

Note – This form is to comment on version 2 of the Coordinate Operations Standard.

The latest version of this Standard (**COORD_OPERATONS_05_02**) is posted on the Standards web site at: <http://www.nerc.com/~filez/standards/Coordinate-Operations.html>

E-mail this form between June 2–July 2, 2004 to: sarcomm@nerc.com with “Comments” in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

Background:

The Coordinate Operations Standard Drafting Team produced this second draft of the Coordinate Operations Standard

The most significant changes to the standard include the following:

Requirement 101 — Procedures, Processes or Plans

1. 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.
2. 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.
3. 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.
4. 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 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Comment Form for 1st Posting of Coordinate Operations Standard

Commenter Information (For Individual Commenters)
Name: John Horakh, 06-29-2004
Organization: MAAC
Industry Segment #: 2
Telephone: 609-625-6014
E-mail: john.horakh@conectiv.com

Key to Industry Segment #'s: 1 – Trans. Owners 2 – RTO's, ISO's, RRC's 3 – LSE's 4 – TDU's 5 - Generators 6 - Brokers, Aggregators, and Marketers 7 - Large Electricity End Users 8 - Small Electricity Users 9 - Federal, State, and Provincial Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)

Name of Group:	Group Chair:	Chair Phone:
	Chair Email:	

List of Group Participants that Support These Comments:

Name	Company	Industry Segment #

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, ‘must’ was changed to ‘should’ to indicate the steps in the procedure ‘should’ be followed.

Operating Procedure: A document that identifies specific steps or tasks that **should ~~must~~** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should ~~must~~** be followed in the order in which they are presented, and should be performed by the position(s) 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.

1. Do you agree with the changes made to the definition of Operating Procedure?

- Yes
 No
 Comments:

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

- Yes
 No
 Comments: **The re-audit requirement is only in Section 103 (d) (1). Shouldn't it also be in Sections 101 (d) and 102 (d) ?**

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

- (ii) Each Reliability Authority's Operating Procedure, Process or Plan that requires one or more other Reliability Authorities to take action (e.g. make notifications, exchange information, or coordinate actions) shall be:
 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a ‘summary of changes’ that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

Yes

No

Comments: **Every three years or more frequently**

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

Yes

No

Comments: **Change the requirement to “Include the date revised or reviewed”. A version control number would only insure that everyone is using the same version. The date should be required, either the date revised or the date reviewed, if no changes were made upon review. With the date, you can tell if the review is being done as required. The date also insures everyone is using the same version.**

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

Yes

No

Comments: **The distribution list indicates how the distribution was made on a particular date. The distribution list may change for subsequent dates.**

8. Do you have any other comments on Requirement 101?

- Yes
 No
 Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
 No
 Comments:

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
 No
 Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of 'agreed upon' conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.
- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.

Comment Form for 2nd Posting of Coordinate Operations Standard

- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
- No
- Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
- No
- Comments:

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
- No
- Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

- Yes
- No
- Comments:

15. Do you agree with the Compliance Monitoring for 103?

- Yes
- No
- Comments:

16. Do you agree with the Levels of Non-compliance for 103?

- Yes
- No
- Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

No

Comments:

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

Comments:

19. Other comments on this standard:

Comments:

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1. 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.
2. 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.
3. 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.
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Requirement 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Comment Form for 1st Posting of Coordinate Operations Standard

Commenter Information (For Individual Commenters)

Name: Raj Rana - Coordinator

Organization: AEP

Industry Segment #: 1,3,6

Telephone: 614-716-2359

E-mail: raj_rana@AEP.com

Key to Industry Segment #'s:

- 1 – Trans. Owners
- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial
Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)

Name of Group:

Group Chair:

Chair Phone:

Chair Email:

List of Group Participants that Support These Comments:

Name	Company	Industry Segment #
Dan Boezio		

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, 'must' was changed to 'should' to indicate the steps in the procedure 'should' be followed.

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1. Do you agree with the changes made to the definition of Operating Procedure?

- Yes
- No
- Comments:

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

- Yes
- No
- Comments: The question implies that this revised language applies to all three sections, but it is only found in Section 103. The 90-day re-audit should apply to all three sections, 101, 102, & 103.

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

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 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

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Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

- Yes
- No
- Comments: Annual review should be required.

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

- Yes
- No
- Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

- Yes
- No
- Comments: Not a big issue could go either way.

8. Do you have any other comments on Requirement 101?

- Yes
 No
 Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
 No
 Comments:

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
 No
 Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

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- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.

