Background

The Coordinate Operations Standard was posted for an initial public comment period from January 16 through March 1, 2004. The SDT asked industry participants to provide feedback to the standard through a special Standard Comment Form. There were 33 sets of comments, including comments from more than 117 different people. The comments can be viewed in their original format at:

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/COORD_OPERATIONS_STANDARD_01_Comments.pdf

The SDT made changes to the definitions and the standard based on the comments submitted by industry participants. The SDT's consideration of comments is provided in yellow highlighted text immediately under each question.

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, Gerry Cauley at 609-452-8060 or at gerry.cauley@nerc.net.

The most significant changes to this standard include:

Requirement 101 – Procedures, Processes or Plans

- Changed the requirement so it is clear that you need to obtain 'agreement' rather than 'approval' from any RA that is expected to take action as part of a Procedure, Process or Plan that involves RA to RA coordination.
- Removed 'system restoration' from the list of topics that must be addressed by Procedures, Processes or Plans, since there will be another standard that addresses this topic.
- Added 'the authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas' to the list of topics that must be addressed by Procedures, Processes or Plans
- Removed the requirement for a Document Change Control Procedure – but added a requirement that Procedures, Processes and Plans have either a version control number or date and a distribution list.

Requirement 103 – Coordination

- Modified the requirement to align with the newly approved Operating Policies – In the revised requirement, if RAs can't agree on whether there is a problem, the RAs must operate as though the problem exists. If RAs can't agree on the solution to a problem, they must operate to the most conservative solution identified.
- Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event
- Removed the requirement to compile a list of events that involved RA to RA coordination

Requirements 101, 102, 103 - Modified Compliance Monitoring and Levels of Non-compliance to make them simpler.

List of Questions:

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22. If you think there should be a requirement that each RA participate in a daily conference call with its adjacent RAs, what position should participate in the call – should the call be limited to system operators, or should each RA determine what position should participate in the daily call. 94

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24. Do you agree with the requirement to Coordinate Operations? 100

25. Do you agree with the measures? 103

26. Do you agree with the compliance monitoring process? 106

27. Do you agree with the levels of non-compliance? 110

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1. Do you agree with the SDT that the procedures addressed in this standard should be limited to procedures that aren't addressed in either the RA Certification SAR or the Operate within IORLs Standard?

Summary consideration:
Although a majority of the commenters indicated support for limiting this standard to addressing procedures not covered in RA Certification or the IROL Standard, there is no industry consensus on this issue. From the comments submitted, most commenters agreed that an entity should not be subjected to double jeopardy by including the same requirement in more than one standard.

Duplication with RA Certification: Several commenters indicated a concern that the RA Certification requirements will only be reviewed during the certification process and there may be a need to review some of these procedures on an ongoing basis. These comments indicated that the SDT should include language in the Coordinate Operations Standard that allows the Compliance Monitor to review RA to RA coordination procedures that may be required as part of the RA Certification Process.

Duplication with the IROL Standard:
The Monitor and Assess Short-term Transmission Reliability, Operate within Interconnection Reliability Operating Limits standard's Requirement 207, Processes, Procedures or Plans, does include the following:

> (1) The Reliability Authority shall have one or more processes, procedures, or plans that identify actions it shall take or actions it shall direct others to take, for both prevention and mitigation of instances of exceeding its Interconnection Reliability Operating Limits.

To eliminate any chance of duplication, the CO SDT asked the IROL SDT to add a footnote to Requirement 207, to indicate that the processes, procedures and plans in Requirement 207, are limited to those for actions within the RA's Reliability Area and to add a note indicating that any processes, procedures or plans that involved RA to RA coordination are addressed in the Coordinate Operations Standard.

Several commenters indicated a concern about the coordination between drafting teams and asked for some assurance that no requirements will be 'lost' as drafting teams work in parallel. Addressing this concern is outside the scope of the CO SDT and has been forwarded to the Director-Standards.

Commenter	Yes	No	Comments
Ed Riley; CA ISO		x	Please refer to Question 29, comment 1. 1. This draft of the Coordinate Operations Standard has been written dependent on certain requirements being covered in the RA Certification Standard and the Operate Within IROL Standard. The first draft of the RA Certification Standard has not yet been posted for review and the Operate Within IROL Standard failed on its first ballot attempt and is being re-written. With the uncertain final states of these two standards the CAISO is uncomfortable relying on requirements in the

			Coordinate Operations SAR not being included in the Coordinate Operations Standard. Could NERC please explain how the development of Reliability Standards is being coordinated? 2. The CAISO does support the concept that a requirement should not be duplicated in more than one standard subjecting an entity to potential double compliance fine. 3. The CAISO also believes that the final success of the Reliability Standards will be dependent on the development of the Reliability Standards database that will allow, for example, a RA to easily identify all Reliability Standard pertinent to RAs. What are the plans and schedule for the development of this database?
1. The standards process staff is making a good faith effort to keep track of the requirements in each of the standards, and is trying to keep the various drafting teams apprised of the interdependencies in the elements of different standards. Ultimately, it is the industry that determines what will/will not be included in any one of the standards. If a requirement needs to be added to a standard, it can be done at a later time with another SAR. Several commenters have expressed the same concern and this has been forwarded to the Director-Standards. The standards development staff is working on a table that cross-references elements that one drafting team is assuming will be addressed in another SAR or Standard so they do not become 'lost'. 2. Several commenters shared your concern that a requirement not be duplicated in multiple standards. To add more clarity to this standard and to ensure that there aren't any duplicate requirements between this standard and the RA Certification Standard and the Operate Within IROLs Standard, the SDT made the following change: The CO SDT asked the IROL SDT to add a footnote to Requirement 207, Operating Procedures, Processes, and Plans, to indicate that the processes, procedures and plans in Requirement 207, are limited to those for actions within the RA's Reliability Area. 3. The development of the relational database to support the new reliability standards is outside the scope of the CO SDT. We forwarded your concern to the Director-Standards.			
Operating Reliability Working Group – Southwest Power Pool (9)		x	The SDT should recall that the RA Certification SAR simply sets minimum standards for what is required to become an RA and relies on other standards for performance requirements. This comment applies to most of the remaining questions in the Background section.
While the RA Certification does set the minimum standards for what is required to become an RA, the SDT looked at having procedures as 'readiness' items, not real-time performance tasks. As proposed, the Coordinate Operations standard is not limited by the RA Certification standard. The CO SDT is including Requirements in the Coordinate Operations Standard that allows the Compliance Monitor to review any coordination procedures already required as part of the RA Certification Process.			

George Bartlett; Entergy		x	We disagree with the SDT. This is the standard for coordination of operations between RAs and this standard should contain the specification of all the requirements for an entity to "perform" that function. The Certification Standard should contain the requirements for an entity being "certified" as a RA. These are two very different activities. However double jeopardy should be avoided. If there is non-compliance the RA should not be penalized twice or more times if the same requirement is included in other standards.
To eliminate any chance of duplication, the CO SDT asked the IROL SDT to add a footnote to Requirement 207 to indicate that the processes, procedures and plans in Requirement 207 are limited to those for actions within the RA's Reliability Area.			
James Spearman / Florence Belser; PSC of SC (7)		x	The PSCSC is comfortable with limiting requirements to those not documented in an approved Standard which has undergone industry review. The PSCSC is concerned, however, about relying on criteria outlined in a SAR without knowing if the SAR requirements will ultimately be captured in the associated Standard.
To eliminate any chance of duplication, the CO SDT asked the IROL SDT to add a footnote to Requirement 207 to indicate that the processes, procedures and plans in Requirement 207 are limited to those for actions within the RA's Reliability Area. As proposed, the Coordinate Operations standard is not limited by the RA Certification standard. The CO SDT is including Requirements in the Coordinate Operations Standard that allows the Compliance Monitor to review any coordination procedures already required as part of the RA Certification Process.			
Gerald Rheault; Manitoba Hydro		x	This Standard should address all procedures listed in the approved versions of the SAR. If there is overlap between this Standard and others, this one should address **all coordination issues** and the other Standard be modified to address only other issues.
The Coordinate Operations SAR did not include a list of procedures – it included the following as a general description of the types of procedures to address in the standard: – Operating procedures that address identified potential operating scenarios that may impact neighbor RA's or the Interconnection shall be developed, and distributed to all entities that are expected to take action or that may be impacted as a result of this procedure. As proposed, the Coordinate Operations standard is not limited by the RA Certification standard. The CO SDT is including Requirements in the Coordinate Operations Standard that allows the Compliance Monitor to review any coordination procedures already required as part of the RA Certification Process. Because these new standards are being developed in parallel, each drafting team is acting to draft a standard that is being shaped by industry comments. The drafting teams don't have 'power of veto' over the comments submitted by the industry.			

Alan Boesch; NPPD		x	The RA Certification standard is a one-time process to gain certification. To the extent that the requirements in the certification standard are related to coordination issues they should be required and measured in this standard. This standard should be measuring the implementation of the procedures when required.
Only a small subset of the procedures addressed in the RA Certification standard are related to RA to RA coordination. As proposed, the Coordinate Operations standard is not limited by the RA Certification standard. The CO SDT is including Requirements in the Coordinate Operations Standard that allows the Compliance Monitor to review any coordination procedures already required as part of the RA Certification Process.			
P. D. Henderson / Khaqan Khan; The IMO		x	There should be an assessment that the requirements are outlined in the appropriate document, however, the duplications should be minimized.
The CO SDT agrees that duplication of Requirements should be avoided.			
Guy Zito; NPCC-CP9 (10) Kathleen Goodman; ISO NE Roger Champagne; Hydro Quebec A. Ralph Rufrano; NYPA		x	We feel that all the requirements of the Coordinate Operations Function should be included in this standard and the RA Certification Standard when written should require that the RA has the capability to be responsible for those RA listed requirements.
The CO SDT is including Requirements to the Coordinate Operations Standard that allows the Compliance Monitor to review any coordination procedures already required as part of the RA Certification Process.			
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10) Joseph C. Fleury; NYSRC Robert W Waldele; NYISO		x	The ISO/RTOs agree that duplication should be avoided. This standard, by its nature, should define the requirements, while the RA Certification Standard should require that this standard be applied.
The new certification standards are a bit different from the existing Control Area Certification. The new certification standards are limited to measuring whether an entity has the capability to perform the tasks assigned to that function under the Functional Model. The new certification standards assess 'readiness' but don't assess real-time compliance. The CO SDT is avoiding duplicate requirements in the CO standard.			
William F. Pope; Gulf Power Company		x	
William J. Smith; Allegheny Power	x		The location of procedures that address the requirements listed in the SAR but are not included in this Standard should be referenced in this Standard.

There are no procedures addressed in the SAR that are not included in this Standard. The SAR included the following reference to procedures: – Operating procedures that address identified potential operating scenarios that may impact neighbor RA's or the Interconnection shall be developed, and distributed to all entities that are expected to take action or that may be impacted as a result of this procedure.			
Marc Butts; Southern Co Svcs (10) Roman Carter, Southern Co Gen	x		We agree that the detailed requirements portion of many RC tasks properly belongs in other standards. However, the **Coordination** requirements properly belong in this standard. The detailed requirement should refer to the Coordinate Operations Standard for RC Coordination requirements. The Coordination requirements of this Standard should "stand alone" and not rely on other standards.
The "Monitor and Assess Short-term Transmission Reliability, Operate within Interconnection Reliability Operating Limits" Standard's Requirement 207 does include the following*:* (1) The Reliability Authority shall have one or more processes, procedures, or plans that identify actions it shall take or actions it shall direct others to take, for both prevention and mitigation of instances of exceeding its Interconnection Reliability Operating Limits. To eliminate any chance of duplication, the CO SDT asked the IROL SDT to add a footnote to Requirement 207 to indicate that the processes, procedures and plans in Requirement 207 are limited to those for actions within the RA's Reliability Area. The Monitor and Assess Short-term Transmission Reliability, Operate within Interconnection Reliability Operating Limits is the only standard that currently has what could be interpreted as a real-time RA to RA coordination requirement. With the suggested change, there should be no duplication of requirements.			
Richard J. Kafka; Pepco	x		If identical procedures are included in multiple Standards, it will simply lead to increasing coordination requirements**.**
Agreed. The standards development staff is working to try and prevent this from happening.			
John Horakh; MAAC	x		But my concern is that somehow we have to be sure that those procedures remain in those final approved Standards, and are not "lost".
Several commenters have expressed the same concern and the SDT has forwarded this concern to the Director-Standards. The standards development staff is working on a table that cross-references these elements so they do not become 'lost'.			
Peter Burke; ATC	x		
Karl Kohlrus; City Water Light & Power	x		

Stuart Goza; TVA (2)	X		
Susan Morris; SERC	X		
Tom Pruitt; Duke Power (3)	X		
Albert DiCaprio; PJM (4)	X		
Blaine Keener; PSC of MD	X		
Don Chandler; CenterPoint Energy (2)	X		
Don Gold; BPA (6)	X		
Don Reichenbach; SERC Ops Plng Sub (8)	X		
Patti Metro; FRCC (7)	X		
Rick Stegehuis; Wisconsin Electric	X		
Transmission Subcommittee (17)	x		

2. Do you agree with the SDT that documenting the RA's authority to assist in resolving problems that it caused to another system is addressed in the RA Certification Criteria?

Summary Consideration:
There was no consensus on whether the RA Certification Criteria would adequately cover the requirement addressing the RA's authority to assist in resolving problems that it caused to another system. Some industry commenters are concerned about having the same requirement in more than one standard.

To try and achieve what was intended, the SDT added specific language to Requirement 101 to require that the RA have a Procedure, Process or Plan that addresses the RA's authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

Commenter	Yes	No	Comments
Operating Reliability Working Group – Southwest Power Pool (9)		x	Until the RA Certification Criteria are approved there is no certainty that those requirements will be in the standard.
Because the standards are being developed in parallel, there will not be any guarantee about the final outcome of any standard until that standard is approved by its Ballot Pool. The RA Certification SAR was approved for development as a standard – and the Certification Standard Drafting Team has been working on the development of the RA Standard and it should be posted for industry review in a couple months. If we moved forward and didn't make a good faith effort to eliminate duplication, we could end up with the same requirement in multiple standards. The standards development staff is making a good faith effort to track the requirements in all of the SARs and Standards to ensure that none are erroneously omitted and to ensure that none are duplicated. Several commenters have expressed the same concern and the SDT has forwarded this concern to the Director-Standards.			
James Spearman / Florence Belser; PSC of SC		x	The PSCSC is comfortable with limiting requirements to those not documented in an approved Standard which has undergone industry review. The PSCSC is concerned, however, about relying on criteria outlined in a SAR without knowing if the SAR requirements will ultimately be captured in the associated Standard.

Because the standards are being developed in parallel, there will not be any guarantee about the final outcome of any standard until that standard is approved by its Ballot Pool. The RA Certification SAR was approved for development as a standard – and the Certification Standard Drafting Team has been working on the development of the RA Standard and it should be posted for industry review in a couple months. If we moved forward and didn't make a good faith effort to eliminate duplication, we could end up with the same requirement in multiple standards. The standards development staff is making a good faith effort to track the requirements in all of the SARs and Standards to ensure that none are erroneously omitted and to ensure that none are duplicated. Several commenters have expressed the same concern and the SDT has forwarded this concern to the Director-Standards.			
Don Gold; BPA (6)		x	The RA Standard is still under development. Therefore it is unknown what it will contain at this time. The RA Certification SAR does not require this authority.
Because the standards are being developed in parallel, there will not be any guarantee about the final outcome of any standard until that standard is approved by its Ballot Pool. The RA Certification SAR was approved for development as a standard – and the Certification Standard Drafting Team has been working on the development of the RA Standard and it should be posted for industry review in a couple months. If we moved forward and didn't make a good faith effort to eliminate duplication, we could end up with the same requirement in multiple standards. The standards development staff is making a good faith effort to track the requirements in all of the SARs and Standards to ensure that none are erroneously omitted and to ensure that none are duplicated. Several commenters have expressed the same concern and the SDT has forwarded this concern to the Director-Standards.			
Don Reichenbach; SERC Ops Plng Sub (8)		x	Although the RA Certification SAR mentions that an RAs authority must be documented, the specific requirement for one RA to have authority to assist in resolving problems outside of his/her reliability area does not currently exist. This would seem to be a specific requirement of the agreement required in the RA Certification SAR.
This is what the SDT had envisioned. However, several commenters wanted this obligation to also be addressed in this standard, so the SDT added language to Requirement 101 to indicate that the RA is required to have a Procedure, Process or Plan that addresses the RA's authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.			

Gerald Rheault; Manitoba Hydro		x	The Certification Standards have not yet been posted for initial review by the industry. It is therefore pure speculation by the SDT that the issue referenced above is properly addressed by that Standard and expect the industry to be able to make a appraisal on the information presently available. Also the comment contained in comment 1 above also applies here.
Because the standards are being developed in parallel, there will not be any guarantee about the final outcome of any standard until that standard is approved by its Ballot Pool. The RA Certification SAR was approved for development as a standard – and the Certification Standard Drafting Team has been working on the development of the RA Standard and it should be posted for industry review in a couple months. If we moved forward and didn't make a good faith effort to eliminate duplication, we could end up with the same requirement in multiple standards. The standards development staff is making a good faith effort to track the requirements in all of the SARs and Standards to ensure that none are erroneously omitted and to ensure that none are duplicated. Several commenters have expressed the same concern and the SDT has forwarded this concern to the Director-Standards.			
Joseph C. Fleury; NYSRC Robert W Waldele; NYISO		x	The entity causing the problem(s) should have the primary responsibility for resolving the problem(s) that it caused.
Agreed. Requirement 101 has been changed to include a requirement that the RA have a Procedure, Process or Plan that addresses the RA's authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.			
Marc Butts; Southern Co Svcs (10) Roman Carter, Southern Co Gen		x	The actual **Coordination requirements** between RCs should be included in this standard. Also, the specific requirement for one RA to have authority to assist in resolving problems **outside** of its reliability area does not currently exist.
We assume you meant RAs and not RCs. Requirement 101 has been changed to include a requirement that the RA have a Procedure, Process or Plan that addresses the RA's authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.			
Patti Metro; FRCC (7)		x	The RA Certification Criteria a is a one-time certification with no compliance monitoring included to make sure that conscious authority is maintained on an ongoing basis.
Requirement 101 has been changed to include a requirement that the RA have a Procedure, Process or Plan that addresses the RA's authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.			

Susan Morris; SERC		X	Although the RA Certification SAR mentions that an RAs authority must be documented, the specific requirement for one RA to have authority to assist in resolving problems outside of its reliability area does not currently exist.
Requirement 101 has been changed to include a requirement that the RA have a Procedure, Process or Plan that addresses the RA's authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.			
John Horakh; MAAC	1		Question should refer to RA Certification SAR, not Criteria
The RA Certification SAR includes a list of RA Certification Criteria – and having an agreement that defines the responsibility and authority of the RA with respect to its adjacent RAs is included in that list of criteria. However, there were enough commenters who wanted something specific added to this standard, that the SDT has added an element to Requirement 101 to indicate that the RA must have a Procedure, Process or Plan that addresses the RA's authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.			
Albert DiCaprio; PJM (4)	x		An entity's authority must be assigned **prior to** it being certified as an RA. The relationships between RAs and other functional entities are defined in the Functional Model.
The SDT agreed with you, but there is no industry consensus on this matter. Some people read the SAR's use of the term, 'authority' and interpreted this to by synonymous with 'responsibility.' The SDT added specific language to Requirement 101 to require that the RA have a Procedure, Process or Plan that addresses the RA's authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.			
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)	x		The Authority issue is best covered in RA Certification rather than the standard that defines the 'what' of coordinating ops. It is logical to require documenting authority, by whatever means, as part of certification
The SDT agreed with you, but there is no industry consensus on this matter. Some people read the SAR's use of the term, 'authority' and interpreted this to by synonymous with 'responsibility.' The SDT added specific language to Requirement 101 to require that the RA have a Procedure, Process or Plan that addresses the RA's authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.			
Ed Riley; CA ISO	x		Please refer to Question 29, comment 1.
Please see response at Question 29, comment 1.			
Peter Burke; ATC	X		

Richard J. Kafka; Pepco	X		
A. Ralph Rufrano; NYPA	X		
Transmission Subcommittee	x		
George Bartlett; Entergy	X		
Karl Kohlrus; City Water Light & Power	X		
William F. Pope; Gulf Power Company	X		
William J. Smith; Allegheny Power	X		
Alan Boesch; NPPD	X		
Blaine Keener; PSC of MD	X		
Don Chandler; CenterPoint Energy (2)	X		
Guy Zito; NPCC-CP9 (10)	X		
Kathleen Goodman; ISO NE	x		
P. D. Henderson / Khaqan Khan; The IMO	X		
Rick Stegehuis; Wisconsin Electric	X		
Roger Champagne; Hydro Quebec	X		
Stuart Goza; TVA (2)	x		

3. Do you think this Coordinate Operations Standard should have a requirement that the RA conduct Operational Planning Analyses and Real Time Assessments to identify normal and emergency system conditions involving its RA Area that may affect interconnection reliability?

Summary Consideration: Most commenters, but not necessarily a consensus, indicated that the requirement to conduct Operational Planning Analyses and Real Time Assessments should not be included in this standard. Again, several commenters are concerned that relying on other standards that are still under development, may result in losing some critical requirements.

Commenters	Yes	No	Comments
Don Reichenbach; SERC Ops Plng Sub (8)			It is unfortunate that this SAR/Standard is limited to RAs. This limits the time frame of the coordination efforts being measured by this standard to real-time and day-ahead. There are numerous operational coordination activities that occur outside of this timeframe and with entities other than just the RAs.
The SAR DT that developed the SAR for this standard recognized a possible need for another standard that addresses coordination of actions within an RA's footprint. There are no restrictions on the time frame of the coordination efforts addressed in this standard. Some of the requirements, such as developing procedures that address the coordination of actions between two RAs, are expected to be accomplished many months or a year ahead of 'real-time'. If you feel there are RA to RA coordination activities that should take place and aren't addressed in this standard, please send the SDT a list.			
Gerald Rheault; Manitoba Hydro			The Operate Within IROLs Standard defines the requirement to conduct Operational Planning Analyses and Real Time Assessment. The Coordinate Operations Standard should address the requirements for how all RAs involved in any joint interface will coordinated their activities to ensure that coordinates monitoring and actions are in place to protect the interface and the RAs physical systems.
Agreed. This is what the SDT attempted to do by requiring procedures, plans and process.			
Albert DiCaprio; PJM (4)			1. Standards are written to functional entities RA/BAs/ et al; they are not written for "Operating Personnel". Therefore this question is not clear in reference to NERC Standards. 2. In any case, the two conditions in Item #3 are different sides of the same issue. The Ratings standard and the Operate within Limits standards respectively require that all conditions be evaluated and all limits be operated to. The Ratings Standard mandates

			RAs to compute SOLs by looking at current (normal?) and alternative (contingency and emergency?) conditions. The Operate within limits standard mandates the RAs respect those SOLs that are IROLs. Therefore if the SDT is asking if all situations are covered then the answer is YES they are covered in other Standards. If on the other hand the SDT is asking whether or not NERC must mandate RAs to follow its own internal limits, then the SDT has an obligation to be clearer in what it is asking. If the SDT is expanding the scope to include mandates that RAs follow their own local limits, then the SDT must post the alternatives to read: – NERC should limit this standard to RA-to-RA events and leave internal operations to its own regional requirements. (Y/N) – NERC should expand standard to include both external and internal RA affects (such as complying with all internal thermal limits all of the time). (Y/N) The two answers that SDT provided do not address the above two questions. Of course the RAs must assess local (i.e. internal) reliability. The question is "Does the industry need a NERC Standard to enforce that need?" If this NERC standard is to address "NOT how" entities act, but rather to address how entities interact, then the answer should be NO NERC standard is required to mandate how an RA operates its own area. If this requirement were expanded, then all RAs would be responsible for reporting violations of thermal limits on every line no matter how trivial the consequence. 3. The SDT should not go beyond its original scope and stay with RA-to-RA coordination.
1. The question did not include the term, 'operating personnel' however the selection of possible responses did. 2. The purpose of question 3 was to ask if this standard should include a requirement for RAs to conduct operational planning analyses and real-time assessments that look at elements not already considered in the IROL standard. 3. The SAR for this standard did include the following: The RA shall coordinate the development of its reliability analyses with other RAs. These analyses shall consider known generation and transmission outages. The RA shall share the results of its system analyses, when conditions[1] warrant, with other RA's, and other involved entities (or upon request, subject to the FERC Code of Conduct and other Confidentiality Agreements) The SDT did not include a requirement for reliability analyses in this standard because the SDT felt the requirement had been adequately addressed in the IROL Standard. The			

[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.

	purpose of this question was to highlight the difference between the SAR and its associated standard and obtain industry feedback on the appropriateness of the SDT's interpretation.		
Operating Reliability Working Group – Southwest Power Pool (9)	x		Assessments should go beyond the analyses of identified IROLs. The second statement requires a much broader scope of studies to be conducted.
Most commenters indicated that, from the system operator's perspective, the assessments would not be different. Please let the SDT know what additional studies you feel should be included here.			
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)	x		We recommend a clearer definition of the intent of the requirements between the two standards (IROL and CO). There is a risk for omission as well as duplication.
The IROL Standard was intended to ensure that each RA monitor and control its own RA Area – and the Coordinate Operations was intended to address coordination between two or more RA Areas.			
Roger Champagne; Hydro Quebec	x		Reliability is not just IROL concern. Coordinate Operations should include adequacy assessments too.
Requirement 101 is intended to include "adequacy assessments" in the "plan for the resolution of energy and capacity shortages" and should be coordinated with other Reliability Authorities if they are affected.			
Robert W Waldele; NYISO	x		The requirement(s) should be consistent across Standards applicable to reliable operation of the interconnected system. Independent development of the Certification, Coordinate (Operations, Interchange, etc.), IROL, and DFR various standards raises the concern that there will not be consistency among the standards leading to conflicting or duplicated requirements and/or confusion.
The standards development process supports having each drafting team make adjustments to each draft standard in a manner that brings the industry to consensus on the requirements within that standard. The standards development staff is making a good faith effort to track the requirements in all of the SARs and Standards to ensure that none are erroneously omitted and to ensure that none are duplicated. There have been several situations already where industry commenters have requested that changes be made to expand the scope of a standard beyond the scope of the associated SAR. In these cases, the chairman of the drafting team has informed the Director-Standards, and the Director-Standards has sent a letter to the NERC Operating Committee requesting that a technical committee be assigned to investigate the need for another SAR and to submit that SAR if appropriate. Anyone who feels that an additional SAR is needed to address a requirement that hasn't already been addressed, is free to develop that SAR and submit it to the Director-Standards for consideration by the SAC.			

