinate Operations SAR

<p>Dan Stosick ISO NE 2 Roger Champagne HydroQuebec 1 Barry Gee Ngrid USA 1 David Kiguel HydroOne 1 Ralph Rufrano NYPA 1 Chuck Rusowicz Con Ed 1 Greg Campoli NYISO 2</p>	<p>The bullet "Implement Interconnection-Wide transmission reliability preservation procedures in conjunction with all RA's in that Interconnection" appears to have been omitted. This should remain in the SAR. We suggest broadening the meaning of transmission outages to include protection system outages and special protection systems (SPS) outages or adding a bullet; -Prioritization of protection systems or SPS outages</p>
<p>The bullet, "Implement Interconnection -Wide transmission reliability preservation procedures in conjunction with all RA's in that Interconnection" was not deliberately omitted when the SAR Comment Form was developed – this was done in error, and will remain in the SAR.</p>	
<p>The Standards Drafting Team will add details to identify the breadth of outages covered by the term, 'transmission outages'. Your comment will be forwarded to the Standards Drafting Team for their consideration as they work to more fully define the requirements.</p>	
<p>Roger Green Southern Co Svs SOCO Gen 5</p>	<p>Yes</p>
<p>Allan Silk MAPP Operating Subcommittee</p>	<p>Yes</p>
<p>William Smith Allegheny 1</p>	<p>Yes</p>
<p>Terry Bilke Midwest ISO 2</p>	<p>Yes</p>
<p>Sam Jones ERCOT 2</p>	<p>Yes</p>
<p>Ross Owen Oncor 1</p>	<p>Yes</p>
<p>Richard Schwarz PNSC 2</p>	<p>Yes</p>
<p>Peter Burke ATC 1</p>	<p>Yes</p>
<p>Mitchell Needham TVA Stuart Goza TVA 1 Gary Jackson TVA 6</p>	<p>Yes</p>
<p>Ken Githens Allegheny Energy Supply 5</p>	<p>Yes</p>
<p>Kathleen Goodman ISO New England 2</p>	<p>Yes</p>
<p>John Stickley AECI 1</p>	<p>Yes</p>
<p>Jim Byrd Oncor 1</p>	<p>Yes</p>
<p>George Bartlett Entergy 1</p>	<p>Yes</p>

Consideration of Comments on Second Posting of Coordinate Operations SAR

12. Are you aware of any Regional or Interconnection Differences that should be included in this SAR?

Steve Beuning Xcel Energy 6	Yes Some RAs operate to different reliability criteria within their footprint due to existing NERC regions. The standards should accommodate the RA using applicable reliability criteria depending on the region involved.
As the SAR is developed, we will ask each Region to identify any specific Regional Differences that should be added to the scope of the SAR.	
Sam Jones ERCOT 2	Yes An explanation or clarification for Single Point Of Control Interconnections is needed. Add: For a Single Point Of Control Interconnection these requirements will be performed by the Single RA for the reliability of the Interconnection, but will only be coordinated with another RA for matters of schedules across a DC tie connecting two Interconnections when necessary.
The SAR has been revised to eliminate the references to Interconnections. Please review the revised SAR and see if the Interconnection Difference cited is still needed.	
Raj Rana AEP 1,3,5, 6	Yes Timelines for doing analysis – should be consistent with time lines of market operations.
As the SAR is developed, we will ask each Region to identify any specific Regional Differences that should be added to the scope of the SAR.	
Establishing specific timelines for doing analyses is beyond the scope of what will be addressed by the SAR Drafting Team.	
Linda Campbell FRCC Op & Eng Committee Paul Elwing Lakeland Elec 3 Marty Mennes FPL 1 Mark Bennett Gainesville 3 Roger Westphal Gainesville 3 Ben Sharma Kissimmee 3 Richard Gilbert Lakeland 3	Yes The FRCC requires the RA to follow out Security Process (Reliability Plan) which has additional requirements beyond this SAR.
As the SAR is developed more fully, please identify which requirement will need to be adjusted to address this Regional Difference.	
Jim Byrd Oncor 1	Yes In some cases, the SAR makes a point of saying "within an Interconnection". This is important in the case of ERCOT which has a single RA for the Interconnection. Where ties to an adjacent RA are through a HVDC Tie, coordination standards may not apply exactly as they do to synchronously connected RAs. This will be driven by specific standards as to whether or not they apply across a DC Tie. In some cases they may while in other cases they may not.
The SAR has been revised to eliminate the references to Interconnections. Please review the revised SAR and see if the Interconnection Difference cited is still needed.	
Darrell Richardson Illinois Power	Yes