Susan Morris; SERC	x		This is an example of where Regional differences exist. For some Regions, entities that perform Reliability Authority functions have two distinct "groups" of personnel to address real-time assessments and operational planning analysis. In other Regions, entities that perform Reliability Authority functions assign both real-time and operational planning assessments/analysis, respectively to the same personnel. Given that the NERC Reliability Functional Model Version 2 does not explicitly state that the Reliability Authority is responsible for performing operational planning analysis, it should be assumed because the Planning Authority generally covers one year and beyond. Therefore, it is suggested that the operational planning horizon be defined as all analysis for day 2 through 1 year. This would warrant the need for two distinct requirements: 1) Real-Time Assessments (current hour through day 2) and 2) Operational Planning Analysis (day 2 through 1 year). This would ensure that there is no gap between the responsibilities of the Reliability and Planning Authorities, in fact, the line between horizons should be subject to overlap if a reliability concern is evident. We agree that duplication should be avoided. This standard, should define the requirements, and the RA Certification Standard should require that this standard be applied.
The terms, "Operational Planning Analysis" and Real-time Assessment" have been defined within the Operate within IROLs Standard. The industry has commented on these terms, and seems to have agreed that the proposed definitions are appropriate. The terms and their proposed definitions are: **Operational Planning Analysis:** An analysis of the expected system conditions for the next day's operation and up to 12 months ahead. Expected system conditions include things such as load forecast(s), generation output levels, and known system constraints (transmission facility outages, generator outages, equipment limitations, etc.). **Real-time Assessment:** An examination of existing and expected system conditions, conducted by collecting and reviewing immediately available data.			
Don Chandler; CenterPoint Energy (2)	x		
Joseph C. Fleury; NYSRC		x	The requirement(s) should be consistent across all standards applicable to reliable operation of the interconnected system.
The standards development process supports having each drafting team make adjustments to each draft standard in a manner that brings the industry to consensus on the requirements within that standard. The standards development staff is making a good faith effort to track the requirements in all of the SARs and Standards to ensure that none are erroneously omitted and to ensure that none are duplicated. There have been several situations already where industry commenters have requested that changes be made to expand the scope of a standard beyond the scope of the associated SAR. In these cases, the chairman of the drafting team has informed the Director-Standards, and the Director-Standards has sent a letter to the NERC Operating Committee requesting that a technical committee be assigned to investigate the need for another SAR and to submit that SAR if appropriate.			

Anyone who feels that an additional SAR is needed to address a requirement that hasn't already been addressed, is free to develop that SAR and submit it to the Director-Standards for consideration by the SAC.			
Guy Zito; NPCC-CP9 (10) A. Ralph Rufrano; NYPA Kathleen Goodman; ISO NE		x	We are concerned that the Certification Standard, IROL Standard and the Coordinate Operations Standard are being developed independently and there may be a lack of coordination with what the RA does. We are concerned that there may be duplicative requirements or worse, missing requirement(s) between Standards and a potential for inconsistency. We don't believe that the IROL should be added to this standard.
The standards development process supports having each drafting team make adjustments to each draft standard in a manner that brings the industry to consensus on the requirements within that standard. The standards development staff is making a good faith effort to track the requirements in all of the SARs and Standards to ensure that none are erroneously omitted and to ensure that none are duplicated. There have been several situations already where industry commenters have requested that changes be made to expand the scope of a standard beyond the scope of the associated SAR. In these cases, the chairman of the drafting team has informed the Director-Standards, and the Director-Standards has sent a letter to the NERC Operating Committee requesting that a technical committee be assigned to investigate the need for another SAR and to submit that SAR if appropriate.			
Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen		x	The detailed requirements for analyses and assessments should be defined in the OWL standard, but the **Coordination requirements** should be included in this standard and referenced by the OWL standard.
The standards development process supports having each drafting team make adjustments to each draft standard in a manner that brings the industry to consensus on the requirements within that standard. There are many different ways of 'sorting' all the requirements in the proposed set of standards. Eventually, the NERC IT staff will enter the standards into a relational database so that anyone can 'search' the database and find the requirements that are applicable to a function, to a topic, etc. Until then, there may be some topics that are partially addressed in one standard and partially addressed in another standard. The standards process staff is making a good faith effort to ensure that no requirements are omitted and no requirements are duplicated in more than one standard.			
George Bartlett; Entergy		x	The requirement that RAs conduct Operational Planning Analyses is contained in two standards and should not be repeated here: Standard 600 — Determine Facility Ratings, System Operating Limits, and Transfer Capabilities, and Standard 200 – Operate Within Interconnected Reliability Operating Limits Standard. Real-Time Assessments should also be contained in the two Standards and should not be repeated here. Coordination of the standards and the requirements contained therein needs to be accomplished among the several Standard Development Teams.
The CO standard does not require 'conducting' studies but requires sharing the results of the studies. The standards process staff is making a good faith effort to ensure that no requirements are omitted and no requirements are duplicated in more			

than one standard.			
Ed Riley; CA ISO		x	Please refer to Question 29, comment 1.
Please see response to question 29, comment 1.			
James Spearman / Florence Belser; PSC of SC		x	
John Horakh; MAAC		x	
Peter Burke; ATC		x	
Karl Kohlrus; City Water Light & Power		x	
William F. Pope; Gulf Power Company		x	
William J. Smith; Allegheny Power		x	
Alan Boesch; NPPD		x	
Blaine Keener; PSC of MD		x	
Don Gold; BPA (6)		x	
Transmission Subcommittee(17)		x	
P. D. Henderson / Khaqan Khan; The IMO		1	
Patti Metro; FRCC (7)		x	
Rick Stegehuis; Wisconsin Electric		x	
Richard J. Kafka; Pepco		x	

Stuart Goza; TVA (2)		x	

4. Do you agree with the SDT that Analyzing Maintenance Outages is adequately addressed in the RA Certification SAR and the Operate Within IROLs Standard?

Summary Consideration: Most of the commenters indicated that this standard should not include the analysis of maintenance outages. Many commenters expressed concern that the RA Certification and IROL Standards have not been approved assuring that the requirements are included.

Commenters	Yes	No	Comments
Operating Reliability Working Group – Southwest Power Pool (9)		x	Until the RA Certification Criteria and the Operate Within IROLs Standard are approved there is no certainty that those requirements will be in the standard. Additionally, we have concerns that the approval of generation outages is not included in this standard as is the required approval of transmission outages.
Because the standards are being developed in parallel, there will not be any guarantee about the final outcome of any standard until that standard is approved by its Ballot Pool. The RA Certification SAR was approved for development as a standard – and the Certification Standard Drafting Team has been working on the development of the RA Standard and it should be posted for industry review in a couple months. If we moved forward and didn't make a good faith effort to eliminate duplication, we could end up with the same requirement in multiple standards. The standards development staff is making a good faith effort to track the requirements in all of the SARs and Standards to ensure that none are erroneously omitted and to ensure that none are duplicated. Several commenters have expressed the same concern and the SDT has forwarded this concern to the Director-Standards. This standard was developed using the Functional Model as a basis – and under the Functional Model, the RA doesn't have the authority to 'approve' generation outages. The following is an excerpt from the list of tasks assigned to the RA and can be found on page 11 of the Functional Model, version 2: Direct revisions to transmission maintenance plans as required and as permitted by agreements. Request revisions to generation maintenance plans as required and as permitted by agreements			
James Spearman / Florence Belser; PSC of SC		x	The PSCSC is comfortable with limiting requirements to those not documented in an approved Standard which has undergone industry review. The PSCSC is concerned, however, about relying on criteria outlined in a SAR without knowing if the SAR requirements will ultimately be captured in the associated Standard.

Because the standards are being developed in parallel, there will not be any guarantee about the final outcome of any standard until that standard is approved by its Ballot Pool. The RA Certification SAR was approved for development as a standard – and the Certification Standard Drafting Team has been working on the development of the RA Standard and it should be posted for industry review in a couple months. If we moved forward and didn't make a good faith effort to eliminate duplication, we could end up with the same requirement in multiple standards. The standards development staff is making a good faith effort to track the requirements in all of the SARs and Standards to ensure that none are erroneously omitted and to ensure that none are duplicated. Several commenters have expressed the same concern and the SDT has forwarded this concern to the Director-Standards.			
Alan Boesch; NPPD		x	The requirement to coordinate and approve outages in the Certification Standard is a check for having a procedure, process or tool to accomplish the task and is a one time measurement. This standard should address implementation of the procedure or process.
Agreed that the certification standard is a check to verify that an entity has certain procedures, processes, tools, capabilities. Requirement 101 in this standard requires that the RA have a procedure that indicates how it will notify other RAs of impactive situations involving the exchange of planned or unplanned outage information. Requirement 102 in this standard requires that the RA have evidence it has followed this procedure.			
Don Chandler; CenterPoint Energy (2)		x	Any maintenance outage plans should include coordination of all affected parties and not be exclusive to the Reliability Authorities. –RTS
Agreed – although this standard doesn't go beyond the requirement that this activity include notification of other RAs, this standard doesn't preclude notification of all impacted parties.			
Gerald Rheault; Manitoba Hydro		x	The same comment as was provided in question 2 applies here. (*The Certification Standards have not yet been posted for initial review by the industry. It is therefore pure speculation by the SDT that the issue referenced above is properly addressed by that Standard and expect the industry to be able to make a appraisal on the information presently available. Also the comment contained in comment 1 above also applies here.)*
Because the standards are being developed in parallel, there will not be any guarantee about the final outcome of any standard until that standard is approved by its Ballot Pool. The RA Certification SAR was approved for development as a standard – and the Certification Standard Drafting Team has been working on the development of the RA Standard and it should be posted for industry review in a couple months. If we moved forward and didn't make a good faith effort to eliminate duplication, we could end up with the same requirement in multiple			

standards. The standards development staff is making a good faith effort to track the requirements in all of the SARs and Standards to ensure that none are erroneously omitted and to ensure that none are duplicated. Several commenters have expressed the same concern and the SDT has forwarded this concern to the Director-Standards.			
Joseph C. Fleury; NYSRC Robert W Waldele; NYISO		 x	The phrase “exchange planned or unplanned outage information” is used repetitively throughout the document, but there are no similar prominent reference(s) to “analyze planned outages”?
Agreed. This is because the requirement to analyze planned outages, at least in the short term, is required in the IROL Standard and is beyond the scope of the Coordinate Operations Standard.			
Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen		 x	It is not a good plan to use certification requirements to set standards. If something is sufficiently important to require a standard, then it should be presented as such and not simply be defined in the certification requirements. And again, even if the detailed technical requirements are defined elsewhere, the **Coordination requirements** should be included in this standard and referenced by the other standard.
This is what the SDT tried to do. Requirement 101 in this standard requires that the RA have a procedure that indicates how it will notify other RAs of impactive situations involving the exchange of planned or unplanned outage information. Requirement 102 in this standard requires that the RA have evidence it has followed this procedure. Requirement 103 requires the RA to coordinate operations on system conditions that can affect other RAs.			
Susan Morris; SERC		 x	First of all, the RA Certification SAR is not a Standard, it is a requirements list. The only reason it was initiated through the SAR process was to take advantage of the formal due process. Therefore, the SDT should not omit requirements listed in the RA Certification requirements from actual draft Standards. It would seem that the RA Certification requirements could reflect requirements that exist in Reliability Standards, not the other way around. Second, the Maintenance Outage Plan should cover the entire real-time operations and operational planning horizons (current hour through 1 year). Of course, depending on the outage request timeframe, the type and frequency of analysis would differ.
The RA Certification will be a standard. This standard does not address the actual analysis or the timeframes only the coordination of the results of the analysis. The terms, “Operational Planning Analysis” and Real-time Assessment” have been defined within the Operate within IROLs Standard. The			

industry has commented on these terms, and seems to have agreed that the proposed definitions are appropriate. The terms and their proposed definitions are: **Operational Planning Analysis:** An analysis of the expected system conditions for the next day's operation and up to 12 months ahead. Expected system conditions include things such as load forecast(s), generation output levels, and known system constraints (transmission facility outages, generator outages, equipment limitations, etc.). **Real-time Assessment:** An examination of existing and expected system conditions, conducted by collecting and reviewing immediately available data.			
George Bartlett; Entergy	x		This is a requirement for the RA to perform and is specified in the Standard 600 — Determine Facility Ratings, System Operating Limits, and Transfer Capabilities and should be included here and not be repeated in other standards.
Requirements can not be duplicated in more than one standard. Standard 600 requires a methodology for Facility Ratings, System Operating Limits and Transfer Capabilities and requires that these be communicated to those that need them. Standard 600 could be viewed as a 'preliminary' standard because it requires an organized method of developing and delivering ratings and limits. Standard 200 addresses the real-time operation of the RA's Area doesn't exceed any critical limits. The Coord Ops SDT took steps to try to prevent duplication between Standard 200 and this standard.			
Don Reichenbach; SERC Ops Plng Sub (8)	x		The RA Certification SAR does not cover the actual coordination. It requires processes and tools be in place. The Operate within IROLs standard does address analyzing maintenance outages adequately given that the timeframe covered by Standard 100 is only real-time to day-ahead. It seems that there is a need for this SAR's timeframe to be expanded or another SAR developed to cover other timeframes for coordinating operations. We feel that the best solution would be to expand this SAR/Standard's timeframe so that the entire outage coordination process can be covered in one standard rather than split between two.
This standard doesn't have any time constraints. Requirement 101 in this standard requires that the RA have a procedure that indicates how it will notify other RAs of impactive situations involving the exchange of planned or unplanned outage information. Requirement 102 in this standard requires that the RA have evidence it has followed this procedure. The SDT interpreted this exchange of information to be 'coordination'.			
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)	x		The requirement should be defined solely in the IROL Standard, not split between certification and the IROL Standard.
This requirement is already partially covered in the approved RA Certification SAR and in the IROL Standard. The RA Certification requires a			

process or procedure, and the IROL Standard requires outages to be considered in analyses.			
Ed Riley; CA ISO	x		Please refer to Question 29, comment 1.
Please see response at Question 29, comment 1.			
Richard J. Kafka; Pepco	x		
A. Ralph Rufrano; NYPA	x		
Transmission Subcommittee (17)	x		
John Horakh; MAAC	x		
Karl Kohlrus; City Water Light & Power	x		
William J. Smith; Allegheny Power	x		
Albert DiCaprio; PJM (4)	x		
Blaine Keener; PSC of MD	x		
Peter Burke; ATC	x		
Guy Zito; NPCC-CP9 (10)	x		
Kathleen Goodman; ISO NE	x		
P. D. Henderson / Khaqan Khan; The IMO	x		
Patti Metro; FRCC (7)	x		
Rick Stegehuis; Wisconsin Electric	x		
Roger Champagne; Hydro Quebec	x		
Stuart Goza; TVA (2)	x		

5. Do you think that sharing outage data between RAs is properly placed in the draft standard, or do you think that sharing outage data should be a separate requirement within this standard?

Summary Consideration: The consensus of the commenters is that requiring a procedure on sharing of outage information (101) and the requirement to actually share the information (102) is adequate and that a separate requirement is not necessary.

Commenter	Keep	Move	Comments
Don Reichenbach; SERC Ops Plng Sub (8) Susan Morris; SERC			We had difficulty seeing where sharing outage data was required in section 103 – Coordinate. (Although date and time of information exchanges is required to be documented, information exchanges do not automatically imply sharing outages specifically.) It appears adequate to cover sharing outages only in section 102 since this section seems to cover the entire timeframe of this standard. However, if the requirement does exist in both places and we have misread section 103, the requirements need careful review to ensure that non-compliance double-jeopardy is avoided.
Requirement 101 in this standard requires that the RA have a procedure that indicates how it will notify other RAs of impactive situations involving the exchange of planned or unplanned outage information. Requirement 102 in this standard requires that the RA have evidence it has followed this procedure			
James Spearman / Florence Belser; PSC of SC		x	The PSCSC believes that outages can have such a profound impact on reliability, particularly if adjacent control areas have no knowledge of those outages, that this data deserves a separate section.
Most commenters felt that the requirement was appropriately placed in the draft standard.			
William F. Pope; Gulf Power Company		x	
Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen		x	
Alan Boesch; NPPD		x	
Blaine Keener; PSC of MD		x	
Don Chandler; CenterPoint Energy (2)		x	

Operating Reliability Working Group – Southwest Power Pool (9)	x		
Richard J. Kafka; Pepco	x		Note that reference given in this form (Notifications and Data Exchange) is really Notifications and Information Exchange
Agreed.			
Albert DiCaprio; PJM (4)	x		Standard 600 (Ratings) requires that outage data be provided to the RA, so that the RA can compute SOLs. Therefore the data sharing should and is "embedded in other Standards/requirements"
Agreed. This is also addressed in the IROL Standard where the RA is required to develop and distribute a Data Specification. It is expected that the RA's Data Specification will include outage data as this may be critical.			
Transmission Subcommittee	x		The subcommittee believes the location of the "Exchange of planned or unplanned outage information" is properly placed in this draft standard and does not recommend a separate requirement within this standard. Outage information does not merit greater or less focus or emphasis than other system status information captured within Standard 101.
Agreed.			
Joseph C. Fleury; NYSRC Robert W Waldele; NYISO	x		Outage information should not be considered any more (or less) important than the exchange of other system status information (capacity, load forecast, unusual conditions, etc.).
Agreed.			
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)	x		The relevant requirements should also specify what type of data should be shared to ensure consistency.
Requirement 101 in this standard requires that the RA have a procedure that indicates how it will notify other RAs of impactive situations involving the exchange of planned or unplanned outage information. Requirement 102 in this standard requires that the RA have evidence it has followed this procedure.			
P. D. Henderson / Khaqan Khan; IMO	x		As long as it is clear that the data to be shared includes outage data
Requirement 101 in this standard requires that the RA have a procedure that indicates how it will notify other RAs of impactive situations involving the exchange of planned or unplanned outage information. Requirement 102 in this standard requires that the RA have evidence it			

has followed this procedure			
Ed Riley; CA ISO	X		
Peter Burke; ATC	X		
George Bartlett; Entergy	X		
John Horakh; MAAC	X		
Karl Kohlrus; City Water Light & Power	X		
William J. Smith; Allegheny Power	X		
Tom Pruitt; Duke Power (3)	X		
A. Ralph Rufrano; NYPA	X		
Gerald Rheault; Manitoba Hydro	X		
Guy Zito; NPCC-CP9 (10)	X		
Kathleen Goodman; ISO NE	X		
Patti Metro; FRCC (7)	X		
Rick Stegehuis; Wisconsin Electric	X		
Roger Champagne; Hydro Quebec	X		
Stuart Goza; TVA (2)	X		

6. Do you agree with the SDT that this standard should be limited to RA to RA coordination and including a requirement that the RA share its Operating Procedures, Processes or Plans with entities other than RAs is beyond the intended scope of the SAR?

Summary Consideration: The industry commenters indicated general consensus with the CO SDT on this item. The industry is concerned about coordination of operations within the RA footprint and feels that an additional standard needs to be proposed for this. The SAR DT that developed this standard indicated a potential need for another standard to address coordination within the RA's footprint, and asked the NERC OC to address this potential need.

Commenters	Yes	No	Comments
Don Reichenbach; SERC Ops Plng Sub (8)			As noted above, it seems that there is a need for this SAR's timeframe to be expanded or another SAR developed to cover other timeframes for coordinating operations. There are definitely operations coordination activities that are not getting covered. The coordination among the various functions is vitally important to the reliability of the system.
This standard doesn't have any time constraints. Please identify the coordination activities that involve multiple RAs that are not addressed by this standard. The SAR DT that developed the SAR that led to this standard requested that the NERC OC review the need for a standard that addresses the RA's coordination of activities within its RA Area.			
Joseph C. Fleury; NYSRC Robert W Waldele; NYISO		x	There is a need for coordination and cooperation among **all entities** involved directly in system operation.
Agreed. The SAR DT that developed the SAR that led to this standard requested that the NERC OC review the need for a standard that addresses the RA's coordination of activities within its RA Area – the requirement that RAs share their documents with entities within their own footprint would go with this new SAR.			
Don Chandler; CenterPoint Energy (2)		x	My concern is, if it is not covered here, then it will not be covered. There appears to be a prevailing opinion that Reliability Authorities will operate the system independently of others. We believe that operations of the system should involve all concerned parties for reliability. In some areas, the Reliability Authority does no real operations and is only the administrator or oversight. Without a plan encompassing the operational interfaces, it is doomed for great obstacles. –RTS

The consensus of the commenters was that this standard should be limited to RA to RA coordination. The SAR DT that developed the SAR that led to this standard requested that the NERC OC review the need for a standard that addresses the RA's coordination of activities within its RA Area – the requirement that RAs share their documents with entities within their own footprint would go with this new SAR. The SDT does not support the position that RAs work independent of other entities.			
Alan Boesch; NPPD		x	Coordination with other entities needs to be included in this standard.
The consensus of the commenters was that this standard should be limited to RA to RA coordination. The SAR DT that developed the SAR that led to this standard requested that the NERC OC review the need for a standard that addresses the RA's coordination of activities within its RA Area – the requirement that RAs share their documents with entities within their own footprint would go with this new SAR.			
George Bartlett; Entergy		x	As discussed in our comments to the SAR development team we do not agree that the standard should be limited to RA to RA coordination. We also stated that if this standard is that limited in scope then there must be additional standards developed requiring the coordination among all users of the electric power system.
The consensus of the commenters was that this standard should be limited to RA to RA coordination. The SAR DT that developed the SAR that led to this standard requested that the NERC OC review the need for a standard that addresses the RA's coordination of activities within its RA Area – the requirement that RAs share their documents with entities within their own footprint would go with this new SAR.			
Richard J. Kafka; Pepco		x	While I understand the concerns about the limitations of the Scope, does this seem realistic – Do we not need something, then, that requires the RA to coordinate to operating entities within its area?
The consensus of the commenters was that this standard should be limited to RA to RA coordination. The SAR DT that developed the SAR that led to this standard requested that the NERC OC review the need for a standard that addresses the RA's coordination of activities within its RA Area – the requirement that RAs share their documents with entities within their own footprint would go with this new SAR			
P. D. Henderson / Khaqan Khan; The IMO		x	We support the sharing of RA documents with other RA's.
This is what the standard requires.			
Patti Metro; FRCC (7)		x	We do not agree that this standard should be limited to RA to RA coordination as FRCC expressed in SAR comments on 3/17/03. Would it make more sense to cover all coordination of operations for all reliability functions?

The consensus of the commenters was that this standard should be limited to RA to RA coordination. The SAR DT that developed the SAR that led to this standard requested that the NERC OC review the need for a standard that addresses the RA's coordination of activities within its RA Area – the requirement that RAs share their documents with entities within their own footprint would go with this new SAR			
Operating Reliability Working Group – Southwest Power Pool (9)	x		If the intent of this standard is only for RA to RA coordination, then title of the standard should be changed to Coordinate RA Operations.
Agreed. The SDT will change the title.			
Karl Kohlrus; City Water Light & Power	x		Coordination between Ras and other entities can be treated in a separate standard.
This is what was intended.			
Ed Riley	x		The CAISO agrees that "that the RA share its Operating Procedures, Processes or Plans with entities other than Ras" is beyond the scope of the original SAR but is concerned that this is not lost and is addressed in a standard.
Agreed. The SDT will notify the Director-Standards and request that this item be added to the 'parking lot' list of requirements that may not be addressed by any of the standards currently under development. The SAR DT that developed the SAR that led to this standard requested that the NERC OC review the need for a standard that addresses the RA's coordination of activities within its RA Area – the requirement that RAs share their documents with entities within their own footprint would go with this new SAR.			
William J. Smith; Allegheny Power	x		Allegheny Power can understand the thinking of the SDT in limiting the scope to RA-to-RA coordination. We are however, concerned that these RA to other entity procedures are not included in other SARs. If there are no plans to include the RA to other procedures in other Standards, then they must be included in this Standard.
The SDT will notify the Director-Standards and request that this item be added to the 'parking lot' list of requirements that may not be addressed by any of the standards currently under development. The SAR DT that developed the SAR that led to this standard requested that the NERC OC review the need for a standard that addresses the RA's coordination of activities within its RA Area – the requirement that RAs share their documents with entities within their own footprint would go with this new SAR.			
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)	x		The scope of the standard should define that this is limited to RA to RA coordination. We recognize that this may be adequately covered in the Purpose section where it states that the purpose of the standard is "To ensure that each Reliability Authority's operations are coordinated …"

This matches the interpretation made by the SDT.			
Susan Morris; SERC	x		It is important to have specific requirements for Reliability Authorities to share information with each other, especially its Operating 3P's (Procedures, Processes, and/or Plans); however, Reliability Authorities should not operate in a vacuum from the rest of the industry. This is another reason why the Reliability Authority should be actively involved with the entire operational planning horizon (day 2 through 1 year) because if the only thing a Reliability Authority focuses on is the current hour to next day, then there is no way to incorporate lessons learned or continuous improvement to the Operating 3P's. This potential to promote "RA tunnel vision" could result in less reliable operations.
This standard doesn't have any time constraints.			
A. Ralph Rufrano; NYPA	X		
Roman Carter; Southern Co Gen	X		
Transmission Subcommittee	X		
James Spearman / Florence Belser; PSC of SC	X		
John Horakh; MAAC	X		
William F. Pope; Gulf Power Company	X		
Tom Pruitt; Duke Power (3)	X		
Albert DiCaprio; PJM (4)	X		
Blaine Keener; PSC of MD	X		
Don Gold; BPA (6)	X		
Gerald Rheault; Manitoba Hydro	X		
Guy Zito; NPCC-CP9 (10)	X		
Kathleen Goodman; ISO NE	x		

Marc Butts; Southern Co Svcs (10)	x		
Rick Stegehuis; Wisconsin Electric	x		
Roger Champagne; Hydro Quebec	x		
Stuart Goza; TVA (2)	x		

7. Do you agree with the definitions provided in the front of this standard?

Summary Consideration: The industry generally agrees with the definitions of Operating Procedure, Operating Process, Operating Plan and Outage. Many commenters indicated that the term, 'Operating Scenario' should not be limited to contingencies. Some commenters indicated that the definition of 'Operating Procedure' should be modified indicate that the steps in a procedure 'should' be followed, rather than 'must' be followed. The SDT worked on revising the language in the standard, so that the use of the term, 'operating scenario' has been replaced with 'scenario' to more accurately relay what was intended. 'Scenario' has been defined as a 'possible event'. The term, 'outage' was removed from the list of defined terms. When used in the standard, descriptive language clarifies that the exchange of 'outage' information must address both planned and unplanned outage information. The definition of 'Operating Procedure' was modified to change 'must' to 'should'.

Commenters	Yes	No	Comments
Operating Reliability Working Group – Southwest Power Pool (9)		x	We would suggest changing the definition of Operating Scenario to "An operating *condition* that if left…"
The term was replaced with 'scenario' so that the requirement could be more inclusive. Scenario has been defined as a 'possible event'.			
James Spearman / Florence Belser; PSC of SC		x	An "Operating Scenario" should not in and of itself imply a problem or potential problem. The PSCSC suggests changing the term to "Adverse Operating Scenario". The "Operating Plan" definition should specifically refer to Demand Response programs if they are to be included in a company's black-start procedure.
Agreed that Operating Scenario does not need to imply an actual or potential problem. This term has been revised to just 'scenario' and its definition has been changed to 'possible event'. Requiring the Operating Plan to specifically refer to a specific program does not seem appropriate. There are many different types of Operating Plans – and highlighting just one of these could be interpreted to mean that this is the only type that is required, and that is not what was intended.			
Don Gold; BPA (6)		x	An Operating Scenario does not require a contingency. Outage – I generally do not think of a Transmission line as "equipment". Definition should be "...transmission line or equipment..."
Agreed that Operating Scenario does not need to imply an actual or potential problem. This term has been truncated to just the word, 'scenario' to indicate that this may be any possible event. The SDT removed the term, 'outage' from the list of defined terms. The standard includes descriptive language to indicate how the term should be interpreted, so the definition isn't needed.			
Joseph C. Fleury; NYSRC		x	The operating scenario should be expanded to include "operating condition or event" rather than only a "contingency."

Agreed that Operating Scenario does not need to imply an actual or potential problem. This term has been truncated to just the word, 'scenario' to indicate that this may be any possible event.			
Robert W Waldele; NYISO		x	Operating Scenario should be expanded to include "operating condition or event" rather than only a "contingency." "Operating Procedure" may result in limiting operator action and not be consistent with existing definitions at transmission owner/operator or Control Area operator level.
Agreed that Operating Scenario does not need to imply an actual or potential problem. This term has been truncated to just the word, 'scenario' to indicate that this may be any possible event. The definition of 'Operating Procedure' was modified to change 'must' to 'should'.			
Transmission Subcommittee		x	The Transmission Subcommittee recommends the definition of Operating Scenario as "An operating condition, event, or contingency that if left untended, could have an adverse impact that extends beyond the boundaries of a single Reliability Authority Area."
Most commenters indicated they wanted the term, operating scenario to be modified to remove the implication that an operating scenario could only be associated with an actual or potential problem. The SDT modified the term to just the word, 'scenario'.			
Don Reichenbach; SERC Ops Plng Sub (8)		x	Operating Scenario is defined as "an operating contingency that…" Scenario should not be limited to contingencies. As used in the main body of the document, scenarios should consider system configurations, which include possible contingencies as well as other things. Scenarios should include but are not limited to elements in service, status of var devices, generation output, load, and transfers.
Most commenters indicated they wanted the term, operating scenario to be modified to remove the implication that an operating scenario could only be associated with an actual or potential problem. The SDT modified the term to just the word, 'scenario'.			
Susan Morris; SERC		x	Operating Scenario is defined as "an operating contingency that…" Scenario should not be limited to contingencies. As used in the main body of the document, scenarios should consider system configurations, which include an operating condition, event, or contingency that if left untended, could have an adverse impact that extends beyond the boundaries of a single Reliability Authority Area." Scenarios should include but are not limited to elements in service, status of var devices, generation output, load, and transfers.
Most commenters indicated they wanted the term, operating scenario to be modified to remove the implication that an operating scenario could only be associated with an actual or potential problem. The SDT modified the term to just the word, 'scenario'.			

Rick Stegehuis; Wisconsin Electric		x	Change definition of "Operating Scenario". The term itself and its usage within the document are acceptable. However, it should be defined as any hypothetical operating state, not just one that could have wide area impacts. The usage of "operating scenario" in the document is consistent with this broader definition.
Most commenters indicated they wanted the term, operating scenario to be modified to remove the implication that an operating scenario could only be associated with an actual or potential problem. The SDT modified the term to just the word, 'scenario'.			
Roger Champagne; Hydro Quebec		x	Operating Procedure and Operating Process definitions may result in limiting Operator action and not be consistent with company definitions. We will be commenting on this definition during the posting of the NERC Definitions Document noted in the Standard.
It isn't clear how the definitions of operating procedures and operating processes could limit operator action. While this standard does require adherence to the procedures developed that address communication between RAs, this standard does not require that system operators follow the actions outlined in procedures beyond those that address communication. This recognizes that real time conditions may not match the expected conditions that formed the base for specific actions in an operating procedure. In addition, the definition of 'Operating Procedure' was modified to change 'must' to 'should'. The appropriate time to comment on draft definitions is when they are posted for comment during the drafting of a SAR or standard. There is no separate 'NERC Definitions Document' that will be posted for public comment. The note pasted to the front of all new standards says: "These definitions will be posted and balloted along with the standard, but will not be restated in the standard. Instead, once approved, they will be included in a separate "Definitions" glossary on the NERC website containing definitions relevant to all standards that NERC develops.." The reason for including definitions with each posting of each version of each SAR and Standard is to try and get industry comments on the draft definitions during the development of the SAR and standard. Definitions continue to be refined until the drafting team feels that the industry has reached consensus on the definition. If definitions are accepted by the industry during the balloting of a standard, those definitions are then put into a database of 'approved' definitions. So far, the only definitions that have reached this stage are those that were accepted by the industry with the ballot of the Cyber Security Standard.			
Kathleen Goodman; ISO NE		x	Operating Procedure Definition may result in limiting Operator action and not be consistent with company definitions. We will be commenting on this definition during the posting of the NERC Definitions Document noted in the Standard. "Operating Scenario," is this Standard, implies something significant but this term is used for everyday training events. Suggest changing the terminology so as not to confuse the industry.
While this standard does require adherence to the procedures developed that address communication between RAs, this standard does not require that system operators follow the actions outlined in a procedures beyond those that address communication. This recognizes that real time conditions may not match the expected conditions that formed the base for specific actions in an operating procedure. The definition of 'Operating Procedure' was modified to change 'must' to 'should'. The appropriate time to comment on draft definitions is when they are posted for comment during the drafting of a SAR or standard. There is no separate 'NERC Definitions Document' that will be posted for public comment. The note pasted to the front of all new standards says:			

"These definitions will be posted and balloted along with the standard, but will not be restated in the standard. Instead, they will be included in a separate "Definitions" section containing definitions relevant to all standards that NERC develops." The reason for including definitions with each posting of each version of each SAR and Standard is to try and get industry comments on the draft definitions during the development of the SAR and standard. Definitions continue to be refined until the drafting team feels that the industry has reached consensus on the definition. If definitions are accepted by the industry during the balloting of a standard, those definitions are then put into a database of 'approved' definitions. So far, the only definitions that have reached this stage are those that were accepted by the industry with the ballot of the Cyber Security Standard.			
Guy Zito; NPCC-CP9 (10) A. Ralph Rufrano; NYPA		x	Operating Procedure Definition may result in limiting Operator action and not be consistent with company definitions. We will be commenting on this definition during the posting of the NERC Definitions Document noted in the Standard.
While this standard does require adherence to the procedures developed that address communication between RAs, this standard does not require that system operators follow the actions outlined in procedures beyond those that address communication. This recognizes that real time conditions may not match the expected conditions that formed the base for specific actions in an operating procedure. The definition of 'Operating Procedure' was modified to change 'must' to 'should'. The appropriate time to comment on draft definitions is when they are posted for comment during the drafting of a SAR or standard. There is no separate 'NERC Definitions Document' that will be posted for public comment. The note pasted to the front of all new standards says: "These definitions will be posted and balloted along with the standard, but will not be restated in the standard. Instead, they will be included in a separate "Definitions" section containing definitions relevant to all standards that NERC develops." The reason for including definitions with each posting of each version of each SAR and Standard is to try and get industry comments on the draft definitions during the development of the SAR and standard. Definitions continue to be refined until the drafting team feels that the industry has reached consensus on the definition. If definitions are accepted by the industry during the balloting of a standard, those definitions are then put into a database of 'approved' definitions. So far, the only definitions that have reached this stage are those that were accepted by the industry with the ballot of the Cyber Security Standard.			
George Bartlett; Entergy		x	The definition of Operating Procedure contains the terms "operating positions" and "positions". Please define these terms as used in this standard.
SDTs are only defining terms that they feel may be interpreted differently in a manner that could impact the ability to meet compliance. It seems that most people understand the terms, 'operating positions' and 'positions' as used in the definition of Operating Procedure.			
Albert DiCaprio; PJM (4)		x	Operating Scenarios should be omitted. There is no need for NERC to define what must be used in RA evaluations. Also, Operating Scenarios do not have to be contingency events; they could be as simple as Peak and valley load conditions. Outages should be omitted: is there a real need for this definition? Taking out a mill would constitute "the removal of equipment from service" but hopefully would not be subject to this standard (unless of course the loss of the mill would "take the system down."

			Does it really add anything to understanding the object of the Standard? If not then it should be removed.
Agreed that Operating Scenarios do not need to be limited to contingencies. The term has been revised to say, 'scenarios' and the definition has been adjusted to indicate that a scenario is a 'possible event'. The SDT removed the term 'outage' from the list of defined terms because the language in the standard explains what was intended.			
John Horakh; MAAC		x	Operating Plan: in the first sentence, insert the word "operating" between "some" and "goal". Operating Scenario: a rather vague definition; is this actually used anywhere?
The term 'operating scenario' was used in the first version of this standard. The phrase has been replaced with just the word, 'scenario' and scenario has been defined as a 'possible event'.			
Gerald Rheault; Manitoba Hydro		x	Manitoba Hydro agrees with definitions 1,2,3,and 5. Definition 4 is not very clear and is too restrictive. A better definition would be: " A document that identifies a sequence of events which occurs for a specific operating contingency".
Many commenters indicated they didn't want operating scenarios to be limited to contingencies, so your suggestion wasn't adopted. The term, operating scenario was modified to just the word, 'scenario' and was re-defined as a 'possible event'.			
Karl Kohlrus; City Water Light & Power		x	When the definitions are moved to a separate master definitions document, defined terms should be underlined with active references to their definitions.
The format approved for use in these standards is to capitalize the first letter of all defined terms.			
Alan Boesch; NPPD		x	I do not think they match the definitions that are being provided in the Certification Standards. This may be a sign of a larger problem where different standards have different definitions for the same term. That could lead to confusion in the industry and should be addressed by NERC. Please forward this comment to the NERC compliance/standards office.
The SDT is working with the Certification SDT to try and develop definitions that will meet the needs of both drafting teams.			
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)		x	The definitions for Procedures and Processes are too rigid and may cause conflicts with local definitions. We recommend changing the word 'contingency' to 'condition' in the definition for Operating Scenario.
Many commenters indicated they wanted 'operating scenario' to be expanded to include situations that weren't contingencies. The SDT			

modified the term to just, 'scenarios' and defined this as 'possible events'.			
Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen		x	Operating Procedure – A document that identifies specific steps or tasks that must be taken by one or more specific operating entities to achieve a single specific operating goal. The steps in an Operating Procedure must be followed in the order in which they are presented, and must be performed by the entities identified. A document that lists the specific steps to take in removing a specific transmission line from service is an example of an Operating Procedure. Operating Plan- A document designed to achieve some operational goal utilizing a specific set of coordinated activities. An Operating Plan may contain Operating Procedures and Operating Processes. A company-specific system restoration plan that includes an Operating Procedure for black-starting units, Operating Processes for communicating restoration progress with other entities, etc., is an example of an Operating Plan. Operating Scenario – A detailed model of operating conditions, including contingency conditions that, if left untended, may have an adverse impact that extends beyond the boundaries of a single Reliability Authority Area. The RC analyzes multiple Operating Scenarios to determine under what condition an adverse impact will take place. {Note: an Operating Scenario itself does not imply an adverse impact will take place. It is simply a specific set of conditions that the RC analyses to determine if an adverse impact will take place.}
Most commenters agreed with the definitions for Operating Procedure and Operating Plan. The suggested changes to these terms were not adopted. The term, 'Operating Scenario' was modified to just the word, 'Scenario' to indicate that this could address any 'possible event'.			
P. D. Henderson / Khaqan Khan; The IMO		x	(i) More clarity is needed between an Operating Procedure, an Operating Process and Operating Plan. An Operating Plan looks like a collection of specific Operating Procedures and Operating Processes to achieve a specific goal. (ii) The term "Operating Scenario" does not sufficiently convey the seriousness of the situation as described by the definition. The term could be called such as "potential wide area contingency"
Most commenters indicated they accepted the definitions of 'Operating Procedure' and 'Operating Process'. The term, 'Operating Scenario' was modified to just the word, 'scenario' and the scope was changed to 'possible event' to more accurately reflect that this should not be limited to contingencies.			
Patti Metro; FRCC (7)		x	The definition of Operating Procedure is circular. When developing a definition, the word that is being defined should not be used in the definition.

Most commenters accepted the use of the word, 'operating' within the definition of 'operating procedure'.			
William J. Smith; Allegheny Power	x		Allegheny Power agrees with the definitions, but disagrees with the term "Operating Scenario". The word "scenario" usually referrers to a "what if?" or hypothetical situation. We suggest that "Scenario" be replaced with "Situation".
Most commenters disagreed with the definition of 'operating scenario' and this has been changed. The term has been revised to just, 'scenario' and its definition is 'possible event'.			
Ed Riley; CA ISO	x		In general the CAISO agrees with the definitions. The definitions used in all Standards needs to be coordinated.
Agreed.			
Richard J. Kafka; Pepco	X		
Stuart Goza; TVA (2)	X		
Peter Burke; ATC	X		
Blaine Keener; PSC of MD	X		
Don Chandler; CenterPoint Energy (2)	X		
William F. Pope; Gulf Power Company	x		

8. Do you agree with the requirement (101)?

Summary Consideration: Most industry commenters agree with this requirement. Most of the commenters who disagreed with the requirement were opposed to the use of the word, 'approve'.
The intent of the requirement is not for one RA to 'approve' other RAs operating procedures, but rather to 'agree' to take the specified actions identified in the procedure. Evidence of agreement could be in many different forms and is not necessarily as narrowly defined as a signature on the Operating Procedure. The standard has been revised to replace 'approve' with 'agree to'.

Commenters	Yes	No	Comments
Operating Reliability Working Group – Southwest Power Pool (9)		x	While we understand the need to coordinate operating procedures with all involved parties, requiring their approval may be asking too much. What would happen if all involved parties did not agree to the procedure, is there an arbitration process? We suggest adding the word "credible" in front of operating scenarios in Requirement (3)(ii).
Agreed. The requirement has been changed to replace 'approve' with 'agree to'.			
Robert W Waldele; NYISO Joseph C. Fleury; NYSRC		x	The Standard is risking creating a administratively burdensome process. System Restoration is an unusual (and unlikely) event that doesn't belong with the routine of normal operation. Restoration has unique requirements that are beyond normal coordination of operations. Has the SDT considered a separate section to address coordination of restoration?
The documentation requirements in the standard have been modified so they should be less burdensome. System restoration should not be considered with normal operations. There is another SAR that will address system restoration in great detail – and we have removed it from this requirement.			
Alan Boesch; NPPD		x	1. It is unreasonable to expect that Ras will approve each others plan. Distribution to the RA with requirement for review seems more appropriate. 2. Coordination of Capacity shortages should also be with the associated BA 3. Coordination of Voltage should also be with the associated TOP 4. Coordination of system restoration should also be with the associated BAs. 5. Requirement 4 says "may". It must not be a requirement if it says "may".
1. The requirement has been changed to replace 'approve' with 'agreed to' – the requirement to distribute the documents was retained.			

2-4. This standard is limited in scope to the coordination between RAs. 5. The SDT modified this requirement to eliminate the use of the word, 'may'.			
Blaine Keener; PSC of MD		x	The proposed Standard does not address the issue that with the same NERC reliability criteria the Reliability coordinators and control areas have adopted differing interpretation of the functions, responsibilities, authorities, and capabilities needed to operate a reliable power system. The procedure that requires each Reliability authority's Operating Procedure, Processes or Plans to be approved by other reliability authorities is unrealistic without a method to resolve the differences in interpretation.
Following the August 14 Blackout, the need to improve the understanding of the authorities between the various operating entities became most clear. NERC is working to help improve this understanding by revising some of its existing Operating Policies and by trying to advance the process designed to ask entities to declare which 'functions' it intends to perform (using the functions listed in the Functional Model.) This standard and all new standards developed under the NERC Reliability Standards Process must use the Functions from the Functional Model to identify which entity is responsible for complying with the requirements. The intent of this 'approval' process was to ensure that there was some type of formal agreement between the involved RAs to commit to take the actions identified in the procedure. Use of the term, 'approve' was not endorsed by the industry, and the requirement has been changed to reflect that RA's must obtain 'agreement' from those RAs that are expected to take actions as part of a procedure.			
George Bartlett; Entergy		x	We disagree and recommend the deletion of Requirement 101(a)(2) which states that "Each Reliability Authority's Operating Procedures, Processes or Plans shall be approved by all the Reliability authorities". We agree that Ras should develop, discuss, and coordinate Operating Procedures, Processes or Plans with neighboring Ras and neighboring Ras should comment on those Operating Procedures, Processes or Plans. However, neighboring Ras should not have "approval" rights over those Operating Procedures, Processes or Plans unless neighboring Ras have to take real time action as provided in the procedure.
Agreed. The requirement has been changed to replace 'approve' with 'agreement'. The intent was to ensure that the involved RAs would have some formal commitment that each RA expected to take an action as part of the procedure had committed to take that action under the specified conditions.			
Patti Metro; FRCC (7)		x	Is a "document change control procedure " really necessary? A Reliability Authority is obligated to notify other Reliability Authorities if a change can jeopardize reliability.
The industry is divided on the issue of whether a Document Change Control Procedure is necessary. The standard was modified to delete the requirement for a document change control procedure and replaced it with the specific items that seemed to be supported by the industry's comments.			

Don Chandler; CenterPoint Energy (2)		x	Any plan addressing reliability of the system without including all entities responsible for reliability is like having no plan. –RTS
The requirement does not limit the scope of entities that can be included in any of the processes, procedures or plans. If a document includes actions of those entities that report to the RA as well as other RAs, we envision the RA would involve all those who are expected to take actions, not just the other involved RAs. However, the standard will only Require that the RA that authors a procedure obtain agreement from the RAs that are required to act as part of that procedure.			
Don Gold; BPA (6)		x	What happens if "all" the Ras do not approve the plan? There are times when something occurs and a solution developed but not all Ras agree. Should the situation be ignored until all the political problems are worked out and all parties finally agree, or should the plan be put in place while the agreement is reached. It happens where entities can not agree to a plan that the separate dispatch offices actually follow as there is no other choice. This standard needs to deal with coordination, which does not imply approval. The standard should focus on a process for notification and coordination, meaning advanced notification of procedures that impact other Ras and an opportunity to comment. Each Region should have procedures for coordination among Ras for those procedures that are deemed to be critical and impact multiple Ras.
The requirement has been changed to replace 'approve' with 'agree to'. The intent was to ensure that the involved RAs would have some commitment that each RA expected to take an action as part of the procedure had committed to take that action under the specified conditions. If the involved RAs haven't agreed to take actions as specified in a document, then there is no commitment to follow that procedure under the specified conditions and there is no assurance that the actions needed to support reliability will be taken .			
Marc Butts; Southern Co Svcs (10)		x	In 101 (a) (1) if you are saying that the RA should develop procedures, then we disagree. Our feeling is that the transmission owners and operators should develop all procedures and supply those to the RA for implementation and oversight. If this wasn't what you meant, please clarify. The SDT may want to consider adding Policy or Standard references to each sub-bullet in 101.1.3, since most, if not all, are covered by detailed requirements in one or the other. Section 101 (a) (2) needs to be re-written to make the intent clear. It is a very long, rambling sentence that is hard to understand. Many may misinterpret it.
The standard does not specify which entity is responsible for developing the procedures. There are many different practices in place today and we aren't trying to force a 'one size fits all'. This standard requires that the RA 'have' documents in place to address the identified topics. Because most of the other standards aren't written, and when they are written they will displace existing Policies, the suggestion to include the references to other standards hasn't been adopted. The standard has been revised to subdivide 101(a)(2) so that it is easier to understand.			

Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)	x		Whereas we agree with the intent of the requirement, we are concerned with the prospect of creating a burdensome bureaucracy to administer the process. Requirement (2) for approving standards goes too far as written. RA to RA procedures need to be agreed to by all parties involved. We recommend that Requirement 3ii be modified to state "Identified credible operating scenarios."
The requirement has been changed to replace 'approve' with 'agree to' The SDT also replaced the term, "operating scenarios" with 'scenarios' in support of the many commenters who indicated they wanted 'operating scenarios' to address more than just contingencies.			
Albert DiCaprio; PJM (4)	x		Delete first line of Requirement 101 (a) 4. (The rest of the requirement is OK) The term "may develop" means that it is NOT REQUIRED. All such explanatory material belongs in Technical documents not in the Standard itself.
The standard has been revised to omit the need for the use of the word, 'may'.			
Roger Champagne; Hydro Quebec	x		Could such Operating Procedures, Process or Plans developed at a Regional Council level (i.e. NPCC, etc.) be acceptable if approved by the RA in that Council?
As envisioned, these would be acceptable as long as they covered all the required topics.			
Ed Riley; CA ISO	X		
Stuart Goza; TVA (2)	X		
Peter Burke; ATC	X		
Roman Carter; Southern Co Gen	X		
Susan Morris; SERC	X		
Richard J. Kafka; Pepco	X		
A. Ralph Rufrano; NYPA	X		
Transmission Subcommittee	X		
P. D. Henderson / Khaqan Khan; The IMO	X		

James Spearman / Florence Belser; PSC of SC	X		
John Horakh; MAAC	X		
Karl Kohlrus; City Water Light & Power	X		
William F. Pope; Gulf Power Company	X		
William J. Smith; Allegheny Power	X		
Tom Pruitt; Duke Power (3)	X		
Rick Stegehuis; Wisconsin Electric	X		
Kathleen Goodman; ISO NE	X		
Don Reichenbach; SERC Ops Plng Sub (8)	X		
Gerald Rheault; Manitoba Hydro	X		
Guy Zito; NPCC-CP9 (10)	X		

9. Do you agree with the measures?

Summary Consideration: Most commenters support the measures as presented. There were some suggestions that one of the elements in the measures (system restoration) should be in a stand-alone standard, and other suggestions that some of the measures were duplicative. The SDT modified the measures to remove the reference to System Restoration, and has eliminated the duplication in the list of topics that must be addressed.