Consideration of Comments on Second Posting of Coordinate Operations SAR

1, 3	It appears that study methodology differs from region to region.
As the SAR is developed more fully, please identify which requirement will need to be adjusted to address this Regional Difference.	
Jim Griffith Southern Co 1	No This needs to be defined further in the SAR process and should not be excluded as a question in future process for this SAR.
Agreed.	
Lee Xanthakos SCE&G 1	No Although regional difference may not exist, state and jurisdictional differences will.
Please identify these differences as the SAR and standard are developed so that these differences can be addressed in the standard.	
William Smith Allegheny 1	No
Thomas Washburn OUC 3	No
Thomas Vandervort Trans Subcommittee	No
Terry Bilke Midwest ISO 2	No
Ross Owen Oncor 1	No
Roger Green Southern Co Svcs SOCO Gen 5	No
Ron Gunderson NBPD 1	No
Robert Waldele NYISO 2	No
Richard Schwarz PNSC 2	No
Allan Silk MAPP Operating Subcommittee	No
Peter Burke ATC 1	No
Mitchell Needham TVA Stuart Goza TVA 1 Gary Jackson TVA 6	No
Ken Githens Allegheny Energy Supply 5	No
Kathleen Goodman ISO New England 2	No
John Stickley AECI 1	No
John Blazekovich Exelon 1,3,5,6	No
Guy Zito NPCC 2 Dan Stosick ISO NE 2 Roger Champagne HydroQuebec 1 Barry Gee Ngrid USA 1 David Kiguel HydroOne 1 Ralph Rufrano NYPA 1 Chuck Rusowicz Con Ed 1 Greg Campoli NYISO 2	No
George Bartlett Entergy 1	No

Consideration of Comments on Second Posting of Coordinate Operations SAR

13. Is the revised SAR missing any requirements that should be added?

Raj Rana AEP 1,3,5, 6	<p>Yes</p> <p>Both these SAR and the Certification of the Reliability Authority Function SAR are lacking in detail regarding providing a more consistent direction and interpretation of what security analyses and next-day assessments should entail. This was flagged as an area needing further clarification from the 2002 Reliability Coordinator Audits.</p> <p>Add:</p> <p>1) Coordinate confidentiality between RA and "other parties". 2) Transmission switching which impacts the other RA. 3)The SAR needs to include a section on a dispute resolution process for the RA's.</p>
<p>Reliability analyses are addressed in the Monitor and Assess Short term Transmission Reliability, Operate Within Transmission Limits standard. This SAR addresses the communication of the results of these analyses. We encourage you to comment on the Monitor and Assess Short term Transmission Reliability, Operate Within Transmission Limits standard.</p> <p>The SAR has been revised to address the issue of protecting confidentiality when sharing results of analyses.</p> <p>Transmission switching associated with outages would be addressed in the coordination of transmission outages. The SAR has been revised to address all actions on one RA's system that may impact another RA's system, and this would include transmission switching.</p> <p>The SAR has been revised to indicate that the standard needs to address what will happen when RAs cannot agree on a solution to an impending or actual operating problem.</p>	
Terry Bilke Midwest ISO 2	<p>Yes</p> <p>See comments to earlier questions</p>
Ron Gunderson NBPD 1	<p>Yes</p> <p>See comments above.</p>
Roger Green Southern Co Svcs SOCO Gen 5	No
Allan Silk MAPP Operating Subcommittee	No
William Smith Allegheny 1	No
Thomas Washburn OUC 3	No
Thomas Vandervort Trans Subcommittee	No
Sam Jones ERCOT 2	No
Ross Owen Oncor 1	No
Roman Carter Southern Co Gen & Energy Mktg 3,5,6 Joel Dison SCGEM 3,5,6 Tony Reed SCGEM 3,5,6 Lucius Burris SCGEM 3,5,6 Clifford Shephard SCGEM 3,5,6	No
Robert Waldele NYISO 2	No
Peter Burke ATC 1	No
Mitchell Needham TVA Stuart Goza TVA 1	No