Commenter	Yes	No	Comments
Joseph C. Fleury; NYSRC Robert W Waldele; NYISO			(same as #8 above) (The Standard is risking creating an administratively burdensome process. System restoration is an unusual (and unlikely) event that doesn't belong with the routine of normal operation. Restoration has unique requirements that are beyond normal coordination of operations. Has the SDT considered a separate section to address coordination of restoration?)
The documentation requirements in the standard have been modified so they should be less burdensome. System restoration should not be considered with normal operations. There is another SAR that will address system restoration in great detail – and we have removed it from this requirement.			
Richard J. Kafka; Pepco		x	What makes (1) different from (3)? – (3) seems to be a restatement and enlargement of (1). (2) could be incorporated into (3) by inclusion of one phrase; "operating scenarios." This seems to be an editorial oversight and is troubling in a document that has gone through a review process. Should (1) and (2) be eliminated?
Agreed. The SDT had originally considered normal and emergency situations addressed in (1) to be different from the list of items included in (3). While the documents addressed in 1 and 3 are envisioned as 'guidelines' – the documents addressed in 2 are intended to address very specific identified operating scenarios – such as response to a particular tie line or response to reactive problems on a particular interface.			
Alan Boesch; NPPD		x	➢ Requirement 1 is not measured. It appears that requirement 3 contains the details of requirement 1. If so combine them. Ø There should be a requirement to implement processes, procedures and plans as written. Simply having the processes, procedures and plans does not assure reliability.
Agreed. The SDT had originally considered normal and emergency situations addressed in (1) to be different from the list of items included in (3). Because real-time conditions often do not mimic the 'planned' conditions, the standard does not require following these procedures.			

Don Chandler; CenterPoint Energy (2)		x	The measures only address RA to RA plans and do not address coordination with others. There may be some feeling that this will be accomplished through agreements. It is our feeling that this will place a burden on other entities effected by actions of the Reliability Authority without coordination and the end result will be adversary relationships and conflicting efforts. –RTS
The requirement does not limit the scope of entities that can be included in any of the processes, procedures or plans. If a document includes actions of those entities that report to the RA as well as other RAs, we envision the RA would involve all those who are expected to take actions, not just the other involved RAs. However, the standard will only Require that the RA that authors a procedure obtain formal agreement from the RAs that are required to act as part of that procedure.			
Don Gold; BPA (6)		x	Why should the system operator have a copy of a plan for automatic exchange of information or data? (b1) Daily communication is not necessary. All that is necessary is that all impacted Ras have the information that they need to assess the system. This is accomplished through outage reporting (both planned outages and real time outages). The RA is not responsible for the resolution of energy and capacity shortages. The RA ensures the real-time operating reliability of the interconnected bulk electric transmission system. The RA may not have any procedures that require notification or coordination between Ras for voltage control (at least at the system operators level). There may be joint procedures for voltage problems, such as voltage collapse.
The procedure for exchanging data is expected to identify what data must be exchanged. Having a copy of the procedure ensures that the system operator knows what information should be exchanged in preparation for the exchange. Exchange of data can be much more extensive than just updating one another on outages. This can include items such as weather advisories, security alerts, etc. The requirement for daily communication has been eliminated. Under the Functional Model, the RA has ultimate responsibility for reliability within its RA Area. If the Balancing Authority is unable to resolve energy or capacity shortages, it falls to the RA to direct actions before there is a serious risk to the reliability of the interconnection. Under this standard, if voltage control in the RA's area may be impactive to other RAs, then the RA should notify other RAs when the condition exists.			
Rick Stegehuis; Wisconsin Electric		x	A measure should be added for operator training. Operators should be trained in

			procedures, not just have them available, and the training should be documented.
The SDT agrees that operator training is important – however the need for training associated with this topic wasn't identified during the development of the SAR. The NERC Personnel Subcommittee has indicated they intend to draft and submit a SAR that addresses operator training from a more global perspective.			
Susan Morris; SERC	x		However, real-time lessons learned should be documented and incorporated in the Operating 3P's (Procedures, Processes, and Plans) as appropriate. We are unsure how much improvement to reliability is gained from operators just having access to the procedures in the absence of a training requirement. The Reliability Authorities should encourage operators to be engaged in the goal to achieve reliable operations.
The SDT agrees that operator training is important – however the need for training associated with this topic wasn't identified during the development of the SAR. The NERC Personnel Subcommittee has indicated they intend to draft and submit a SAR that addresses operator training from a more global perspective.			
Don Reichenbach; SERC Ops Plng Sub (8)	x		We are unsure how much improvement to reliability is gained from operators just having access to the procedures in the absence of a training requirement.
The SDT agrees that operator training is important – however the need for training associated with this topic wasn't identified during the development of the SAR. The NERC Personnel Subcommittee has indicated they intend to draft and submit a SAR that addresses operator training from a more global perspective.			
James Spearman / Florence Belser; PSC of SC	X		
John Horakh; MAAC	X		
Peter Burke; ATC	X		
Roman Carter; Southern Co Gen	X		
Karl Kohlrus; City Water Light & Power	X		
William F. Pope; Gulf Power Company	X		
William J. Smith; Allegheny Power	X		

Tom Pruitt; Duke Power (3)	X		
Albert DiCaprio; PJM (4)	X		
Blaine Keener; PSC of MD	X		
George Bartlett; Entergy	X		
Gerald Rheault; Manitoba Hydro	X		
Guy Zito; NPCC-CP9 (10)	X		
A. Ralph Rufrano; NYPA	X		
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)	X		
Kathleen Goodman; ISO NE	X		
Marc Butts; Southern Co Svcs (10)	X		
P. D. Henderson / Khaqan Khan; The IMO	X		
Patti Metro; FRCC (7)	X		
Roger Champagne; Hydro Quebec	X		
Stuart Goza; TVA (2)	X		
Operating Reliability Working Group – Southwest Power Pool (9)	X		
Ed Riley; CA ISO	X		

10. Do you agree with the compliance monitoring process?

Summary Consideration: While most commenters supported the compliance monitoring process, there were some suggestions for improvements that have been adopted by the SDT and are reflected in the revised standard.

Commenters	Yes	No	Comments
Don Reichenbach; SERC Ops Plng Sub (8)			Does item 3 imply annual on-site audits (spot checks)? Should audit frequencies be dictated in the standard? While it is appropriate to prescribe compliance review/assessment frequency, setting on-site audit frequency is very different due to things such as costs and availability of audit team participants.
Audits are not intended to be the same as 'spot checks'. Audits are scheduled in advance and generally include an on-site visit. There is nothing in the Standards Process Manual that precludes the inclusion of 'audit frequencies' in the standard. Having operating processes, procedures and plans in place, and agreement between RAs to act in accordance with those documents, is very important, and should be supported with a definitive review cycle.			
Robert W Waldele; NYISO			consistent throughout the document is the fact that the requirements and measures take about one page each, but the compliance monitoring and levels of non-compliance takes up to FIVE pages.
The requirements and measures are intended to be succinct statements of end performance. The standard includes all of the required elements as defined in the NERC Reliability Standards Process Manual. The Compliance Monitoring section is intended to address 'how' the requirements will be assessed, and does require more words. As the industry has gained more familiarity with the standards development process, the industry commenters have requested more details in the compliance monitoring section of the standards. The Levels of Noncompliance are the most complex in a requirement such as this that contains many different elements. If you have specific suggestions for shortening the compliance elements, please forward them to the SDT for their consideration.			
James Spearman / Florence Belser; PSC of SC		x	The Compliance Monitoring process should be initiated for any recognized reduction in reliability or actual unanticipated outage. The procedures should be reviewed and revised as necessary to account for lessons learned
The scenario you've described would be considered an investigation upon a complaint. The documents need to be revised for many reasons, not just lessons learned. Procedures, processes and plans may need to be revised to reflect changes in system topology, changes in contact information, changes in names of departments or personnel, etc. There was no industry consensus on having a document change control procedure in this standard. The SDT will see if the industry will support a requirement to review and update these documents on a periodic basis. The standard has been revised and proposes that these Operating Processes, Procedures and Plans be revised annually.			

Alan Boesch; NPPD		x	The compliance monitoring process should provide a review of implementation of the processes, procedures and plans as written. The compliance could be measured when an incident occurs that would require the use of the process, procedure or plan. The compliance monitor could check for proper implementation of the process, procedure or plan using investigation techniques such as questionnaires sent to other entities involved.
Requirement 102 includes language indicating that the RA must follow its procedures, processes and plans for making notifications and exchanging reliability-related information with other Reliability Authorities. The standard does not require full implementation of all the operating processes, procedures and plans, and therefore the compliance monitoring process can't look for that. As stated in response to your suggestion that entities be required to follow the procedures as written – this isn't practical because the real-time conditions don't always match the planned conditions. You don't want to force an RA to follow a procedure that isn't applicable to the conditions at hand and if you penalize an RA for not following the procedure, that could happen.			
Don Gold; BPA (6)		x	Self certification annually is a lot of busy work. Once every 3 to 5 years, as determined by the Region (Compliance Monitor) is adequate. d.3 indicates that the Compliance Monitor shall use an ANNUAL spot check. There is no need for an annual spot check unless the RA has been reported to be deficient or through the self certification has indicated a deficiency. Then the RA should be checked as often as necessary in order to come up to compliance. d.5 indicates the reset period. What is the occurrence period? Also the RA shall keep documentation for the prior year – What documentation is to be kept and how. The system operator should not have to keep superceded procedures whereby he/she could get confussed. Only the current procedure should be available to the system operators.
The SDT considered having self-certification be done on a less frequent basis than every year, but there was a sense that having to review the procedures annually would promote keeping the documents up to date. Most commenters didn't reject the concept of the annual spot check, so it has not been removed. Most standards have proposed a periodic audit of once every three years – in this standard the SDT felt that going 3 years between audits may be too long – and also felt that reviewing all of the RA's procedures may be more than is needed. The annual spot check seemed to provide sufficient incentive to keep the documents up to date. The occurrence period and reset period are both one calendar year. The documentation that must be kept for the Compliance Monitor is listed under (d) (3).			
Roger Champagne; Hydro Quebec Guy Zito; NPCC-CP9(10)		x	The Item (4) timing seems to be off somewhat and needs clarification.

Agreed. This has been corrected.			
Joseph C. Fleury; NYSRC		x	The Item 4 timing seems to be off somewhat, and needs clarification. Also, consistent throughout the document is the fact that the requirements and measures take about one page each, while compliance monitoring and levels of non-compliance take up to five pages.
The requirements and measures are intended to be succinct statements of end performance. The standard includes all of the required elements as defined in the NERC Reliability Standards Process Manual. The Compliance Monitoring section is intended to address 'how' the requirements will be assessed, and does require more words. As the industry has gained more familiarity with the standards development process, the industry commenters have requested more details in the compliance monitoring section of the standards. The Levels of Noncompliance are the most complex in a requirement such as this that contains many different elements. If you have specific suggestions for shortening the compliance elements, please forward them to the SDT for their consideration.			
Patti Metro; FRCC (7)		x	See attached red-line version with suggested FRCC changes.
Most of the suggested format changes were adopted and are reflected in the revised standard.			
Kathleen Goodman; ISO NE		x	
Richard J. Kafka; Pepco	x		Agree with the general process considering the apparent overlap among (1) (i), (ii) and (iii), similar to what is described in "measures," above.
The standard has been revised to remove the duplication.			
Blaine Keener; PSC of MD	x		The existing process for monitoring and assuring compliance with NERC and regional reliability standards was shown to be inadequate to identify and resolve specific compliance violation before those violations led to a cascading blackout. The proposed Compliance Monitoring Process does not resolve this problem and is not effective in case of disagreement between different Reliability authorities.
The NERC Reliability Standards Process Manual identifies the elements that must be included in NERC's Reliability Standards. Adding additional elements is outside the scope of the SDT. The compliance program currently in effect is voluntary – new standards are being developed with the assumption that federal legislation will give NERC enforcement capability.			
P. D. Henderson / Khaqan Khan; The IMO	x		In section d (3), the clause pertaining to "3 business days notice" for annual spot check may be removed. We feel that the clause mentioned in the same section i.e. "sufficient time to comply with control center's security access procedure" for annual spot check is appropriate and sufficient in itself.

The annual spot check has been removed from this requirement. With the information requested in the annual self-certification, the Compliance Monitors will have sufficient information to verify that these documents are being updated and distributed between RAs. If there are mis-matches in the information collected, the Compliance Monitor can conduct an investigation upon complaint.			
Rick Stegehuis; Wisconsin Electric	x		Include audit of training documentation as noted in 9.
Since the standard doesn't include a training requirement, it can't be added to the compliance monitoring process.			
Susan Morris; SERC	x		Add the word "reviewed" to 101 (d) Compliance Monitoring Process, Item (6)(iv) as follows: Evidence that its Operating Procedures, Processes or Plans were approved, updated, distributed and reviewed in accordance with its Document Change Control Procedure.
There is no industry consensus on keeping the document change control procedure requirement, and since this wasn't in the associated SAR, this requirement has been dropped from the standard.			
A. Ralph Rufrano; NYPA	x		The Item (4) timing seems to be off somewhat and needs clarification.
Agreed. This has been corrected.			
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)	x		The Item (4) timing seems to be off somewhat and needs clarification. This entire area needs clarity.
Agreed. Item 4 has been corrected.			
Peter Burke; ATC	x		There seems to be a slight discrepancy between number (1) and number (6). The following is a suggestion on how the discrepancy could be corrected. Delete only "(ii) Activities that require coordination between Reliability Authorities:" under (6). The way it is currently written, those items listed under (iii) do not have to be the latest versions. Lastly, the group should also include in the list under (6) a statement similar to that under (2), a section dealing with company specific versions.
This section was formatted incorrectly and has been corrected. Because the heading for this section didn't distinguish between documents that were/were not authored by the RA, the SDT didn't think it was necessary to include a separate section for company-specific versions of these documents – in other words, the company-specific versions were assumed to be included.			

Don Chandler; CenterPoint Energy (2)	X		
Stuart Goza; TVA (2)	X		
Roman Carter; Southern Co Gen	X		
George Bartlett; Entergy	X		
John Horakh; MAAC	X		
Karl Kohlrus; City Water Light & Power	X		
William F. Pope; Gulf Power Company	X		
William J. Smith; Allegheny Power	X		
Tom Pruitt; Duke Power (3)	X		
Gerald Rheault; Manitoba Hydro	X		
Operating Reliability Working Group – Southwest Power Pool (9)	X		
Marc Butts; Southern Co Svcs (10)	X		
Ed Riley; CA ISO	X		

11. Do you agree with the levels of non-compliance?

Summary Consideration: There was no consensus on this issue – but most commenters did not agree with the proposed levels of non-compliance. Several commenters indicated the levels were too complex, and some indicated uncertainty about how the % would be calculated. The levels of non-compliance have been adjusted to remove the %, and to eliminate the complexity.

Commenters	Yes	No	Comments
Don Reichenbach; SERC Ops Plng Sub (8)			The levels of non-compliance are difficult to follow due to the large number of OR statements. We would be interested to know how the SDT arrived at the % levels for the different levels of non-compliances.
All of the more complex requirements that include multiple measures are difficult to address within the four levels of non-compliance. The % levels were 'targets' developed to give the industry a starting point for discussion. If you have suggestions for alternate levels of non-compliance, please submit them to the SDT. The SDT tried to simplify the complexity by limiting the number of 'OR' statements and be eliminating the references to %.			
Susan Morris; SERC			The levels of non-compliance are difficult to follow due to the large number of "OR" statements.
All of the more complex requirements that include multiple measures are difficult to address within the four levels of non-compliance. The % levels were 'targets' developed to give the industry a starting point for discussion. If you have suggestions for alternate levels of non-compliance, please submit them to the SDT. The SDT tried to simplify the complexity by limiting the number of 'OR' statements and by eliminating the references to %.			
Robert W Waldele; NYISO			(same as #10 above) (consistent throughout the document is the fact that the requirements and measures take about one page each, but the compliance monitoring and levels of non-compliance takes up to FIVE pages.)
All of the more complex requirements that include multiple measures are difficult to address within the four levels of non-compliance. The % levels were 'targets' developed to give the industry a starting point for discussion. If you have suggestions for alternate levels of non-compliance, please submit them to the SDT. The SDT tried to simplify the complexity by limiting the number of 'OR' statements and by eliminating the references to %.			
James Spearman / Florence Belser; PSC of SC		x	The approach adopted by the SDT appears to be compliance-based rather than performance-based. Is the objective having procedures on hand or a reliable system? The PSCSC maintains that the real objective is reliability, and not readily available procedures. The real measure of success is effective implementation of the procedures such that reliability is not compromised.

The real-time conditions don't always match the conditions that were expected to be in place. If the standard required entities to follow the procedures, as written, we would be jeopardizing reliability by requiring the real time system operator to follow a document whether it is appropriate to the situation or not. If an RA goes to the effort of working with other RAs to develop a procedure, then the entities have at least recognized that a situation requiring coordinated action may occur, and the involved entities will have agreed, in advance, on what actions should be taken to resolve the situation to protect the reliability of the interconnected grid.			
William F. Pope; Gulf Power Company		x	There is room to tighten them up a bit.
Please be more specific in sharing levels that you think are more appropriate. The SDT modified the levels of non-compliance to remove the references to %.			
Tom Pruitt; Duke Power (3)		x	The rules for each level are too complicated. See overall comments at the end of this form.
See responses at the end of this form.			
Alan Boesch; NPPD		x	Why do you have a level of non-compliance for a process, procedure or plan that "may" be required?
The standard has been revised as you suggested in another comment, to eliminate the use of the word, 'may'.			
Albert DiCaprio; PJM (4)		x	Need more specificity. It is not clear what the % is of. Does one add the number of documents plus the number of oral agreements plus the numbers of procedures used in say switching jointly owned facilities?
During the annual self-certification each RA is required to provide a list of documents. As envisioned, the % would have been derived from that list. Based on the many commenters who disagreed with the use of %, the SDT rvised the levels of non-compliance to eliminate the reference to %.			
Richard J. Kafka; Pepco		x	I am willing to accept these high levels of non-compliance (10% bands, etc.) given that there may be a small number of documents such that 1 or 2 constitutes 10%, but it begs the issue of why even this should be permitted.
The levels of non-compliance need to meet the industry's needs – if you think other % are more appropriate than those that were proposed, please make a specific suggestion. Obtaining 100% compliance is the goal. There were many commenters who disagreed with the use of %, and the SDT removed these from the levels of non-compliance. As revised, the levels of non-compliance require greater conformance with the requirements.			

Ralph Rufrano; NYPA Guy Zito; NPCC-CP9 (10) Kathleen Goodman; ISO NE Roger Champagne; Hydro Quebec		x	With the existing wording, "…it has developed or received from other Reliability Authorities…", we are not sure that first and second references to (iii) & (iv) make sense. For example, you would not have evidence of a document being updated through a Change Control Procedure if it was obtained from another RA; also, you would not have evidence of its distribution given the same situation. There is also an inconsistency in numbering and multiple references to either (A), (B), (C)…or (i), (ii), (iii) under one non-compliance level makes the non-compliance section very confusing. We would like the drafting team to clarify the non-compliance levels and address practical measurability.
Agreed. This section of the standard has been revised as noted.			
Don Gold; BPA (6)		x	Not all RAs have need for the topics listed. Therefore, in order to not be Sanctioned, procedures will have to be developed that are a waste of effort and time and could lead to confusion. The other measures are a lot of work with very little gain.
Please be more specific in identifying which of the topics you feel wouldn't need to be addressed by any RA. If an entity feels that it has been dealt with in an unfair manner, that entity may use the Dispute Resolution Process. As envisioned, if a requirement weren't applicable to an entity, then the compliance monitor would act responsibly and not sanction the entity being reviewed.			
Joseph C. Fleury; NYSRC		x	(same as #10 above) (The Item 4 timing seems to be off somewhat, and needs clarification. Also, consistent throughout the document is the fact that the requirements and measures take about one page each, while compliance monitoring and levels of non-compliance take up to five pages.)
Agreed. This section of the standard has been revised as noted. The levels of non-compliance have been simplified in response to the many commenters who thought they were too complex.			
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)		x	The intent of the 'associated source document' is unclear as written.
Here is an example: RA#1 develops a large procedure (15 pages long called "Save RA#1's System) that requires the support of all of the entities within its RA Area and also with RA#2. RA#2 has only 2 actions in the 15 page procedure, so RA#2 develops a brief one page company-specific procedure for its system operators to support the "Save RA#1's System" procedure. RA#2 calls its abbreviated procedure, "Act to Help Save RA#1's System." This standard requires that RA#2 have both the full procedure from RA#1 as well as the abbreviated procedure it has developed. The reason for requiring RA#2 to have both the abbreviated document it has developed as well as the original procedure from RA#1 (which is the associated source document) is to ensure that if things don't go as planned, the system operators working for RA#2 can reference the original or source document and get a better idea of all of the actions that should be taking place, not just the actions that are assigned to that RA. This provides an additional opportunity for full 'situational awareness'.			

Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen		x	Confusing and disorganized. Concept may be OK, but needs to be organized into tables or other graphical format that is readily accessible.
There were many comments indicating this section needs simplification, and the SDT has tried to simplify the information so the intent is easier to understand.			
Patti Metro; FRCC (7)		x	The levels of non-compliance for Requirement 101 are unclear. How is the % measured and what is it a % of? In addition for Level Two, "There shall be a level two noncompliance if either of the following conditions exist:" The word "either" implies that only two conditions are being compared, where there are actually three conditions being compared. This section should be consistent with the remainder of the standard and the word "either" should be replaced with the word "any".
During the annual self-certification each RA is required to provide a list of documents. As envisioned, the % would have been derived from that list. Because so many commenters didn't like the use of %, the SDT developed revised levels of non-compliance that do not use %.			
Rick Stegehuis; Wisconsin Electric		x	The percentage measures may be difficult to determine in practice and are too lenient. Suggest using fixed number criteria.
Because each RA has a different scope of operations – some RAs may have many procedures, while other RAs will only have a few. Using a % seemed to equalize the sanctions. However, there were many commenters who disagreed with the use of %, and the SDT modified the levels of non-compliance so % are not used.			
Gerald Rheault; Manitoba Hydro	x		These levels appear to be fair; however administering this process may be quite complicated for the compliance monitor.
During the annual self-certification each RA is required to provide a list of documents. As envisioned, the % would have been derived from that list. Because so many commenters didn't like the use of %, the SDT developed revised levels of non-compliance that do not use %.			
Peter Burke; ATC	x		Please see comments listed under #10. (There seems to be a slight discrepancy between number (1) and number (6). The following is a suggestion on how the discrepancy could be corrected. Delete only "(ii) Activities that require coordination between Reliability Authorities:" under (6). The way it is currently written, those items listed under (iii) do not have to be the latest versions.

			Lastly, the group should also include in the list under (6) a statement similar to that under (2), a section dealing with company specific versions.)
There were many comments indicating this section needs simplification, and the SDT has tried to simplify the information so the intent is easier to understand.			
Ed Riley; CA ISO	X		
George Bartlett; Entergy	X		
John Horakh; MAAC	X		
Karl Kohlrus; City Water Light & Power	X		
William J. Smith; Allegheny Power	X		
Stuart Goza; TVA (2)	X		
Blaine Keener; PSC of MD	X		
Don Chandler; CenterPoint Energy (2)	X		
P. D. Henderson / Khaqan Khan; The IMO	X		
Operating Reliability Working Group – Southwest Power Pool (9)	x		

12. Do you feel the minimum list of topics is sufficient? If not, please identify what other topics should be added to this requirement.

Summary Consideration: Most commenters indicated that the minimum list of topics is sufficient.

Commenters	Yes	No	Comments
Albert DiCaprio; PJM (4)			Operators must have procedures for handling the reliability consequences of all conditions whether or not they are on such a list. Punishing an RA for not having an Energy Shortage Plan is not as important as having a plan to handle instability or handling adverse voltage conditions or IROL conditions. Such list is not relevant. In an open market it is not possible to order coal conservation. A supplier has no obligation to adjust its fuel reserves on the bases of shortages in another supplier's fuel. It is possible to order load shedding or tie flow adjustments. It is possible to require emergency procedures. But all those procedures would be shared among RAs anyway.
History has shown that not all operating entities have the procedures they should have to give their system operators guidance on how to address credible operating scenarios. We assume you are suggesting that the list provided is not properly skewed to identify the most critical topics for system operators and that you are suggesting instability and IROL conditions should be added to the list because they are more critical than addressing energy shortages. The IROL Standard does require the RA to have plans in place for preventing and mitigating instances of exceeding IROLs, so the SDT won't duplicate the requirement here.			
Don Reichenbach; SERC Ops Plng Sub (8)			For many areas (and the number is increasing) the manner in which operators identify and deal with stability issues is very important.
Agreed. Stability could be addressed as a voltage issue included in 101(b)(1)(iv).			
Don Gold; BPA (6)			The minimum list includes topics that may not be required. If a minimum list is necessary it should be developed by the Region and/or the compliance monitor specifically for each RA. The minimum list includes topics that may not be required. If a minimum list is necessary it should be developed by the Region and/or the compliance monitor specifically for each RA.
If the list is developed by the Region, then that list would be considered a Regional requirement – not a NERC Standard. Compliance Monitors verify that NERC Reliability Standards are being followed – their job is not to establish the standards.			
Alan Boesch; NPPD		x	There should be a list of items that are coordinated with BAs and TOPs.

Agreed. But that is outside the scope of this standard which is limited to RA to RA coordination.			
Joseph C. Fleury; NYSRC Robert W Waldele; NYISO		x	Restoration does NOT belong on the list. Market-based procedures that are used by operations, or affect operations, may need to be documented (and exchanged with neighboring entities?).
Agreed. This has been removed. Market-based procedures may need to be exchanged between RAs but addressing those procedures is outside the scope of this standard which is limited to activities needed to support the reliability of the interconnected grid.			
Roger Champagne; Hydro Quebec		x	Add weather advisory
Weather advisories could be included in 101(b)(1)(i) as one of the items that should be provided to other RAs in a communication and notification Procedure, Process or Plan.			
Gerald Rheault; Manitoba Hydro	x		To ensure that the complete set of required topics in 101.a.3 is addressed, the wording in the requirements could be modified to the following; "Reliability Authority Operating Procedures, Processes or Plans shall collectively address all critical topics required to ensure reliability including but not limited to the following:"
The SDT revised the standard to adjust the topics in the list and to require that all topics on the list be addressed. While this doesn't go as far as you've suggested, there are other standards that require other procedures, processes and plans, and we don't want to imply that we are going to assess those documents in more than one standard.			
Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen	x		We would suggest adding some reference to "good utility practice" or something like it somewhere. We know it's not "crisp," but it does alert the RC that there may be other requirements that no one has thought of yet.
We researched FERC's definition of 'good utility practice' – and the definition is not definitive enough to be used in a measurable standard.			
Susan Morris; SERC	x		However, for many areas (and the number is increasing) the manner in which operators identify and deal with stability issues is very important.
Stability could be addressed as a voltage issue included in 101(b)(1)(iv).			
Operating Reliability Working Group – Southwest Power Pool (9)	x		

Ed Riley; CA ISO	X		
Richard J. Kafka; Pepco	x		
A. Ralph Rufrano; NYPA	x		
Transmission Subcommittee	x		
George Bartlett; Entergy	x		
James Spearman / Florence Belser; PSC of SC	X		
John Horakh; MAAC	X		
Karl Kohlrus; City Water Light & Power	X		
William F. Pope; Gulf Power Company	X		
William J. Smith; Allegheny Power	X		
Tom Pruitt; Duke Power (3)	X		
Don Chandler; CenterPoint Energy (2)	X		
Guy Zito; NPCC-CP9 (10)	X		
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)	X		
Kathleen Goodman; ISO NE	X		
P. D. Henderson / Khaqan Khan; The IMO	X		
Patti Metro; FRCC (7)	x		

Rick Stegehuis; Wisconsin Electric	X		
Stuart Goza; TVA (2)	x		

13. Do you think the list is sufficient, or should each of the following topics have an associated list of elements that must be addressed?

Summary Consideration: There was no consensus on this topic. While most commenters indicated support for this list as presented, several commenters indicated a desire for additional details. In support of the commenters who want additional details, the SDT will either develop or recommend the development of a Technical Reference to support this requirement that includes suggestions for what could be included in each of the topics.

Commenters	Yes	No	Comments
Don Gold; BPA (6)			See 12. *(The minimum list includes topics that may not be required. If a minimum list is necessary it should be developed by the Region and/or the compliance monitor specifically for each RA. The minimum list includes topics that may not be required. If a minimum list is necessary it should be developed by the Region and/or the compliance monitor specifically for each RA.)*
If the list is developed by the Region, then that list would be considered a Regional requirement – not a NERC Standard. Compliance Monitors verify that NERC Reliability Standards are being followed – their job is not to establish the standards.			
Ed Riley; CA ISO	x	x	
Robert W Waldele; NYISO		x	Remove system restoration, add load forecast and unusual system conditions. There is adequate detail contained in the "Overview" at the beginning of this comment form. That should be considered for inclusion in the Standard.
System restoration was removed from the list. Load forecast and unusual system conditions could be topics addressed in the Procedure, Process or Plan for RA to RA communications and notifications.			
Joseph C. Fleury; NYSRC		x	We recommend to remove system restoration, and add load forecast, weather advisory, and unusual system conditions. There is adequate detail contained in the "Overview" at the beginning of this comment form. That should be considered for inclusion in the Standard.
System restoration was removed from the list. Load forecast, weather advisories and unusual system conditions could be topics addressed in the Procedure, Process or Plan for RA to RA communications and notifications.			
A. Ralph Rufrano; NYPA Kathleen Goodman; ISO NE		x	Add Weather advisory

System restoration was removed from the list. Load forecast, weather advisories and unusual system conditions could be topics addressed in the Procedure, Process or Plan for RA to RA communications and notifications.			
Alan Boesch; NPPD		x	The coordination and monitoring these items with BAs and TOPs should be included and added as measurements.
This standard has been limited in scope to the coordination between RAs. Adding the coordination and monitoring between BAs and TOPs is beyond the scope of the standard.			
Susan Morris; SERC		x	The first item in the list seems to provide sufficient detail. Other items in the list would benefit from further clarifications on expectations like the first item contains, such as exchange of planned or unplanned outage information. However, all items may not need this additional detail.
There was no consensus on whether to add more details to all of the topics on the list – the SDT will either develop or have developed a technical reference that provides more details for each of the topics on the list.			
Don Reichenbach; SERC Ops Plng Sub (8)		x	The first item in the list seems to provide sufficient detail. Other items in the list would benefit from further clarifications on expectations like the first item contains. However, all items may not need this additional detail.
There was no consensus on whether to add more details to all of the topics on the list – the SDT will either develop or have developed a technical reference that provides more details for each of the topics on the list.			
Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen		x	Except for the first activity.
There was no consensus on whether to add more details to all of the topics on the list – the SDT will either develop or have developed a technical reference that provides more details for each of the topics on the list.			
Guy Zito; NPCC-CP9 (10)		x	
James Spearman / Florence Belser; PSC of SC	x		The list is sufficient as long as all RA's understand all the elements the same way and develop their respective Operating Processes and Plans congruent with those of all other Ras.
Agree. However, there is no way to guarantee that all RAs will understand all elements the same way – no matter how much detail is provided.			

William J. Smith; Allegheny Power	x		Each group of Ras should be permitted to determine the specific information needed to be exchanged.
Agreed.			
Albert DiCaprio; PJM (4)	x		Any 'clarifying' statements will only cause more problems. Defining what must and must not be in a Conference Call will lead to a data exchange rather than an INFORMATION exchange. What is important one day may be a time-waster on another day.
Agreed.			
Don Chandler; CenterPoint Energy (2)	x		Provided they include all involved parties. –RTS
This standard has been limited in scope to the coordination between RAs. Adding the coordination and monitoring between BAs and TOPs is beyond the scope of the standard.			
Operating Reliability Working Group – Southwest Power Pool(9)	X		
Richard J. Kafka; Pepco	X		
Transmission Subcommittee	X		
George Bartlett; Entergy	X		
John Horakh; MAAC	X		
Karl Kohlrus; City Water Light & Power	X		
William F. Pope; Gulf Power Company	X		
Tom Pruitt; Duke Power (3)	X		
Gerald Rheault; Manitoba Hydro	X		
Karl Tammar ; ISO/RTO Council-	x		

Stds Rev Com (10)			
P. D. Henderson / Khaqan Khan; The IMO	X		
Patti Metro; FRCC (7)	X		
Rick Stegehuis; Wisconsin Electric	X		
Roger Champagne; Hydro Quebec	X		
Stuart Goza; TVA (2)	X		

14. Do you think the standard should require the RA to have a list of identified normal and emergency system conditions involving its RA Area that may affect interconnection reliability?

Summary Consideration: There was no consensus on this topic. The SDT was considering including the list to simplify the compliance monitoring process – but many commenters indicated this would be burdensome so it has not been added to the revised standard. Several commenters indicated that there wasn't a need to have a separate category of documents for identified normal and emergency system conditions – so this doesn't appear in the revised standard.

Commenters	Yes	No	Comments
Operating Reliability Working Group – Southwest Power Pool (9)		x	This requirement should be incorporated in the RA Certification Standard.
If you feel that it should be added to the RA Certification Standard we encourage you to submit this comment when that standard is posted.			
Richard J. Kafka; Pepco		x	Such a list would in all probability be incomplete and provide a false sense of security.
There was not enough support for this requirement to be added to the draft standard.			
Transmission Subcommittee		x	The subcommittee believes that the requirements are generic requirements. The details (list of identified normal and emergency system conditions) do not need to be included in the requirement.
There was not enough support for this requirement to be added to the draft standard.			
Susan Morris; SERC		x	Analyses of the real-time system are too dynamic to require a static list. However, operators should be cognizant of pre-identified weak points in the system in order to focus the operator on possible problem spots. We read the standard to say that the RA must have written procedures, processes, or plans that indicate what the operator must do if a situation occurs where interconnection reliability is or may be compromised. We do not read the standard to say that there are certain lists that must be a part of the processes, procedures, or plans. This would be prescribing the "how." This goes back to the comments listed in question 9: The Reliability Authorities should encourage operators to be engaged in the goal to achieve reliable operations. Please avoid trying to promote "cookbook type lists" to manage the very complex task of operating a reliable system.
This list wasn't intended to be dynamic, but was intended to be a list that could be developed as a result of system studies. The intent of the list			

was to simplify compliance monitoring process.			
Don Reichenbach; SERC Ops Plng Sub (8)		x	Analyses of the real-time system are too dynamic to require a static list. However, operators should be cognizant of pre-identified weak points in the system in order to focus the operator on possible problem spots. We read the standard to say that the RA must have written procedures, processes, or plans that indicate what the operator must do if a situation occurs where interconnection reliability is or may be compromised. We do not read the standard to say that there are certain lists that must be a part of the processes, procedures, or plans. This would be prescribing the "how."
This list wasn't intended to be dynamic, but was intended to be a list that could be developed as a result of system studies. The intent of the list was to simplify compliance monitoring process.			
Robert W Waldele; NYISO Joseph C. Fleury; NYSRC		x	It should be sufficient that each RA has a documented criteria for determining normal and emergency criteria contingencies and system conditions (states).
Agreed. There was not enough support for this requirement to be added to the draft standard.			
John Horakh; MAAC		x	Having such a list can lead to a false sense of security, if the RA assumes these are the only system conditions that affect reliability.
Agreed. There was not enough support for this requirement to be added to the draft standard.			
Alan Boesch; NPPD		x	I am not sure a "list" is required but it should certainly know the conditions and be able to respond to the conditions.
Agreed. There was not enough support for this requirement to be added to the draft standard.			
Albert DiCaprio; PJM (4)		x	Having lists do not ensure reliability. The idea that lists equate to reliability is incorrect. The list may be helpful, but in and of themselves the lists do nothing. NERC standards are compliance standards not checklists.
The intent of the list was to simplify compliance monitoring process. There was not enough support for this requirement to be added to the draft standard			
Don Gold; BPA (6)		x	It seems inappropriate for NERC to require a list. NERC should be more interested in everyone knowing and doing in order to maintain a reliable system.
The intent of the list was to simplify compliance monitoring process. There was not enough support for this requirement to be added to the draft			

standard			
Roman Carter; Southern Co Gen		x	Analyses of real-time system are too dynamic to require a static list.
This list wasn't intended to be dynamic, but was intended to be a list that could be developed as a result of system studies. The intent of the list was to simplify compliance monitoring process.			
A. Ralph Rufrano; NYPA		x	
George Bartlett; Entergy		x	
Guy Zito; NPCC-CP9 (10)		x	
Roger Champagne; Hydro Quebec		x	
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)		X	
Kathleen Goodman; ISO NE		X	
Stuart Goza; TVA (2)	x		This "list" is dynamic and may change upon each execution of real-time security analysis.
This list wasn't intended to be dynamic, but was intended to be a list that could be developed as a result of system studies. The intent of the list was to simplify compliance monitoring process.			
Marc Butts; Southern Co Svcs (10)	x		Looks as though a standard critical contingencies list is going to be required in a number of different areas. We suspect it will simplify communications if everyone can refer to a pre-defined contingency number in most situations. Flexibility should still be allowed for those contingencies that no one has identified in advance, of course. We realize that the real-time system analysis makes a 'static-list' only a reference list and would not include every contingency.
This list wasn't intended to be dynamic, but was intended to be a list that could be developed as a result of system studies. The intent of the list was to simplify compliance monitoring process.			
Ed Riley; CA ISO	x		The requirement needs to indicate identified "known" normal and emergency system conditions.
There were several suggestions that this topic in requirement 101 was redundant, and it has been removed from the standard.			
P. D. Henderson / Khaqan Khan; The IMO	x		

Patti Metro; FRCC (7)	X		
Rick Stegehuis; Wisconsin Electric	X		
Karl Kohlrus; City Water Light & Power	X		
William F. Pope; Gulf Power Company	X		
William J. Smith; Allegheny Power	X		
Tom Pruitt; Duke Power (3)	X		
James Spearman / Florence Belser; PSC of SC	X		
Blaine Keener; PSC of MD	X		
Don Chandler; CenterPoint Energy (2)	X		
Gerald Rheault; Manitoba Hydro	X		

15. Do you feel that the standard should require the RA to have a Document Change Control Procedure or do you think this requirement is delving too far into 'how' an RA meets the objective of maintaining its procedures?

Summary Consideration: There was no consensus on the inclusion of this requirement, and it has been dropped from the standard. Because many commenters did think this was a good idea and the SAR requires the RAs to maintain their procedures, the SDT has added language to require that Operating Processes, Procedures and Plans be reviewed at least annually, and also requires that each Process, Procedure or Plan addressed in this standard, include a version control number or date, and a distribution list,. The revised standard does not include a requirement to have a document change procedure. The SDT will either develop or have developed a technical reference that includes a sample document change control procedure.

Commenters	OK	Too Detailed	Comments
Albert DiCaprio; PJM (4)		x	A document control procedure is not a replacement for trained operators who know what to do whether or not a copy of some procedure has the correct date on it. Good practices are not supposed to be part of a NERC Standard. Having the 'latest' procedure does not replace having the 'right' procedure. As written this standard only focuses on having the latest procedure.
Most commenters agreed with you and it has been dropped from the standard.			
Don Gold; BPA (6)		x	Same as 14. The results are the important thing, not how the results are obtained.
Most commenters agreed with you and this has been dropped from the standard.			
Peter Burke; ATC		x	
Transmission Subcommittee (17)		X	
George Bartlett; Entergy		X	
Alan Boesch; NPPD		X	
Joseph C. Fleury; NYSRC		X	
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)		X	
Patti Metro; FRCC (7)		X	

Robert W Waldele; NYISO		X	
Roger Champagne; Hydro Quebec		X	
Susan Morris; SERC	X		The document change control procedure should include a review process for the Operating 3 P's.
Most commenters disagreed with the addition of the document change control procedure, and it has been removed from the revised standard. The SDT revised the standard to indicate that each of the Procedures, Processes or Plans should be reviewed (and updated if needed) at least once every three years.			
Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen	X		We would say it is critical to make sure everyone is actually talking about the same thing at the same time.
Having a document change control procedure doesn't guarantee that everyone will have the same document at the same time. To ensure that old copies of outdated documents are destroyed takes a diligent effort on many parts.			
P. D. Henderson / Khaqan Khan; The IMO	x		It is expected that there shall be a mutual agreement between RA's on the timelines for submission of revised documents, i.e. weekly, monthly …
Most commenters disagreed with the addition of the document change control procedure, and it has been removed from the revised standard.			
Karl Kohlrus; City Water Light & Power	x		Maybe there should be a reference document or appendix that describes these procedures in more detail with examples.
Most commenters disagreed with the addition of the document change control procedure, and it has been removed from the revised standard. The SDT will either develop or have developed a technical reference that includes a sample document change control procedure.			
Operating Reliability Working Group – Southwest Power Pool	X		
Richard J. Kafka; Pepco	X		
Ed Riley; CA ISO	X		
James Spearman / Florence Belser; PSC of SC	X		
John Horakh; MAAC	x		

William F. Pope; Gulf Power Company	X		
William J. Smith; Allegheny Power	X		
Tom Pruitt; Duke Power (3)	X		
Blaine Keener; PSC of MD	X		
Don Chandler; CenterPoint Energy (2)	X		
Don Reichenbach; SERC Ops Plng Sub (8)	X		
Gerald Rheault; Manitoba Hydro	X		
Kathleen Goodman; ISO NE	X		
Rick Stegehuis; Wisconsin Electric	X		
Stuart Goza; TVA (2)	X		

16. If you feel that the standard should require the RA to have a Document Change Control Procedure, do you think this standard should include a list of elements that must be included in that procedure?

Summary Consideration: Most commenters were not in favor of including the requirement for a document change control procedure in this standard, so it has been removed.

Commenter	Yes	No	N/A	Comments
A. Ralph Rufrano; NYPA Guy Zito; NPCC-CP9 (10)				I think this, though it may be a good idea, is out-of-scope of this Standard.
Most of the commenters agreed with you.				
George Bartlett; Entergy	x			Including such a list would provide consistency between RA's.
Most industry commenters did not support the inclusion of a requirement to have a document change control procedure, so it has been removed from the revised standard.				
Rick Stegehuis; Wisconsin Electric	X			
John Horakh; MAAC	X			
Karl Kohlrus; City Water Light & Power	X			
Tom Pruitt; Duke Power (3)	X			
Blaine Keener; PSC of MD	X			
Kathleen Goodman; ISO NE	X			
P. D. Henderson / Khaqan Khan; The IMO	X			
Ed Riley; CA ISO	X			
Stuart Goza; TVA (2)	X			
Richard J. Kafka; Pepco		x		Document Change Control should be obvious to RAs

Most industry commenters did not support the inclusion of a requirement to have a document change control procedure, so it has been removed from the revised standard.				
Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen		 x		 We suggest a recommended or suggested list instead
Most industry commenters did not support the inclusion of a requirement to have a document change control procedure, so it has been removed from the revised standard.				
Susan Morris; SERC		x		However, Reliability Authorities should be encouraged to work together to promote consistency among their respective procedures. If an RA fails to develop an adequate document change control procedure, then this should be flagged either through the yearly self-certifications, audits, or by reports from neighboring RA(s).
Most industry commenters did not support the inclusion of a requirement to have a document change control procedure, so it has been removed from the revised standard. The revised standard ensures that, for situations where RAs need to work together, the RAs that need to work together must 'agree to' the actions identified in the associated Procedures, Processes or Plans. Self-certification does include identifying those documents that include notifications and other actions to be taken in coordination with other RAs.				
ORWG – Southwest Power Pool (9)		x		
James Spearman / Florence Belser; PSC of SC		x		
William J. Smith; Allegheny Power		x		
Don Reichenbach; SERC Ops Plng Sub (8)		x		
Gerald Rheault; Manitoba Hydro		x		
Joseph C. Fleury; NYSRC Robert W Waldele; NYISO			x	Compliance should be measured by the result, rather than the means.
Most industry commenters did not support the inclusion of a requirement to have a document change control procedure, so it has been removed from the revised standard.				
Peter Burke; ATC			x	

Transmission Subcommittee			X	
William F. Pope; Gulf Power Company			X	
Alan Boesch; NPPD			X	
Albert DiCaprio; PJM (4)			X	
Don Chandler; CenterPoint Energy (2)			X	
Don Gold; BPA (6)			X	
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)			X	
Patti Metro; FRCC (7)			X	
Roger Champagne; Hydro Quebec			X	

17. If you feel that there should be a list of elements required in a Document Change Control Procedure, please check all of the elements you feel should be required:

Summary Consideration: Most commenters were not in favor of including the requirement for a document change control procedure in this standard, so it has been removed. The SDT will either develop or have developed a technical reference with a sample document change control procedure, and will use the comments provided in response to this question to determine which elements to include in that sample procedure. This summary consideration should be considered a response to all of the comments submitted in response to this question. The standard has been revised to require that each of the Operating Processes, Procedures or Plans be reviewed at least once every three years, and that each of these documents include version control number or date, and a distribution list.

Commenters	Rev Cycle 10	Dist Method 6	Summary of Changes 10	Version Control 9	Other 3	N/A 13	Comments
George Bartlett; Entergy	1	1	1	1			Entergy does not support that RA should be required to have a Document Control Procedure, in case the standard includes this requirement, the standard should include elements checked above.
Most commenters did not support this requirement, and it has been removed from the revised standard.							
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10) Kathleen Goodman; ISO NE	10	10	10	10	10	10	
Don Chandler; CenterPoint Energy (2) Stuart Goza; TVA (2)	1	1	1	1			
Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen	3		3	3	3		Verification of receipt of changes This may serve as the “recommended list”.
Most commenters did not support this requirement, and it has been removed from the revised standard.							
P. D. Henderson / Khaqan Khan; The IMO		1	1	1	1		A signature page should also be a requirement.

Most commenters did not support this requirement, and it has been removed from the revised standard. The standard does require that there be some evidence that the entities required to act as part of a Procedure, Process or Plan, have agreed to take the actions within that document. This should serve the same purpose as the 'signature' page.							
Ed Riley; CA ISO	1	1		1			
Karl Kohlrus; City Water Light & Power	1	1	1				Date of last revised; distribution list.
Most commenters did not support this requirement, and it has been removed from the revised standard. The SDT revised the standard to indicate that each of the Procedures, Processes and Plans addressed in Requirement 101 include a version number or approval date and a distribution list.							
Robert W Waldele; NYISO Joseph C. Fleury; NYSRC	1		1	1			These should be listed as generalized guidelines rather than a rigorous procedure.
Most commenters did not support this requirement, and it has been removed from the revised standard.							
William F. Pope; Gulf Power Company	1		1	1			
Rick Stegehuis; Wisconsin Electric			1	1			
John Horakh; MAAC	1		1				
Blaine Keener; PSC of MD	1						
James Spearman / Florence Belser; PSC of SC						1	Although all the criteria listed above are essential elements of an effective Document Change Control Process.
Most commenters did not support this requirement, and it has been removed from the revised standard.							

Susan Morris; SERC						x	The following should be sufficient in promoting a list of elements in the document change control procedure: 101 (d) Compliance Monitoring Process, Item (6)(iv) as follows: Evidence that its Operating Procedures, Processes or Plans were approved, updated, distributed and reviewed in accordance with its Document Change Control Procedure.
Most commenters did not support this requirement, and it has been removed from the revised standard. The standard was revised to indicate that the Procedures, Processes and Plans addressed in Requirement 101 have evidence that the RA's with actions in those documents have agreed to the actions identified, and evidence that the Procedures, Processes and Plans were distributed to the RAs that are identified as having actions. The same requirement now includes language indicating that the Procedures Processes and Plans have a version control number or approval date, and a distribution list.							
Peter Burke; ATC						x	
Alan Boesch; NPPD						x	
William J. Smith; Allegheny Power						x	
Don Gold; BPA (6)						x	
Don Reichenbach; SERC Ops Plng Sub (8)						x	
Gerald Rheault; Manitoba Hydro						X	
Operating Reliability Working Group – Southwest Power Pool						X	
Richard J. Kafka; Pepco						X	
Patti Metro; FRCC (7)						X	
Roger Champagne; Hydro Quebec						x	

18. If you feel that the standard should require the RA to have a Document Change Control Procedure, do you think there should be a measure that the RA have evidence it followed its Document Change Control Procedure?