Consideration of Comments on Second Posting of Coordinate Operations SAR

Gary Jackson TVA 6	
Ken Githens Allegheny Energy Supply 5	No
Kathleen Goodman ISO New England 2	No
John Stickley AECI 1	No
John Blazekovich Exelon 1,3,5,6	No
Jim Griffith Southern Co 1	No
Jim Byrd Oncor 1	No
George Bartlett Entergy 1	No
Darrell Richardson Illinois Power 1, 3	No
Lee Xanthakos SCE&G 1	No
Guy Zito NPCC 2 Dan Stosick ISO NE 2 Roger Champagne HydroQuebec 1 Barry Gee Ngrid USA 1 David Kiguel HydroOne 1 Ralph Rufrano NYPA 1 Chuck Rusowicz Con Ed 1 Greg Campoli NYISO 2	No

Consideration of Comments on Second Posting of Coordinate Operations SAR

14. If there are any requirements that you feel can not be measured, please identify them here.

Steve Beuning Xcel Energy 6	Saying that it is standard to "do an analysis" is not very useful. The standards drafting team should focus on what is the desired result and the standards compliance should measure how well the RA is doing on meeting the desired result.
To ensure that the system is operated reliably, there are some underlying requirements that an analysis be performed and that the results of the analysis be shared amongst the involved parties so that pre-emptive actions can be taken to prevent adversely impacting the interconnected system.	
Jim Griffith Southern Co 1	The assumptions made on page one by the SAR DT should be validated.
<p>Following are the assumptions and their current status. These may need to be updated in the future.</p> <ol style="list-style-type: none"> 1. The RA will sign a code of conduct and NERC Data Confidentiality Agreement as part of the RA Certification process <ul style="list-style-type: none"> – The latest version of the SAR for Certification of the RA function does include a requirement that the RA sign a code of conduct and a NERC Confidentiality Agreement. (Criteria 4.1 and 4.2) 2. Data needed by the RA is addressed through other SARs <ul style="list-style-type: none"> – The data to be collected for equipment ratings is addressed in the RA Certification SAR (Criteria 5.4) – The data needed for maintenance of models and for real time analysis is addressed in the Monitor and Assess Short-term Transmission Reliability – Operate Within Transmission Limits standard – requirements 203, 205, 206, 207, 208, 209 – The reliability-related data used in coordinating interchange is addressed in the Coordinate Interchange SAR – A request was sent to the Certification SAR DT, asking that a new criteria be added to the RA Certification SAR that addresses the provision of the initial set of data needed to develop system models and programs. 3. Data from the RA’s analyses is disseminated by the RA to its lower level functions and is addressed through other SARs <ul style="list-style-type: none"> – The draft standard, Monitor and Assess Short-term Transmission Reliability – Operate Within Transmission Limits includes a requirement that the RA take actions based on the results of reliability analyses. (Requirement 212) While this requirement does not specifically state that the RA shall disseminate results of its analyses to its lower level functions, this is implied in Requirement 212. 4. Coordination required for Interchange is addressed through other SARs <ul style="list-style-type: none"> – The Coordinate Interchange SAR addresses the reliability-related aspects of coordinating interchange. Coordination of market aspects of interchange will be addressed through NAESB’s standards development process. 	
George Bartlett Entergy 1	We believe none of these Requirements as specified can be measured. They all are subjective at this time. Significantly more detail is needed to make any of these "measurable". For instance, what is the "MEASURE" for "Share Results of Analyses"? Who decides what is meant by "when conditions warrant"? How is that measured?
More details will be added as the standard is developed by the Standards Drafting Team.	