Summary Consideration: Most commenters were not in favor of including the requirement for a document change control procedure in this standard, so it has been removed. The standard has been revised to require that each of the Operating Processes, Procedures or Plans addressed in this requirement be reviewed at least once every three years and include a version control number or date, and a distribution list,

Commenters	Yes	No	N/A	Comments
George Bartlett; Entergy	x			Entergy does not support that RA should be required to have a Document Control Procedure, in case the standard includes this requirement, the standard should include a measure that that RA has evidence that it followed its Document Change Control Procedure.
Most commenters were not in favor of including the requirement for a document change control procedure in this standard, so it has been removed.				
OPWG – Southwest Power Pool (9)	X			
Richard J. Kafka; Pepco	X			
James Spearman / Florence Belser; PSC of SC	X			
John Horakh; MAAC	X			
William F. Pope; Gulf Power Company	X			
William J. Smith; Allegheny Power	X			
Tom Pruitt; Duke Power (3)	X			
Karl Kohlrus; City Water Light & Power		X		
Joseph C. Fleury; NYSRC Robert W Waldele; NYISO			x	An RA does not need a DCCP; it only needs to have adequate means to assure revision control and distribution.
Most commenters were not in favor of including the requirement for a document change control procedure in this standard, so it has been				

removed.				
Alan Boesch; NPPD			X	
Don Gold; BPA (6)			X	
Transmission Subcommittee			X	
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)			X	
Patti Metro; FRCC (7)			X	
Roger Champagne; Hydro Quebec			X	
Blaine Keener; PSC of MD	X			
Don Chandler; CenterPoint Energy (2)	X			
Don Reichenbach; SERC Ops Plng Sub (8)	X			
Gerald Rheault; Manitoba Hydro	X			
Kathleen Goodman; ISO NE	X			
Marc Butts; Southern Co Svcs (10)	X			
Roman Carter; Southern Co Gen	X			
P. D. Henderson / Khaqan Khan; The IMO	X			
Rick Stegehuis; Wisconsin Electric	X			
Stuart Goza; TVA (2)	X			
Susan Morris; SERC	x			

19. The proposed standard requires the RA to participate in 'agreed upon' conference calls or other communication forums with other RAs. Should this requirement be more stringent and require that each RA participate in a daily conference call with adjacent RAs? (Note that most RAs have several adjacent RAs, unless all RAs in an interconnection were on a single call, most RAs would be required to participate in several conference calls each day.)

Summary Consideration: The responses to this question showed that the original question was poorly worded and misunderstood by the commenters. There was a typographical error in the standard that was posted. The standard should have included the requirement that RAs participate in 'agreed upon' calls – and instead the posted version of the standard included the requirement that RAs participate in 'daily agreed upon calls'. The SDT was trying to ask if leaving the frequency of calls up to the involved RAs was too vague and suggested 'daily' calls as an alternative.

Although the question wasn't clear, most commenters indicated that RAs should decide amongst themselves how often to hold conference calls. There was a concern stated in the comments that if there is no minimum frequency specified, the frequency may drop to nill. The intent of these calls is two-fold – to ensure that RAs have practiced contacting one another and have an established working relationship with one another before they are called upon to work together to resolve some operating emergency – and second to ensure that there is an exchange of information that provides all RAs with improved 'situational awareness' of the conditions in existence beyond a single RA's boundaries. This situational awareness can be critical when the unexpected occurs.

In response to the industry's comments, the SDT revised the requirement to allow RAs to determine when to have calls, but set the minimum frequency at once per week. The SDT will ask the industry for feedback on the appropriateness of this modification. Please see a more complete justification for this revision at the end of this document.

Commenters	Agreed Calls	Adjacent RAs	Comments
Transmission Subcommittee (17)			RAs only need to have conference calls on an "as needed" basis.
The intent of these calls is partially to ensure that RAs have situational awareness of the operating conditions beyond the RA's own boundaries. While daily calls aren't always necessary, several commenters suggested a minimum frequency be established, and it seems that these calls should take place at least once a week to ensure that RAs maintain that situational awareness.			
Don Gold; BPA (6)			The RA should communicate. How the communication is accomplished should be immaterial to NERC.
The intent of these calls is partially to ensure that RAs have situational awareness of the operating conditions beyond the RA's own boundaries. While daily calls aren't always necessary, several commenters suggested a minimum frequency be established, and it seems that these calls should take place at least once a week to ensure that RAs maintain that situational awareness.			
Patti Metro; FRCC (7)			This question is confusing. The requirement states "agreed upon daily

			conference call". Doesn't that mean everyday?
There was a typographical error in the version of the standard that was posted. The posted version indicated that calls were required on a daily basis and should have only included a requirement that RAs participate in 'agreed upon' calls.			
Ed Riley; CA ISO	x	X	
Richard J. Kafka; Pepco	x		Routine email contact should be sufficient for RAs to arrange needed conference calls. Daily conference calls could lead to complacency.
The intent of these calls is to partially to ensure that RAs have situational awareness of the operating conditions beyond the RA's own boundaries. While daily calls aren't always necessary, several commenters suggested a minimum frequency be established, and it seems that these calls should take place at least once a week to ensure that RAs maintain that situational awareness.			
Robert W Waldele; NYISO Joseph C. Fleury; NYSRC	x		Daily calls are unnecessarily time consuming and may be counter-productive. RAs should have conference calls on an "as needed" basis.
The intent of these calls is to partially to ensure that RAs have situational awareness of the operating conditions beyond the RA's own boundaries. While daily calls aren't always necessary, several commenters suggested a minimum frequency be established, and it seems that these calls should take place at least once a week to ensure that RAs maintain that situational awareness.			
Gerald Rheault; Manitoba Hydro	x		The RAs should decide among themselves how frequently they have to participate in conference calls to exchange information. Requirements may vary from Region to Region and depending on the complexity of the system being operated.
The intent of these calls is to partially to ensure that RAs have situational awareness of the operating conditions beyond the RA's own boundaries. While daily calls aren't always necessary, several commenters suggested a minimum frequency be established, and itsseems that these calls should take place at least once a week to ensure that RAs maintain that situational awareness.			
Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen	x		Not sure what the proper periodicity is, but do think that "required" calls are needed. We are concerned that the "agreed upon" calls will fade away to zero during periods with no troubles and the skills needed to get everyone together and communicate effectively during a crisis will not be developed or maintained so that they will be available when needed.
This was also a concern voiced by several members of the SDT. The intent of these calls is to partially to ensure that RAs have situational awareness of the operating conditions beyond the RA's own			

boundaries. While daily calls aren't always necessary, several commenters suggested a minimum frequency be established, and itsseems that these calls should take place at least once a week to ensure that RAs maintain that situational awareness.			
ORWG – Southwest Power Pool (9)	x		
Peter Burke; ATC	X		
Albert DiCaprio; PJM (4)	X		
Don Chandler; CenterPoint Energy (2)	X		
Don Reichenbach; SERC Ops Plng Sub (8)	X		
George Bartlett; Entergy	X		
James Spearman / Florence Belser; PSC of SC	X		
John Horakh; MAAC	X		
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)	X		
P. D. Henderson / Khaqan Khan; The IMO	X		
Rick Stegehuis; Wisconsin Electric	X		
Roger Champagne; Hydro Quebec	X		
Susan Morris; SERC	x		
Karl Kohlrus; City Water Light & Power		x	Several RAs could conference together simultaneously reducing the number of calls.
SDT Agrees with this concept,, "Agreed Upon" conference calls should reflect this.			

Alan Boesch; NPPD		x	"The RA should be required to call adjacent Ras as required by system conditions" - : I hope you do not mind that I changed the wording in the choice of answers. The requirement to participate in daily conference calls is a good industry practice and should be encouraged. I do not believe a RA should be fined for failure to participate in daily conference calls. He should be required to communicate with his neighboring RA's when required by system conditions. It might be a good idea to require joint emergency response training secessions. There is nothing like a little face to face contact to get to know your neighbor and feel comfortable with him when there is a problem on the system.
While the concept is sound, it would be very difficult to measure compliance with a requirement that requires performance based on a subjective statement such as 'as required by system conditions'. Every RA may have a different interpretation of what this means.			
Blaine Keener; PSC of MD		x	The RA should be required to initiate a conference call with other RA's with whom a coordination issue has been identified. The other RA's shall participate in the call.
Coordination of actions when RAs need to work together to resolve an operating situation is addressed in Requirement 103. Requirement 102 was intended to ensure that on some periodic basis, RAs share information with one another. The information to be shared under Requirement 102 would not necessarily require the involved RAs to take some action. In most cases the information shared under Requirement 102 is meant to provide the involved RAs with 'situational awareness' so they are all in the best position possible to take appropriate actions if the unexpected conditions occurs.			
Stuart Goza; TVA (2)		X	
William F. Pope; Gulf Power Company		X	
William J. Smith; Allegheny Power		X	
Kathleen Goodman; ISO NE		x	

20. If you feel that the RA should be required to participate in daily conference calls with its adjacent RAs, what do you recommend as an appropriate method of measuring compliance with this requirement?

Summary Consideration: The draft standard included using logs as a method of documenting notifications, and several commenters indicated this would also be a good method of documenting conference calls. Several suggestions were provided for measuring compliance, including automatic logs and manual logs.

Commenters	Suggestions	N/A
Marc Butts; Southern Co Svcs (10)	Log participation (preferably automatically) and set up compliance requirements that call for compliance. We're not convinced it should be daily but something frequent is good.	
Most commenters indicated calls should not be required to be held daily – and the SDT has revised the standard to indicate that "The frequency of these conference calls shall be agreed upon by all involved Reliability Authorities and shall be at least weekly		
Roman Carter; Southern Co Gen	Log participation (preferably automatically) and set up compliance requirements that call for a high level of participation (90% or above on a monthly basis) to avoid non-compliance. I'm not convinced it should be daily but something frequent is good.	
Most commenters indicated calls should not be required to be held daily – and the SDT has revised the standard to indicate that "The frequency of these conference calls shall be agreed upon by all involved Reliability Authorities and shall be at least weekly		
A. Ralph Rufrano; NYPA Guy Zito; NPCC-CP9 (10) Kathleen Goodman; ISO NE Rick Stegehuis; Wisconsin Electric	Perhaps require use of a conferencing center that does a role call and monitors participation.	
This is a good idea. If endorsed, it would require that the calls be used with a system that was available to all RAs.		
Stuart Goza; TVA (2)	Documentation in daily log of participation.	
This isn't currently required in the standard because the person that participates in the call isn't necessarily the same person working an operating desk – and there may not be an operating log for the person that participates in the call. However the standard could be revised to require a log be kept of participation in the calls.		
George Bartlett; Entergy	Operator log indicating that RA participated in the daily conference call.	

This isn't currently required in the standard because the person that participates in the call isn't necessarily the same person working an operating desk – and there may not be an operating log for the person that participates in the call. However the standard could be revised to require a log be kept of participation in the calls.		
Karl Kohlrus; City Water Light & Power	This should be self-policing as a NERC representative should participate in at least some of these calls.	
It isn't clear what role NERC would be playing in these calls. The purpose of the calls is to exchange information between RAs.		
William J. Smith; Allegheny Power	Compliance Monitors should check attendance reports maintained by each RA.	
This is a good idea, but the standard doesn't require attendance reports.		
Patti Metro; FRCC (7)	The standard is already written with levels to include % participation in daily conference calls.	X
Yes – but as written any evidence is considered acceptable. The SDT wanted to know if anyone had ideas about what that evidence looks like so that this part of the standard could be revised to be more specific.		
John Horakh; MAAC		x
Transmission Subcommittee		x
James Spearman / Florence Belser; PSC of SC		x
William F. Pope; Gulf Power Company		x
P. D. Henderson / Khaqan Khan; The IMO		x
Joseph C. Fleury; NYSRC		x
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)		x
Susan Morris; SERC		X
Robert W Waldele; NYISO		X

Operating Reliability Working Group – Southwest Power Pool		x
Richard J. Kafka; Pepco		X
Alan Boesch; NPPD		X
Albert DiCaprio; PJM (4)		X
Blaine Keener; PSC of MD		X
Don Chandler; CenterPoint Energy (2)		X
Don Gold; BPA (6)		X
Don Reichenbach; SERC Ops Plng Sub (8)		X
Gerald Rheault; Manitoba Hydro		X

21. If you feel that the RA should be required to participate in a daily conference call with its adjacent RAs, how many RAs should participate in the call – should there be a single call with all RAs within an Interconnection or should there be smaller groups of RAs that participate in a daily call?

Summary Consideration: Most industry commenters indicated that daily conference calls shouldn't be mandated, and this requirement hasn't been added to the standard. In other questions, commenters indicated there should be a method used for these calls that is common to all RAs in an Interconnection.

Commenters	All RAs on 1 Call	Other	N/A	Comments
A. Ralph Rufrano; NYPA Kathleen Goodman; ISO NE Guy Zito; NPCC-CP9 (10)				Should leave this decision up to the individual RAs
Agreed. Most commenters indicated that calls shouldn't be required on a daily basis. The standard has been revised to require calls be conducted at least once a week.				
Karl Kohlrus; City Water Light & Power	x	X		Either way has advantages and disadvantages, experience will show the best way. It may be good to have one Interconnection-wide call and other calls with subsets of RAs.
Agreed. Industry commenters have indicated that daily calls shouldn't be mandated, but that there should be some minimum periodicity for the calls. The standard has been revised to require calls be conducted at least once a week.				
George Bartlett; Entergy	X			
Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen	x			Probably need to set up regional or supra-regional groups also with longer periodicity and, perhaps, lower priority.
Agreed. The standard has been revised to require calls be conducted at least once a week.				
Patti Metro; FRCC (7)	x			
Stuart Goza; TVA (2)	x			
William J. Smith; Allegheny Power		x		Calls should be held in groups that share critical interfaces.

This may be applicable for some situations but not for all situations. Some calls may address issues that are interconnection-wide.				
Ed Riley; CA ISO		x		Adjacent RA's need to communicate with each other on a regular daily basis.
While this is a good practice there wasn't enough support to include this requirement in the standard. However, if they agree to that on daily basis they can do so.				
James Spearman / Florence Belser; PSC of SC			x	However, if daily conference call participation is mandated, one call involving all RAs is preferable to multiple calls involving subsets of RAs.
There wasn't enough support for daily calls to include that requirement in this standard.				
Operating Reliability Working Group – Southwest Power Pool (9)			X	
Richard J. Kafka; Pepco			X	
Transmission Subcommittee			X	
John Horakh; MAAC			X	
William F. Pope; Gulf Power Company			X	
Alan Boesch; NPPD			X	
Albert DiCaprio; PJM (4)			X	
Don Chandler; CenterPoint Energy (2)			X	
Don Gold; BPA (6)			X	
Don Reichenbach; SERC Ops Plng Sub (8)			X	
Gerald Rheault; Manitoba Hydro			X	
Joseph C. Fleury; NYSRC			X	

Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)			X	
P. D. Henderson / Khaqan Khan; The IMO			X	
Rick Stegehuis; Wisconsin Electric			X	
Roger Champagne; Hydro Quebec			X	
Susan Morris; SERC			X	
Robert W Waldele; NYISO			X	

22. If you think there should be a requirement that each RA participate in a daily conference call with its adjacent RAs, what position should participate in the call – should the call be limited to system operators, or should each RA determine what position should participate in the daily call.

Summary Consideration: Most commenters indicated that this should be left up to each RA – so this will not be specified in the standard.

Commenters	Limit to SOs	No Limits	N/A	Comments
Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen	 x			24 x 7 people so that skill set will be available any time needed, day or night
Most commenters indicated that each RA should make this decision and this will not be specified in the standard.				
Ed Riley; CA ISO	x			
George Bartlett; Entergy		X		
Karl Kohlrus; City Water Light & Power		X		
William J. Smith; Allegheny Power		X		
Kathleen Goodman; ISO NE		X		
Patti Metro; FRCC (7)		X		
Stuart Goza; TVA (2)		x		
Operating Reliability Working Group – Southwest Power Pool			X	
Richard J. Kafka; Pepco			X	
Transmission Subcommittee			X	
James Spearman / Florence Belser; PSC of SC			x	

John Horakh; MAAC			X	
William F. Pope; Gulf Power Company			X	
Alan Boesch; NPPD			X	
Albert DiCaprio; PJM (4)			X	
Don Chandler; CenterPoint Energy (2)			X	
Don Gold; BPA (6)			X	
Don Reichenbach; SERC Ops Plng Sub (8)			X	
Gerald Rheault; Manitoba Hydro			X	
Joseph C. Fleury; NYSRC			X	
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)			X	
P. D. Henderson / Khaqan Khan; The IMO			X	
Rick Stegehuis; Wisconsin Electric			X	
Roger Champagne; Hydro Quebec			X	
Susan Morris; SERC			X	
Robert W Waldele; NYISO			X	

23. Should this standard include a requirement that all the RAs in an interconnection have an agreed-to method for RAs to communicate with one another across their interconnection?

Summary Consideration: Most industry commenters indicated there should be an agreed-to method for RAs to communicate with one another across their interconnection. Commenters did not all interpret the question the same way – some commenters responded to the question as though it were asking if there should be a common 'tool' used throughout an interconnection – other commenters responded to the question as though it were asking if there should be a common 'process' used throughout an interconnection. While both questions are valid, each RA should have the 'tool' as one of the requirements for RA Certification. The SDT wanted to know if there should be a common procedure for communication between RAs across an interconnection.

Commenters	Yes	No	Comments
Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen		x	NERC hotline should suffice
The SDT wanted to know if there should be a common procedure for communication between RAs across an interconnection and not common tool.			
John Horakh; MAAC		x	Too much "how"
Agreed.			
Rick Stegehuis; Wisconsin Electric		x	This is implicit in the other requirements.
Agreed.			
Karl Kohlrus; City Water Light & Power		x	
Operating Reliability Working Group – Southwest Power Pool		x	
Susan Morris; SERC	x		The standard should require a dedicated "Primary" method of communications is necessary and a dedicated back-up "Secondary" method of communications is necessary. The actual communications systems do not need to be spelled out in the standard.
Agreed, SDT is not including any communication system in the Standard.			

Transmission Subcommittee	x		The subcommittee believes the standard should require a dedicated "Primary" method of communications is necessary and a dedicated back-up "Secondary" method of communications is necessary. The actual communications systems do not need to be spelled out in the standard.
Agreed, SDT is not including any communication system in the Standard			
James Spearman / Florence Belser; PSC of SC	x		The PSCSC believes it is important to establish a standard process for routine as well as emergency communications. "The way you practice is the way you play."
Agreed, SDT is not including any communication system in the Standard			
William J. Smith; Allegheny Power	x		RAs in an interconnection should have an agreed upon agenda and means of communication.
Agreed, SDT is not including any communication system in the Standard			
Alan Boesch; NPPD	x		RAs should be able to communicate with all adjacent RA's. Even those within another interconnection (if they are connected by a DC tie). When transactions cross interconnection boundaries coordination of changes of the transaction will require communication of the adjacent RA. An example would be the TLR process that is used today on the Eastern Interconnection and not on the Western Interconnection. The RA on the East side needs to communicate with the RA on the West side to coordinate reliability changes in transactions.
Agreed, SDT is not including any communication system in the Standard			
Albert DiCaprio; PJM (4)	x		The SDT has proposed too many "how tos" in the above questions. The proposals have entered into the area of ideal vs. pragmatic. Having communication methodologies is a good idea. It also should be in the CERTIFICATION requirements rather than in this standard
Agreed, SDT is not including any communication system in the Standard			
Joseph C. Fleury; NYSRC	x		This is OK provided that the requirements lead to an excessive number of routine conference calls involving too many participants, rather than having the necessary parties communicating at the appropriate time(s). The Standard should not require conference calls just for the sake of having them.
Agreed, Standard requires participation in the agreed upon conference call. SDT wanted to seek in put from Industry regarding the process of			

conference call.			
P. D. Henderson / Khaqan Khan; The IMO	x		An effective use of proper communication protocols such as where using "the current NERC hotline" shall be useful.
Agreed, SDT is not including any communication system in the Standard			
Robert W Waldele; NYISO	x		Provided that the requirements lead to an excessive number of routine conference calls involving too many participants, rather than having the necessary parties communicating at the appropriate time(s). The standard should not require conference calls just for the sake of having conference calls.
Agreed, Standard requires participation in the agreed upon conference call. SDT wanted to seek in put from Industry regarding the process of conference call.			
Ed Riley; CA ISO	X		
Richard J. Kafka; Pepco	X		
A. Ralph Rufrano; NYPA	X		
George Bartlett; Entergy	X		
William F. Pope; Gulf Power Company	X		
Blaine Keener; PSC of MD	X		
Don Chandler; CenterPoint Energy (2)	X		
Don Gold; BPA (6)	X		
Don Reichenbach; SERC Ops Plng Sub (8)	X		
Gerald Rheault; Manitoba Hydro	X		
Guy Zito; NPCC-CP9 (10)	X		
Karl Tammar ; ISO/RTO Council-Stds Rev	x		

Com (10)			
Kathleen Goodman; ISO NE	X		
Patti Metro; FRCC (7)	X		
Roger Champagne; Hydro Quebec	X		
Stuart Goza; TVA (2)	X		

24. Do you agree with the requirement to Coordinate Operations?

Summary Consideration: Most industry commenters supported the requirement as proposed. The SDT did make some minor modifications to conform with the language in newly approved Operating Policies. When there is a disagreement on the problem involved entities are required to operate as though the problem exists until there is agreement on the problem. When there is disagreement on the solution to a problem, the entities involved are required to operate to the most conservative solution to the problem. The SDT will ask the industry for confirmation that this approach is correct.

Commenters	Yes	No	Comments
Robert W Waldele; NYISO Joseph C. Fleury; NYSRC		x	When a "conflict" arises, the time required to study should not compromise the ability of the RA experiencing the problem from taking the necessary action(s) to resolve the problem and avoid further adverse impact on system reliability.
Agreed. The requirement includes the following: Each RA shall re-evaluate conflicting system status or studies. If time permits, this should be done before taking corrective actions. The above statement should make it clear that each RA must re-evaluate its system status as soon as possible – but if that RA is involved in critical actions, the re-evaluation may be delayed but must be completed.			
Alan Boesch; NPPD		x	If the RAs cannot agree what action to take they shall jointly take the most conservative action immediately. They can make adjustments later. Note: This was an identified problem during the August 14th, 2003 blackout. Ø It is just as important for the RA to coordinate with the BAs, IAs and TOPs in its reliability area and it should be added to this standard.
This suggestion has been adopted and is reflected in the revised standard. Agreed that it is important for the RAs to coordinate actions within their own RA Area – but that is outside the scope of this standard.			
Albert DiCaprio; PJM (4)	x		In requirement 103 (a) (1) (i) B – the term "affected Reliability Authorities" has been added. This term is too vague. As written all RAs in an interconnection can be "affected" by every procedure. Dropping the term "affected" does not alter the objective but does alter the scope of the requirement.
The requirement has been changed and the term, 'affected RAs' is not used.			

Don Chandler; CenterPoint Energy (2)	x		Coordinate operations should be that with all operating entities. –RTS
Agreed that it is important for the RAs to coordinate actions within their own RA Area – but that is outside the scope of this standard.			
Roger Champagne; Hydro Quebec	x		Could you elaborate on how or through which Standards the RA would identify scenarios "that could have adverse impact on another RA Area". If the "Prepare for and Respond to Abnormal or Emergency Conditions (STD 1000)" is to permit action without notification in case of extreme emergency, shouldn't this standard have a provision for that situation?
The NERC OC requires that each Region have a Regional Reliability Plan. Each of these Regional Reliability Plans identifies a list of operating scenarios that impact more than one control area. For example, the NPCC Regional Reliability Plan includes a section called, 'Description of Types of Operating Problems.' Each of these 'operating problems' has an associated set of instructions for preventing or resolving that problem. At this point, the SAR for Standard 1000 has only been posted once, and contains just a Brief Description. It isn't clear how broad or narrow a scope will be contained in that standard.			
ORWG – Southwest Power Pool (9)	X		
A. Ralph Rufrano; NYPA	X		
Peter Burke; ATC	X		
Roman Carter; Southern Co Gen	X		
Ed Riley; CA ISO	X		
Transmission Subcommittee	X		
George Bartlett; Entergy	X		
James Spearman / Florence Belser; PSC of SC	X		
John Horakh; MAAC	X		
Karl Kohlrus; City Water Light & Power	X		
William F. Pope; Gulf Power Company	X		

William J. Smith; Allegheny Power	X		
Tom Pruitt; Duke Power (3)	X		
Blaine Keener; PSC of MD	X		
Don Reichenbach; SERC Ops Plng Sub (8)	X		
Gerald Rheault; Manitoba Hydro	X		
Guy Zito; NPCC-CP9 (10)	X		
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)	X		
Kathleen Goodman; ISO NE	X		
Marc Butts; Southern Co Svcs (10)	X		
P. D. Henderson / Khaqan Khan; The IMO	X		
Patti Metro; FRCC (7)	X		
Rick Stegehuis; Wisconsin Electric	X		
Stuart Goza; TVA (2)	X		
Susan Morris; SERC	x		

25. Do you agree with the measures?

Summary Consideration: Many commenters indicated that keeping a list of activities that involved coordination between RAs would be burdensome and since the only reason for including that list was to make compliance easier to administer, that requirement has been dropped from the standard.

Commenters	Yes	No	Comments
Don Reichenbach; SERC Ops Plng Sub (8) Susan Morris; SERC			What is required in measure 3 to verify the actions of other RAs? This measure needs to either be clarified as to what is expected of RAs regarding verifying the actions of other RAs or it needs to be removed.
There is a section in the Compliance Monitoring that addresses interviewing other RAs to confirm that coordination takes place.			
Don Chandler; CenterPoint Energy (2)		x	The measures as they currently are, do not address all operating entities. –RTS
Agreed. This standard is limited to RA to RA coordination.			
A. Ralph Rufrano; NYPA Kathleen Goodman; ISO NE Guy Zito; NPCC-CP9 (10)		x	Although I am aware of the need and the complexity of attempting to develop measures that can appropriately certify compliance, it seems the measures as proposed are too detailed, time-consuming and may distract from taking actions as opposed to logging the actions that should be taken.
The most cumbersome detail was requiring a list of events – and that has been deleted. Other documentation requirements are routinely conducted to document control room actions and shouldn't be cumbersome.			
Alan Boesch; NPPD		x	The measure should require a log of coordinated events with RAs, BAs, Ias and TOPs. I do not agree with measure 3. The contents of the log is not a reliability issue. Measures should focus on results and should check if the response is consistent with approved processes, procedures and plans.
This standard is limited to RA to RA coordination.			
Don Gold; BPA (6)		x	Keeping a list is a lot of busy work and should only be necessary as a last resort. If the other RAs in the interconnection verify (state) that the coordination is being done that should be adequate. If the other RAs state that coordination is not being done then they should also provide specific dates and times so the situation can be investigated and level of non-compliance determined.

The requirement to keep a list of coordinated activities was dropped from this standard. There is a section in the Compliance Monitoring that addresses interviewing other RAs to confirm that coordination takes place.			
Joseph C. Fleury; NYSRC Robert W Waldele; NYISO		x	Administrative requirements in this Standard are potentially excessive and may distract from overall intent of monitoring and logging actions taken; that is, the reliability function gets lost in the compliance reporting details.
The most cumbersome detail was requiring a list of events – and that has been deleted. Other documentation requirements are routinely conducted to document control room actions and shouldn't be cumbersome.			
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)		x	These measures require overburdening administration. These risk distracting attention from reliability monitoring to logging actions taken.
The most cumbersome detail was requiring a list of events – and that has been deleted. Other documentation requirements are routinely conducted to document control room actions and shouldn't be cumbersome.			
Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen		x	Appears to check information exchanged during identified coordination events, it does not appear to check that each appropriate coordination event was identified and resulted in an information exchange. Probably need to require RAs to keep a list of events requiring coordination and compare lists between neighboring RAs to check compliance this way. Then you can check that proper information was exchanged.
This is what was originally intended with the requirement that coordination activities be documented. However, many commenters indicated that maintaining such a list would be cumbersome, and this requirement has been dropped from this standard.			
Blaine Keener; PSC of MD		x	
Roger Champagne; Hydro Quebec	x		It seems the measures as proposed are too detailed, time-consuming and may distract from taking actions as opposed to logging the actions that should be taken.
The most cumbersome detail was requiring a list of events – and that has been deleted. Other documentation requirements are routinely conducted to document control room actions and shouldn't be cumbersome.			
George Bartlett; Entergy	X		
James Spearman / Florence Belser; PSC of SC	X		
John Horakh; MAAC	x		

Peter Burke; ATC	X		
Karl Kohlrus; City Water Light & Power	X		
William F. Pope; Gulf Power Company	X		
William J. Smith; Allegheny Power	X		
Tom Pruitt; Duke Power (3)	X		
Ed Riley; CA ISO	X		
Albert DiCaprio; PJM (4)	X		
Operating Reliability Working Group – Southwest Power Pool (9)	X		
Richard J. Kafka; Pepco	X		
Gerald Rheault; Manitoba Hydro	X		
P. D. Henderson / Khaqan Khan; The IMO	X		
Patti Metro; FRCC (7)	X		
Rick Stegehuis; Wisconsin Electric	X		
Stuart Goza; TVA (2)	x		

26. Do you agree with the compliance monitoring process?

Summary Consideration: Most commenters did not agree with the compliance monitoring process, and it has been revised to eliminate the 'spot checks' and the need to have a list of events involving RA to RA coordination.

Commenters	Yes	No	Comments
Don Gold; BPA (6)			An annual spot check is to frequent. A random spot check seems appropriate.
The standard was revised to eliminate the 'spot checks'.			
Don Reichenbach; SERC Ops Plng Sub (8)			The issue of an annual audit is contained in this requirement as well. Also, item 1 includes an interview of other RAs by the Compliance Monitor to verify self-certifications. As mentioned above, there are no guidelines on what documentation is necessary for this activity.
Additional details on what documentation needs to be available to the Compliance Monitor have been added – as revised, the standard requires that you collect evidence – and this may be an operating log or other data source. The intent is not to make any entity change the way they are documenting their real-time activities today, just to make sure that whatever documentation you collect will be kept long enough that it will be available to the Compliance Monitor when it is time for an audit.			
Richard J. Kafka; Pepco		x	Does the compliance process create a Compliance Monitor? If this is adequately addressed, I would agree with the process
The Compliance Monitor is a defined 'function' in the Functional Model. For most entities, the Compliance Monitor is the Regional Reliability Organization. In cases where the RA is also the RRO, then either NERC or an independent auditor will serve as the Compliance Monitor.			
A. Ralph Rufrano; NYPA Joseph C. Fleury; NYSRC Kathleen Goodman; ISO NE Guy Zito; NPCC-CP9 (10) Roger Champagne; Hydro Quebec		x	The first Item (2) timing seems to be off somewhat. Numbering needs to be fixed. See comment above re. Item (3) compliance monitoring
Agreed. This section has been revised.			
Karl Kohlrus; City Water Light & Power		x	There appears to be errors in (e)(1) and (e)(2) (ii) All events did not have evidence… iii) Each event that involved conflicting system status or studies did not have documented results…
The text was correct as originally presented. The intent was to say that unless there is evidence that all events were coordinated, you start your			

non-compliance at level three. There were several comments indicating this section was confusing, and the SDT has revised it so that it is easier to understand.			
Alan Boesch; NPPD		x	I am not sure that item 3 is part of the process it sounds a lot like a requirement. What is the required storage length for logs? One year?
Item 3 is part of the compliance monitoring process – it tells the entity responsible for compliance what documentation it needs to have available when the compliance monitor does an audit or spot check. As noted in the standard – the RA must keep its logs (or other data sources used to document its coordination activities) for the prior year and current calendar year.			
Blaine Keener; PSC of MD		x	The existing process for monitoring and assuring compliance with NERC and regional reliability standards was shown to be inadequate to identify and resolve specific compliance violation before those violations led to a cascading blackout. The proposed Compliance Monitoring Process does not resolve this problem and is not effective in case of disagreement between different Reliability authorities.
The standard has been revised to clearly state how RAs should act when there is a disagreement on either the problem or the solution to a problem. The actions taken are intended to support the reliability of the interconnection by defaulting to the most conservative of the identified options.			
Don Chandler; CenterPoint Energy (2)		x	It does not monitor the coordination of operations, only the communication between RA's. -RTS
All involved RAs should have evidence to support the actions taken. This should serve to support whether the RAs worked together to coordinate actions to support reliability.			
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)		x	See comments to Question 25. (These measures require overburdening administration. These risk distracting attention from reliability monitoring to logging actions taken.)
The most cumbersome detail was requiring a list of events – and that has been deleted. The logging that is required is the same logging that is normally conducted to document routine operations. If the measure requires system operators to log information that they don't currently log, please be specific in letting us know what that is.			

Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen		x	See comments in No. 25 above. Should probably use lists from randomly chosen adjacent RA to cross check. (Appears to check information exchanged during identified coordination events, it does not appear to check that each appropriate coordination event was identified and resulted in an information exchange. Probably need to require RAs to keep a list of events requiring coordination and compare lists between neighboring RAs to check compliance this way. Then you can check that proper information was exchanged.)
Industry commenters have indicated that keeping a list of activities that were coordinated between RAs would be burdensome because RAs coordinate so many events.			
Patti Metro; FRCC (7)		x	See attached red-line version with suggested FRCC changes.
See comments on attachment.			
Susan Morris; SERC		x	The following is an excerpt from 103 Coordination, (d) Compliance Monitoring Process, Item (1): ….The self-certification shall include a list of the prior year's dates on which this Reliability Authority identified a potential, expected, or actual problem that adversely impacted the reliability of one or more other Reliability Authorities and the names of the Reliability Authorities that were contacted….. This statement is so inclusive that the "list of prior year's dates" could be all dates (every day). The nature of the system and current boundaries can always have the existence of an identified potential, expected, or actual problem that can adversely impact the reliability of one or more other Reliability Authority Areas. If this statement cannot be changed to narrow the scope to newly identified situations, then it is suggested that instead of a list, that the compliance monitoring process request a database of these situations. This would also result in RAs developing/using some type of communication system that automatically logs such interactions with the required info.
We received several comments indicating that keeping a list would be burdensome, and that requirement has been dropped from the standard. The compliance monitoring process and levels of non-compliance have been adjusted to reflect this change.			
Robert W Waldele; NYISO		x	what if the problem was not "agreed on"? This presents a possible "catch-22" situation if the RAs cannot agree that there is a problem.
This did happen on August 14 and is the reason the SDT added the language to identify what actions to take if the involved RAs can't agree on the problem. If two RAs have conflicting information and don't agree on what they're seeing, then this standard requires Both RAs to re-evaluate the situation. Neither RA is allowed to assume that the problem doesn't exist and both are required to take actions as though the			

problem does exist.			
P. D. Henderson / Khaqan Khan; The IMO	x		In section d (1), the clause pertaining to "3 business days notice" for annual spot check may be removed. We feel that the clause mentioned in the same section i.e. "sufficient time to comply with control center's security access procedure" for annual spot check is appropriate and sufficient in itself
Annual spot checks were removed from the standard.			
James Spearman / Florence Belser; PSC of SC	x		The Compliance Monitoring process should be initiated for any recognized reduction in reliability or actual unanticipated outage. The procedures should be reviewed and revised as necessary to account for lessons learned.
The scenario you've described would be considered an investigation as a result of a compliant and is addressed in the Compliance Monitoring section of the revised standard.			
Operating Reliability Working Group – Southwest Power Pool (9)	X		
George Bartlett; Entergy	X		
Peter Burke; ATC	X		
John Horakh; MAAC	X		
William F. Pope; Gulf Power Company	X		
William J. Smith; Allegheny Power	X		
Ed Riley; CA ISO	X		
Tom Pruitt; Duke Power (3)	X		
Albert DiCaprio; PJM (4)	X		
Gerald Rheault; Manitoba Hydro	X		
Rick Stegehuis; Wisconsin Electric	X		
Stuart Goza; TVA (2)	X		

27. Do you agree with the levels of non-compliance?

Summary Consideration: There was no consensus in support of the levels of non-compliance as originally presented. The SDT modified the levels of non-compliance so they are less complex.

Commenters	Yes	No	Comments
Marc Butts; Southern Co Svcs (10) Roman Carter; Southern Co Gen			See notes on Nos. 25 and 26 above. (Appears to check information exchanged during identified coordination events, it does not appear to check that each appropriate coordination event was identified and resulted in an information exchange. Probably need to require RAs to keep a list of events requiring coordination and compare lists between neighboring Ras to check compliance this way. Then you can check that proper information was exchanged.)
The standard does not make value judgments about the quality of the actions taken – just that a good faith effort was made to coordinate. Other standards are expected to require that certain system performance targets be met. The IROL standard would sanction an RA that allowed its RA Area to exceed any IROL – the Balance Resources and Demand standard would sanction an RA that allowed a frequency limit to be exceeded, etc.			
Richard J. Kafka; Pepco		x	In general, the allowed levels of non-compliance seem high. I would need good reasons to accept these levels.
Please provide us with some guidance on what you think are appropriate levels.			
A. Ralph Rufrano; NYPA Guy Zito NPCC-CP9 (10) Kathleen Goodman; ISO NE		x	See comment to question #25.*(Although I am aware of the need and the complexity of attempting to develop measures that can appropriately certify compliance, it seems the measures as proposed are too detailed, time-consuming and may distract from taking actions as opposed to logging the actions that should be taken.)*
Agreed. The standard has been revised to allow each RA to provide evidence of the actions it took – evidence could include voice recordings, operator logs, or other data sources. This should make it easier to comply with the intent of the standard.			
Tom Pruitt; Duke Power (3)		x	The rules for each level are too complicated. See overall comments at the end of this form.
The SDT has tried to simplify the levels of non-compliance. The levels of non-compliance were revised so that a lack of evidence of coordination is a level 1, and a lack of coordination is a level 4.			
Alan Boesch; NPPD		x	Non-compliance focuses on have information as opposed to implementing processes,

			procedures and plans to get good results.
The levels of non-compliance were revised so that a lack of evidence of coordination is a level 1, and a lack of coordination is a level 4.			
Joseph C. Fleury; NYSRC		x	See comment to question #25 (Administrative requirements in this Standard are potentially excessive and may distract from overall intent of monitoring and logging actions taken; that is, the reliability function gets lost in the compliance reporting details.)
The levels of non-compliance were revised so that a lack of evidence of coordination is a level 1, and a lack of coordination is a level 4.			
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)		x	See comments to Question 25. (These measures require overburdening administration. These risk distracting attention from reliability monitoring to logging actions taken.)
The standard has been revised to allow each RA to provide evidence of the actions it took – evidence could include voice recordings, operator logs, or other data sources. This should make it easier to comply with the intent of the standard.			
Roger Champagne; Hydro Quebec		x	See comment to question #25. (It seems the measures as proposed are too detailed, time-consuming and may distract from taking actions as opposed to logging the actions that should be taken.)
The standard has been revised to allow each RA to provide evidence of the actions it took – evidence could include voice recordings, operator logs, or other data sources. This should make it easier to comply with the intent of the standard.			
P. D. Henderson / Khaqan Khan; The IMO		x	Reference Section e) (I) & (2): It would be appropriate if a %-age of threshold is used as a criteria for assessing non-compliance levels rather than absolute counts of number of events, e.g. instead of saying "Less than five events (identified through self-certification ….)", the criteria may say "Up to 10% of total events (identified through self-certification……). Such a philosophy would more adequately address the non-compliance measure for all entities on equal proportion basis.
Self-certification no longer requires a list of events and the standard was revised to eliminate the references to the number of events. There would be no base number of events from which to select a %.			
Robert W Waldele; NYISO		x	
Operating Reliability Working Group – Southwest Power Pool	x		

George Bartlett; Entergy	x		
Peter Burke; ATC	x		
James Spearman / Florence Belser; PSC of SC	x		
John Horakh; MAAC	x		
William F. Pope; Gulf Power Company	x		
William J. Smith; Allegheny Power	x		
Albert DiCaprio; PJM (4)	x		
Blaine Keener; PSC of MD	x		
Don Chandler; CenterPoint Energy (2)	x		
Don Reichenbach; SERC Ops Plng Sub (8)	x		
Gerald Rheault; Manitoba Hydro	x		
Patti Metro; FRCC (7)	x		
Rick Stegehuis; Wisconsin Electric	x		
Stuart Goza; TVA (2)	x		
Susan Morris; SERC	x		
Ed Riley; CA ISO	x		

28. Are you aware of any Regional or Interconnection Differences that should be added to this standard?

Summary Consideration: No regional differences were identified.

Commenters	Comments
William J. Smith; Allegheny Power	We are not aware of any Regional or Interconnection Differences.
Gerald Rheault; Manitoba Hydro	Manitoba Hydro is not aware of any Regional Differences that should be added to this standard
Joseph C. Fleury; NYSRC	The NYSRC Reliability Rules are not inconsistent with or less stringent than the proposed NERC Standard, and the NYSRC has elected not to propose that NYSRC Reliability Rules be made part of this Reliability Standard.
Patti Metro; FRCC (7)	We are not aware of any Regional or Interconnection Differences that should be added to this standard.
Susan Morris; SERC	This is not necessarily a defined Regional difference, but it may be appropriate to repeat as stated in question 3 above: For some Regions, entities that perform Reliability Authority functions have two distinct "groups" of personnel to address real-time assessments and operational planning analysis. In other Regions, entities that perform Reliability Authority functions assign both real-time and operational planning assessments/analysis, respectively to the same personnel. Given that the NERC Reliability Functional Model Version 2 does not explicitly state that the Reliability Authority is responsible for performing operational planning analysis, it should be assumed because the Planning Authority generally covers one year and beyond. Therefore, it is suggested that the operational planning horizon be defined as all analysis for day 2 through 1 year. This would warrant the need for two distinct requirements: 1) Real-Time Assessments (current hour through day 2) and 2) Operational Planning Analysis (day 2 through 1 year). This would ensure that there is no gap between the responsibilities of the Reliability and Planning Authorities, in fact, the line between horizons should be subject to overlap if a reliability concern is evident.
This distinction does not seem to be a Regional Difference.	

29. Do you have any other comments on the standard?

Commenters	Comments
Ralph Rufrano; NYPA Guy Zito; NPCC-CP9 (10)	1. The Standards in general appear to reference a particular version of the Functional Model in the Applicability section. Given the "evolution" of the Model, is this appropriate? 2. There is an issue with the concept of a monetary sanction matrix and what its implications are. ISO-NE, as well as NPCC, has expressed concern over its inclusion and maintains that the use of market mechanisms where possible, as well as, letters of increasing degrees of severity and notifications to regulatory agencies are more effective in ensuring compliance. Failure of NERC to gain authority through reliability legislation could result in NERC pursuing actions to implement "Plan B," a "voluntary" approach affording NERC the authority to perform these types of monetary sanctions. ISO-NE has indicated that any posted Standard, with such a matrix, will not be supported by ISO-NE. There are, however, proceedings at NERC by the Compliance Certification Committee (CCC) to address alternative sanction proposals and ISO-NE will continue to work to oppose monetary sanctions. 3. We also have concerns with the associated implementation plan that typically is developed and released with the Standard. We would like to note that there may be new and additional requirements and compliance metrics that are approved with this standard. These new requirements may require considerable time to implement them and the Implementation Plan must recognize this.
1. The reference to a particular version of the Functional Model will not be included in the next version of the standard. 2. The SDT has no authority to remove monetary sanctions from the standard. The sanctions table includes the use of both letters and financial sanctions, and changing the table is outside the scope of the SDT – it was approved by the NERC Board. 3. The Implementation Plan includes a time period to give entities time to come into compliance. The implementation plan should be posted with the next version of this standard. So far, the standard doesn't seem to have any requirements that entities develop processes, procedures or plans that aren't currently required under approved Nerc Policies.	
Joseph C. Fleury; NYSRC	1. This draft Standard places too much emphasis on the compliance measurement and levels of non-compliance, and not enough on the details of the requirements. There is considerable explanatory detail contained in the "Overview" at the beginning of the Comment form. The drafting team should consider including this within the Standard and make it more self-explanatory. The reader should not have to refer to multiple sources for explanations, and the detail should be part of the approved document.

	2. The NYSRC is opposed to monetary sanctions as the only option for dealing with noncompliance as applied in this and other proposed NERC Standards. Unfortunately, direct monetary sanctions invite "gaming the system", and encourage "business" decisions based on potential profits or savings versus potential penalties. Instead of monetary sanctions, the NYSRC prefers that NERC have the authority to issue letters of increasing degrees of severity to communicate noncompliance of mandatory standards. The NYSRC and NPCC now rely on a more stringent and mandatory process than monetary sanctions to assure compliance with reliability standards. Compliance is now mandatory through the contractual agreements and tariffs that all participants need in order to conduct business. The use by the NYSRC and NPCC of letters to regulatory agencies and other oversight bodies for reporting noncompliance has demonstrated that letter sanctions are a more effective tool for ensuring adherence to standards. Such letters establish the basis for liability in the event of a subsequent criterion violation, and in the case of market participant noncompliance, threaten the violator's ability to do business with or through an ISO or RTO. Moreover, letters that communicate noncompliance best allow focus on the "root cause" of a violation, as well as its reliability impact. Therefore, the NYSRC recommends that this and other NERC Standards expressly provide that letter sanctions be used in addition to or instead of monetary sanctions under circumstances in which they would be an equally or more effective enforcement mechanism. 3. The NYSRC also has concerns with the associated implementation plan that typically is developed and released with the Standard. The NYSRC would like to note that there may be new and additional requirements and compliance metrics that are approved with this standard. These new requirements may require considerable time to implement them and the Implementation Plan must recognize this.
1. The new format for NERC Reliability Standards is to be as succinct as possible under the advice of NERC's VP and Legal Counsel. This does not preclude the SDT from developing or having developed a technical reference that provides additional details that may provide examples to support the content of the standard. 2. The SDT has no authority to remove monetary sanctions from the standard. The sanctions table includes the use of both letters and financial sanctions, and changing the table is outside the scope of the SDT – it was approved by the NERC Board. 3. The Implementation Plan includes a time period to give entities time to come into compliance. The implementation plan should be posted with the next version of this standard. So far, the standard doesn't seem to have any requirements that entities develop processes, procedures or plans that aren't currently required under approved Nerc Policies.	
Kathleen Goodman; ISO NE	1. The Standards in general appear to reference a particular version of the Functional Model in the Applicability section. Given the "evolution" of the Model, is this appropriate? 2. Throughout the Standards there should be recognition of timing required for training and implementation. For example, if we receive a new Procedure and need three weeks to train our operators before implementing the Procedure, technically, we could be found non-compliant before we

	"formally" implement the Procedure. Perhaps this is something that could be addressed through the Document Change Control Procedure. 3. The Levels of Non-Compliance on all requirements should be revisited for measurability, practicality, and timing. 4. There is an issue with the concept of a monetary sanction matrix and what its implications are. ISO-NE, as well as NPCC, has expressed concern over its inclusion and maintains that the use of market mechanisms where possible, as well as, letters of increasing degrees of severity and notifications to regulatory agencies are more effective in ensuring compliance. Failure of NERC to gain authority through reliability legislation could result in NERC pursuing actions to implement "Plan B," a "voluntary" approach affording NERC the authority to perform these types of monetary sanctions. ISO-NE has indicated that any posted Standard, with such a matrix, will not be supported by ISO-NE. There are, however, proceedings at NERC by the Compliance Certification Committee (CCC) to address alternative sanction proposals and ISO-NE will continue to work to oppose monetary sanctions. 5. We also have concerns with the associated implementation plan that typically is developed and released with the Standard. We would like to note that there may be new and additional requirements and compliance metrics that are approved with this standard. These new requirements may require considerable time to implement them and the Implementation Plan must recognize this.
1. The reference to a particular version of the Functional Model will not be included in the next version of the standard. 2., 5. The Implementation Plan includes a time period to give entities time to come into compliance. The implementation plan should be posted with the next version of this standard. So far, the standard doesn't seem to have any requirements that entities develop processes, procedures or plans that aren't currently required under approved Nerc Policies. There shouldn't be a need to conduct any lengthy training. 3. The levels of non-compliance have been adjusted so they are simpler to understand. 4. The SDT has no authority to remove monetary sanctions from the standard. The sanctions table includes the use of both letters and financial sanctions, and changing the table is outside the scope of the SDT – it was approved by the NERC Board.	
Roger Champagne; Hydro Quebec	1. The Standards in general appear to reference a particular version of the Functional Model in the Applicability section. Given the "evolution" of the Model, is this appropriate? 2. There is an issue with the concept of a monetary sanction matrix and what its implications are. Hydro-Québec TransÉnergie is in agreement with NPCC which has expressed concern over its inclusion and maintains that the use of market mechanisms where possible, as well as, letters of increasing degrees of severity and notifications to regulatory agencies are more effective in ensuring compliance. Failure of NERC to gain authority through reliability legislation could result in NERC pursuing actions to implement "Plan B," a "voluntary" approach affording NERC the authority to perform these types of monetary sanctions. Hydro-Québec TransÉnergie will not support such a matrix. There are, however, proceedings

	at NERC by the Compliance Certification Committee (CCC) to address alternative sanction proposals and Hydro-Québec TransÉnergie will continue to work to oppose monetary sanctions. 3. Could E-tag system and Interchange Distribution Calculator (IDC) be tools that can provide information to be used by this Standard?
1. The reference to a particular version of the Functional Model will not be included in the next version of the standard. 2. The SDT has no authority to remove monetary sanctions from the standard. The sanctions table includes the use of both letters and financial sanctions, and changing the table is outside the scope of the SDT – it was approved by the NERC Board. 3. If E-tag or the IDC is part of the 'evidence' trail you use to document the actions you've taken, then this would be acceptable evidence in support of this standard's requirements.	
Tom Pruitt; Duke Power (3)	The levels of non-compliance for each requirement (especially 101) should be simplified. The question of compliance should come to this: Did the RA meet the requirements? Yes/No. Levels 1-4 violation should be based on the number of times this has occurred in the last 12 month period. For example, To simplify compliance measurement, but also employ graduated corrective action, please consider the following: Level 1 – first violation (of any kind) in previous 12 months, audit after 180 days; Level 2 – second violation in previous 12 months, audit after 90 days; Level 3 – third violation in previous 12 months, audit after 90 days and 180 days; Level 4 – fourth (or more) violation(s) in previous 12 months, audit every 90 days until 4 consecutive audits with no violations; This approach still keeps the focus on the right standard (100% compliance), but allows for the reality that errors may occur. Repeated errors will become increasingly expensive for the violator, however, so the violator will be incented to change.
All of the levels of non-compliance have been modified. The audit system you've presented is more like a compliance procedure than a determination of an appropriate sanction for noncompliance. The SDT added language to the compliance monitoring section of requirement 103 to indicate the Compliance Monitor can conduct audits every 90 days until the entity is found fully compliant.	
Alan Boesch; NPPD	Reviewing this standard is extremely difficult because the requirements of the Reliability Authority are spread out in several other standards.

	1. There are three items that are in the functional model and not contained in this or any other standard: reactive requirements determination (item 8 in RA tasks and item 4 in Transmission Operator relationships) redispatch adjustments to mitigate congestion within the Reliability Authority Area (item 3 of RA relationships with other entities) Reliability mitigation of equipment overloads as requested by the TOP (requirement 12 of TOP relationship with other entities). All of these items are coordination issues and should be included in this standard. 2. All of the requirements in the Certification Standard are one time requirements for certification. The standard does not contain any periodic monitoring. To the extent that the requirements in the certification standard are related to coordination issues they should be required and measured in this standard. 3. This standard should focus on implementation and not the existence of procedures. The existence of procedures, processes and plans will be a requirement of certification and can be measured during the certification process. 4. This item may not be an issue that is specific to this standard. When this standard was supplied to one of out operators he said that he had a hard time reviewing the standard because of the format. Somehow the NERC community needs to organize the requirements and measures in a format that is useful to system operators. System operators do not need to be concerned with the method for measuring compliance or the levels of non-compliance. System operators will be responsible for implementing these standards. The standards need to be organized and present to the operators in a format that is easy to read and understand. Please forward this comment to the NERC compliance/standards office.
1. We can't add items to this standard because they are addressed in the Functional Model and aren't included in any other standard. As noted in the Functional Model's technical reference, there may not be a standard developed for every task in the Functional Model. 2. The SDT has tried to do this. 3. It is very difficult for an RA to implement actions 'on the fly'. This standard recognizes that and requires that the RA have procedures, processes or plans for certain types of situations that involve multiple RAs. This is supported by the associated SAR. 4. When these standards are completed they will be entered into a relational database and will be retrievable in several different formats. You should be able to request a report that just includes the requirements and measures.	

Albert DiCaprio; PJM (4)	1. This standard being proposed by the SDT does not directly address the issue of reliability. As written, the Standard proposes good practices but misses the opportunity to respond to current NERC Standard shortcomings. 2. Having ***a Change Control process*** or an operator "having" the latest version of an Operating procedure are good ideas – but having such a process or having the latest version is no replacement for reacting properly in adverse situations. 3. The SDT proposes to punish an RA that doesn't have verification that its neighbors have the latest version of a procedure. But, as the standard is now written, if a properly trained operator of that RA responded correctly (without referring to a document) that would not count, in fact that RA would be in violation of the standard if the operator did NOT follow a procedure as written (even if that procedure were in error). 4. NERC currently does not have a policy or standard that requires entities to monitor, coordinate, mitigate and/or correct IROL conditions identified within other entities areas. There is no backstop among areas. The US-Canada Interim Report states a cause of the blackout was: *"PJM and MISO lacked joint procedures or guidelines on when and how to coordinate a security limit violation observed by one of them in the other's area due to a contingency near their common boundary."* PJM recommends that the SDT ask the Industry whether or not it wants to continue to write standards that merely document procedures, or to write standards that will protect reliability. Such reliability standards could be simple and direct: ▪ Each RA shall monitor all of their adjacent control Areas' Reliability Areas. ▪ Each RA shall immediately inform their neighbors of any actual or forecasted contingency violation of an IROL limit. ▪ Each RA shall immediately respond to all IROL violation inquiries from their neighboring Ras either by: ▪ Verifying discrepancies in monitoring, and/or ▪ Agreeing to a correction procedure, and/or ▪ Implementing agreed to procedures, or ▪ Both operating to the most restrictive condition posited be either RA.

	The above explicitly requires Ras to have sufficient monitoring to cover its neighbors' entire areas. This requirement would eliminate the need to define wide-area. If an RA has the ability to monitor all of its neighbors, then it is big enough to be an RA. The PJM proposal eliminates paper work, and requires specific agreements – whether or not those agreements are in some database. 5. An "Abnormal" situation is a situation that Ras are not prepared for, which means they wouldn't have the specific procedures they need to use anyway. And any procedures they did have, would be for common well-known situations and likely not apply to the situation at hand. 6. The PJM proposal also eliminates a requirement of blind adherence to procedures (do we want operators that only follow procedures or do we want operators that are free to respond to the conditions they face) and opens the standards up to what many in the Industry want – effective common sense standards. 7. The PJM proposal requires that Ras have on-going communications capabilities with its neighbors- without mandating daily conference calls or ad hoc protocols. 8. The SDT standard would be better served by focusing on the core issues. To deal with conflicts the SDT proposed standard requires each RA to work on its (even if its actions counter the actions of the other Ras) . The PJM proposal eliminates the conflict by using the most restrictive limit. Having the right version of a procedure is not as valuable as having the right solution. 9. The SDT is requested to ask the industry what the industry wants as a measure of good operation – a checklist? Or does the industry want black and white (level 4 non-compliance) requirements that: when informed of an real or potential transmission integrity threat the Ras will operate to the most limiting process, procedure or limit defined by involved Ras?

1. The SDT is required to develop a standard that is within the scope of its associated SAR. The SDT does not have the authority to change the scope without changing the SAR. As shown by industry comments, while PJM may want 'high level' performance standards, many others in the industry are looking for a 'revision' to the Operating Policies and Planning Standards that are in use today.

2. There was no consensus to support including a requirement to have a document change control procedure, and this has been removed from the draft standard.

3. There are other standards under development that address the issue of performance. For example, the IROL Standard sanctions the RA if the RA allows any IROL in its RA Area to be exceeded for time greater than T_v – the same standard sanctions any entity that ignores a directive issued by its RA. The Balance Resources and Demand standard has similar requirements. The intent of this requirement was to ensure that RAs had a commitment to help one another and a commitment to share information that may provide other RAs with improved 'situational awareness'.

4. The IROL Standard has been revised to include the items you've suggested. 5. Agreed. The word, 'abnormal' is not used in the proposed standard. 6. The proposed Coordinate Operations standard only requires adherence to the procedures that address commitments to share information between RAs. The SDT recognizes that real-time conditions don't always match the expected conditions that serve as a base for a process, procedure or plan. There are no measures in this standard that assess sanctions for operations actions – but the standard does assess sanctions for not sharing information and for not working with neighbors to come to agreement on how to address credible problems. 7. The standard has been revised so that it doesn't require daily calls – but does mandate that calls be conducted at least once a week. This should help ensure RAs maintain situational awareness of the conditions in existence beyond the RA's borders. 8. The standard has been revised to support this suggestion. 9. The standard was revised to include the requirement that RAs with disagreements operate to the most conservative actions/solutions/limits. We will ask the industry for feedback, as suggested.	
Blaine Keener; PSC of MD	101(d)(4) and 103(d)(2) is repetition, in general a lot of repetition between 101 Procedures and 103 Coordination. Could be just references.
The intent of 101 was to ensure that RAs met with one another and agreed on what actions to take under a variety of scenarios. The intent of 103 is to mandate that RAs work together to solve problems that involve more than one RA Area. In other words – Requirement 101 is telling RAs to have a set of procedures – Requirement 102 is telling RAs to follow those procedures in keeping one another informed of changing conditions – and Requirement 103 is telling RAs to work together when unusual situations occur and the resolution involves more than just one RA.	
Don Gold; BPA (6)	Section 102 does not have any questions on the Compliance Monitoring or levels of non-compliance. The following comments are offered for 102 – Notifications and Information Exchange: 102.e (2)(i)(A) & (B): "On one occasion … may impact …". How and Who is going to measure this and if it only "MAY" impact, it seems subjective and extremely hard to measure and/or judge. Also "On one occasion … as requested" – same comment plus what was the situation where the information was not provided? Did the request come from a marketer where the RA is not allowed to provide the information or did an RA that was not impacted request the information while the Ras that were impacted were still working on the problem? Same comments on the other levels.
As noted in the compliance monitoring process, the Compliance Monitor will use a variety of techniques, including interviews with other RAs within the Interconnection to verify that the RA being audited has been making notifications and exchanging reliability-related information according to approved procedures.	

The standard doesn't address requests from marketers – it addresses requests for information from other RAs.	
Don Reichenbach; SERC Ops Plng Sub (8)	We feel that the SAR, and therefore, the standard are too narrowly focused on the coordination necessary among Ras. There are other entities and wider timeframes that need to be covered under the name of "Coordinate Operations." If this cannot be accomplished, then this standard should be renamed to reflect the focus of RA Operations Coordination AND another SAR should be developed to cover the other areas of coordinate operations.
Agreed. The SAR DT that developed the SAR for this standard could not get industry consensus on having this standard address all coordination. The SAR DT advised the NERC OC that there may be a need for another SAR to be developed to address coordination between other entities. Some of the coordination is being addressed in other standards such as the Coordinate Interchange standard.	
Susan Morris; SERC	Since this SAR only focuses on coordination necessary among Ras, will another SAR be developed to cover the other areas of coordinate operations? It is important to have specific requirements for Reliability Authorities to share information with each other, especially its Operating 3P's (Procedures, Processes, and/or Plans); however, Reliability Authorities should not operate in a vacuum from the rest of the industry. This is another reason why the Reliability Authority should be actively involved with the entire operational planning horizon (day 2 through 1 year) because if the only thing a Reliability Authority focuses on is the current hour to next day, then there is no way to incorporate lessons learned or continuous improvement to the Operating 3P's. This potential to promote "RA tunnel vision" could result in less reliable operations.
The SAR DT that developed the SAR for this standard could not get industry consensus on having this standard address all coordination. The SAR DT advised the NERC OC that there may be a need for another SAR to be developed to address coordination between other entities. Some of the coordination is being addressed in other standards such as the Coordinate Interchange standard.	
H. Steven Myers; ERCOT	Since ERCOT is interconnected with other systems only through the DC Ties, the language regarding the requirement to coordinate and share ratings/limits with other Ras should reflect only the requirement to share ratings/limits for the interconnecting facilities (in this case, DC Ties).
This standard leaves it up to the RAs to determine what needs to be addressed in Operating Procedures, Processes or Plans, as long as each RA has documents to support all 6 of the topics addressed in revised requirement 101.	
Karl Tammar ; ISO/RTO Council-Stds Rev Com (10)	Level 4 non-compliance should be reserved for an actual or continuous exposure to actions that genuinely harm reliability. The standard will be more effective by simplifying the compliance monitoring to the extent practicable through web postings and other automation.
The levels of non-compliance have been adjusted. The use of any particular tool for compliance monitoring is left to those administering the compliance monitoring process and is outside the scope of the SDT.	

Patti Metro; FRCC (7)	Throughout the standard the phrases " Operating Procedure, Process, or/and/of Plan" and " Operating Procedures, Processes, or/and/of and Plans" are used. The document should be consistent and OR should be the only conjunction used in this context.
The SDT has been prohibited from using any 'slashes' in the text of its standard. We have reviewed the standard to ensure that when the phrase, 'operating procedure, process or plan' is used the correct word ('and' or 'or') has been selected. In some cases, 'or' is the correct word – and in other cases, 'and' is the correct word.	
Robert W Waldele; NYISO	This draft of the Standard places too much emphasis on the compliance measurement and levels of non-compliance, and not enough on the details of the requirements. There is considerable explanatory detail contained in the "Overview" at the beginning of the Comment form, the drafting team should consider including this within the Standard and make it more self-explanatory. The reader should not have to refer to multiple sources for explanations, and the detail should be part of the approved document.
The requirements and measures are intended to be succinct statements of end performance. The standard includes all of the required elements as defined in the NERC Reliability Standards Process Manual. The Compliance Monitoring section is intended to address 'how' the requirements will be assessed, and does require more words. The Levels of Noncompliance are the most complex in a requirement such as this that contains many different elements. If you have specific suggestions for shortening the compliance elements, please forward them to the SDT for their consideration.	
Ed Riley; CA ISO	1) This draft of the Coordinate Operations Standard has been written dependent on certain requirements being covered in the RA Certification Standard and the Operate Within IROL Standard. The first draft of the RA Certification Standard has not yet been posted for review and the Operate Within IROL Standard failed on its first ballot attempt and is being re-written. With the uncertain final states of these two standards the CAISO is uncomfortable relying on requirements in the Coordinate Operations SAR not being included in the Coordinate Operations Standard. Could NERC please explain how the development of Reliability Standards is being coordinated? The RA Certification Standard only requires compliance for the initial certification process and does not encompass ongoing compliance audits. If requirements in the Coordinate Operations SAR are not being included in the Coordinate Operations Standard because they are included in the RA Certification Standard how will the RA be audited on a ongoing basis on these requirements? The CAISO does support the concept that a requirement should not be duplicated in more than one standard subjecting an entity to potential double compliance fine. The CAISO also believes that the final success of the Reliability Standards will be dependent on the development of the Reliability Standards database that will allow, for example, a RA to

	easily identify all Reliability Standard pertinent to RAs. What are the plans and schedule for the development of this database? 2) Levels of non-compliance – The formatting of many of the sections on non-compliance are difficult to follow and understand. A table format may work better.
1. The standards process staff is making a good faith effort to keep track of the requirements in each of the standards, and is trying to keep the various drafting teams apprised of the interdependencies in the elements of different standards. Ultimately, it is the industry that determines what will/will not be included in any one of the standards. If a requirement needs to be added to a standard, it can be done at a later time with another SAR. Several commenters have expressed the same concern and this has been forwarded to the Director-Standards. The standards development staff is working on a table that cross-references elements that one drafting team is assuming will be addressed in another SAR or Standard so they do not become 'lost'. 2. Several commenters shared your concern that a requirement not be duplicated in multiple standards. To add more clarity to this standard and to ensure that there aren't any duplicate requirements between this standard and the RA Certification Standard and the Operate Within IROLs Standard, the SDT made the following changes: The SDT added the following language to Requirement 103 to link performance in real-time RA-RA coordination with the written RA to RA agreement: The actions taken shall support the written Agreement(s) between RAs that define each RA's responsibilities with respect to acting with other RAs to protect the reliability of the Interconnection. The SDT asked the IROL SDT to add a footnote to requirement 207 to indicate that the processes, procedures and plans in Requirement 207 are limited to those for actions within the RA's Reliability Area. The development of the relational database to support the new reliability standards is outside the scope of the SDT. We forwarded your concern to the Director-Standards.	
Peter Burke; ATC	1. Under Standard 102 Measures Numbers (2) and (3)(ii) seem to be the same. Suggested changes to Standard 102 **Requirements:** Delete (1)(i). **Measure:** (1)The Reliability Authority shall have evidence it has followed its Operating Procedures,

	Processes or Plans for making notification and exchanging reliability-related information with other Reliability Authorities. (3)When questioned by its Compliance Monitor, each Reliability Authority shall identify other Reliability Authorities that they have: (i)Notified of conditions in their area that may impact the notifying RAs area. (ii)Delete (iii)Provided with requested reliability-related information **Compliance Monitoring:** (1)"…information according to approved Operating Procedures, Processes or Plans." (3)The Reliability Authority shall have the following available upon the request of its Compliance Monitor: (i)remains (ii)Evidence to show that notifications and exchanging reliability-related information was followed per its operating procedures, processes or plans. (iii)Evidence to show that requested reliability-related information was provided to the requesting RA. **Levels of noncompliance:** (2)Level two: There shall be a level two noncompliance if any of the following conditions are present: (i)One or more of the Reliability Authorities interviewed by the Compliance Monitor indicated that the Reliability Authority being audited and the audited Reliability Authority was unable to show otherwise: (A)On one occasion, did not provide notification or exchange reliability-related information as provided in the agreed too Operating Procedures, Processes or Plans. (B)On one occasion, did not provide reliability-related information, as requested These changes should also apply to Level three and four.
3.	In the original SAR under the title "Description" the following was stated.

	The following sections of the Operating Policies should be retired when this standard is implemented: Policy 4. C (all elements) Policy 9. A (all elements) Policy 9.B.1 Policy 9.B.4 Policy 9.C.2 Appendix 9.D.B.1.5 Appendix 9.D.B.1.6 Appendix 9.D.B.1.7 Could the SDT identify, to the best of its ability, which current standards will be retired when this standard is approved, which current standards will be retired by other standards now or soon to be pending approval, and which current standards are not addressed by any proposed new standards. Observation Policy 4. C #1-4. Partially covered in this Standard Policy 9.A #1. Falls under the IROL Standard #1.1 Not address in any current standard #1.2 Falls under the IROL Standard #2. Partially falls under this standard. #3. Falls under this standard #4. Its questionable if it falls under this standard. Policy B.1 Falls under RA Certification potentially.

	Policy B.4 It seems that it should fall under this standard. A suggestion would be to add Frequency to the list in section 101. Policy C.2 Falls under this Standard. Appendix 9D. B.1.5 Falls under this Standard Appendix 9D. B 1.6 Please see previous comments about frequency under Policy B.4. Appendix 9D B 1.7 Partially falls under this standard. This standard deals with only RA to RA communication.
1. The sections of the measures in Requirement 102 are not the same. The first measure is asking an RA to have evidence it participated in conference calls – and the second measure is asking other RAs to confirm that the RA in question did participate. 2. The levels of non-compliance have been changed 3. We appreciate your assistance in targeting which sections of existing Operating Policies should be retired when this standard is implemented. The SDT is working to develop its implementation plan for this standard and we have used the references from the SAR as a starting point.	

Comment from FRCC:

The following are in red-line format for the Compliance Monitoring portion of the standard.

101 Procedures

(d)Compliance Monitoring Process

(1) The Reliability Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually.

(i) The self-certification shall include a list of the latest approved version of documents distributed to other Reliability Authorities that address the following:

(A) Identified normal and emergency system conditions that require making notifications to other Reliability Authorities, exchanging information with other Reliability Authorities or the coordination of actions with other Reliability Authorities.

(B) Identified operating scenarios within one Reliability Authority Area that could have an adverse impact on another Reliability Authority's Area.

(C) Daily communications and real time notifications, including the conditions under which one Reliability Authority notifies other Reliability Authorities; the process to follow in making those notifications; and the data and information to be exchanged with other Reliability Authorities.

(D) Resolution of energy and capacity shortages.

(E) Exchange of planned or unplanned outage information.

(F) System restoration.

(G) Voltage control.

(H) Coordination of information exchange to support reliability assessments.

(ii) The self-certification shall also include a list of the latest version of company- specific Operating Procedures, Processes or Plans developed to support a source Operating Procedure, Process or Plan received from another Reliability Authority.

(2) The Compliance Monitor shall also use an annual spot check with 3 business days' notice, or sufficient time to comply with the control center's security access procedure. As part of the spot check, the Compliance Monitor shall interview other Reliability Authorities to:

(i) Verify that the Document Change Control Procedure has been followed.

(ii) Identify Operating Procedures, Processes or Plans that were distributed to the Reliability Authority being audited to verify that these documents are available for real-time use by the receiving Reliability Authority's system operators.

(iii) The results of the spot check shall be assessed and returned to the Reliability Authority within 30 days of the date of the spot check.

(3) The Compliance Monitor shall conduct an investigation upon a complaint that is received within 30 days of the alleged infraction's discovery date. The Compliance Monitor shall complete the investigation and report back to all involved Reliability Authorities (the Reliability Authority that complained as well as the Reliability Authority that was investigated) within 45 days after the start of the investigation. The results of the spot check shall be assessed and returned to the Reliability Authority within 30 days of the date of the spot check.

(4) The performance-reset period shall be one calendar year. The Reliability Authority shall keep documentation for prior year and current calendar year. The Compliance Monitor shall keep compliance data for a minimum of 3 years or until the Reliability Authority has achieved full compliance — whichever is longer.

(5) The Reliability Authority shall have the following documents available for the Compliance Monitor's inspection:

(i) The latest version of its Operating Procedures, Processes or Plans that address the following:

(A) Identified normal and emergency system conditions that require the exchange of information or the coordination of actions between Reliability Authorities.

(B) Identified operating scenarios within one Reliability Authority Area that could have an adverse impact on another Reliability Authority's Area.

(ii) Activities that require coordination between Reliability Authorities:

(A) Daily communications and real-time notifications, including the conditions under which one Reliability Authority notifies other Reliability Authorities; the process used for such notifications; and the data and information to be exchanged

(B) Resolution of energy and capacity shortages

(C) Exchange of planned or unplanned outage information

(D) System restoration

(E) Voltage control

(F) Coordination of information exchange to support reliability assessments

(iii) The latest copy of its Document Change Control Procedure

(iv) Evidence that its Operating Procedures, Processes or Plans were approved, updated and distributed in accordance with its Document Change Control Procedure.

102 Notifications and Information Exchange

Format for Compliance Monitoring should be the same as 101-general guideline and questions included below

(a) Compliance Monitoring

(1) The reliability authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually.

(2) The Compliance Monitor shall also use a scheduled on-site review at least once every three years. The Compliance Monitor shall interview other Reliability Authorities within the Interconnection and verify that the Reliability Authority being audited has been making notifications and exchanging reliability-related information according to approved procedures. Is the interview par of the on-sit visit or the spot check?

(3) Spot Check - What would the spot check include?

(4) The Compliance Monitor shall conduct an investigation upon a complaint that is received within 30 days of the alleged infraction's discovery date. The Compliance Monitor shall complete the investigation within 45 days after the start of the investigation. This should be re-written like the section for this in 101(d)

(5) The compliance-reset period shall be one calendar year. The reliability authority shall keep auditable documentation for a rolling 12 months. The Compliance Monitor shall keep compliance data for a minimum of 3 years or until the Reliability Authority has achieved full compliance — whichever is longer.

(6) The Reliability Authority shall have the following available upon the request of its Compliance Monitor:

(i) Evidence it has participated in agreed-upon daily conference calls or other communications forums.

(ii) Operating logs or other data sources that document notifications made to other Reliability Authorities.

103 Coordination

(d) Compliance Monitoring Process

(1) The Reliability Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually. The self-certification shall include a list of the prior year's dates on which this Reliability Authority identified a potential, expected, or actual problem that adversely impacted the reliability of one or more other Reliability Authorities and the names of the Reliability Authorities that were contacted.

(2) The Compliance Monitor shall also use an annual spot check with 3 business days' notice, or sufficient time to comply with the control center's security access procedure; and investigations upon complaint, to assess performance. The Compliance Monitor shall interview other Reliability Authorities within the Interconnection and verify that the Reliability Authority being audited has been coordinating actions to prevent or resolve potential, expected or actual problems that adversely impact the Interconnection. The results of the spot check shall be assessed and returned to the Reliability Authority within 30 days of the date of the spot check

(3) The Compliance Monitor shall conduct an investigation upon a complaint that is received within 30 days of the alleged infraction's discovery date. The Compliance Monitor shall complete the investigation and report back to all involved Reliability Authorities (the Reliability Authority that complained as well as the Reliability Authority that was investigated) within 45 days after the start of the investigation. The results of the spot check shall be assessed and returned to the Reliability Authority within 30 days of the date of the spot check

(4) The compliance-reset period shall be one calendar year. The reliability authority shall keep auditable documentation for the prior year and current calendar year. The Compliance Monitor shall keep compliance data for a minimum of 3 years or until the Reliability Authority has achieved full compliance — whichever is longer.

(5) The Reliability Authority shall have the following available upon the request of its Compliance Monitor for:

(i) Operating logs or other data sources with the following information for each instance of coordination with another Reliability Authority to agree upon and resolve a potential, expected or actual problem that impacts more than one Reliability Authority Area:

(A) Date and time of information exchanges

(B) Reliability Authority(s) involved in discussion

(C) Description of the reported potential, expected or actual problem

(D) Note to indicate whether problem was agreed upon

(E) Solution identified and agreed upon or a note indicating no solution was agreed upon

(F) Date and time actions taken

(G) Description of actions taken

(H) List of notifications made

(I) Results of any investigation into conflicting system status or studies

Consideration of Comments:
Interviews with other RAs are done to verify self-certification.

The 'spot check' was removed from the standard as being duplicative with the periodic audits.

Most of the format changes were adopted. The compliance monitoring section should have only 3 subsections – the first subsection identifies the method(s) to be used in assessing compliance – the second identifies the reporting period (if there is one) and a performance reset period as well as data retention requirements – the third subsection identifies the evidence or documentation that the Compliance Monitor may ask to see or have demonstrated as part of the compliance assessment process. Adding more subsections wouldn't align with this format, as provided to the SDT by the NERC VP, General Counsel.