Comment Form for 2nd Posting of Coordinate Operations Standard

- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
- No
- Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
- No
- Comments:

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
- No
- Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

- Yes
- No
- Comments:

15. Do you agree with the Compliance Monitoring for 103?

- Yes
- No
- Comments:

16. Do you agree with the Levels of Non-compliance for 103?

- Yes
- No
- Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

No

Comments:

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

Comments: *None that we are aware of.*

19. Other comments on this standard:

Comments:

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5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

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8. 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.

Commenter Information (For Individual Commenters)

Name: Philip Riley

Organization: Public Service Commission of South Carolina

Industry Segment #: 9

Telephone: 803-896-5154

E-mail: philip.riley@psc.state.sc.us

Key to Industry Segment #'s:

- 1 – Trans. Owners
- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
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Comment Form for 1st Posting of Coordinate Operations Standard

STD Commenter Information (For Groups Submitting Group Comments)		
Name of Group: Public Service Commission of South Carolina		Group Chair: Randy Mitchell Chair Phone: 803-896-5260 Chair Email: randy.mitchell@psc.state.sc.us
List of Group Participants that Support These Comments:		
Name	Company	Industry Segment #
Mignon Clyburn	Public Service Commission of South Carolina	9
Elizabeth B. Fleming	Public Service Commission of South Carolina	9
G. O'Neal Hamilton	Public Service Commission of South Carolina	9
John E. Howard	Public Service Commission of South Carolina	9
Randy Mitchell	Public Service Commission of South Carolina	9
C. Robert Moseley	Public Service Commission of South Carolina	9
David A. Wright	Public Service Commission of South Carolina	9

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1. Do you agree with the changes made to the definition of Operating Procedure?

Yes

No

Comments: The PSCSC agrees real-time conditions may vary from expected conditions. We also believe procedures are the consensus best way to do the job. Therefore, if problems arise as a result of procedure non-compliance, we would expect a root-cause analysis to be conducted, with lessons-learned communicated to the appropriate people and fed back into the appropriate procedures.

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

Yes

No

Comments:

Requirement 101

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 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

Yes

No

Comments: The PSCSC believes the important thing is to have assurance that the procedures/processes/plans have been “approved” or “agreed to” and not what the step is called.

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- 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?

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4. Do you agree with this addition to Requirement 101?

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No

Comments:

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5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

- Yes
 No
 Comments:

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

- Yes
 No
 Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

- Yes
 No
 Comments:

8. Do you have any other comments on Requirement 101?

Yes

No

Comments: The PSCSC agrees with the "summary of changes" idea and recommends adding such a requirement to the standard.

9. Do you agree with the Compliance Monitoring for 101?

Yes

No

Comments:

10. Do you agree with the Levels of Non-compliance for 101?

Yes

No

Comments: The PSCSC must reiterate its view that the approach 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.

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of 'agreed upon' conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

Comment Form for 2nd Posting of Coordinate Operations Standard

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.
- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.
- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
- No
- Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
- No
- Comments:

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
- No
- Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

- Yes
- No
- Comments:

15. Do you agree with the Compliance Monitoring for 103?

- Yes
- No
- Comments:

16. Do you agree with the Levels of Non-compliance for 103?

- Yes
- No
- Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

No

Comments:

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

Comments:

19. Other comments on this standard:

Comments:

Note – This form is to comment on version 2 of the Coordinate Operations Standard.

The latest version of this Standard (**COORD_OPERATONS_05_02**) is posted on the Standards web site at: <http://www.nerc.com/~filez/standards/Coordinate-Operations.html>

E-mail this form between June 2–July 2, 2004 to: sarcomm@nerc.com with “Comments” in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

Background:

The Coordinate Operations Standard Drafting Team produced this second draft of the Coordinate Operations Standard

The most significant changes to the standard include the following:

Requirement 101 — Procedures, Processes or Plans

1. 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.
2. 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.
3. 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.
4. 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 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Comment Form for 1st Posting of Coordinate Operations Standard

Commenter Information (For Individual Commenters)

Name: Lynnda Ell

Organization: Entergy Services, Inc.

Industry Segment #: 1

Telephone: 504-310-5880

E-mail: lell@entergy.com

Key to Industry Segment #'s:

- 1 – Trans. Owners
- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial
Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)

Name of Group:

Group Chair:

Chair Phone:

Chair Email:

List of Group Participants that Support These Comments:

Name	Company	Industry Segment #

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, ‘must’ was changed to ‘should’ to indicate the steps in the procedure ‘should’ be followed.

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) 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.

1. Do you agree with the changes made to the definition of Operating Procedure?

- Yes
- No
- Comments:

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

- Yes
- No
- Comments:

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

- (ii) Each Reliability Authority's Operating Procedure, Process or Plan that requires one or more other Reliability Authorities to take action (e.g. make notifications, exchange information, or coordinate actions) shall be:
 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

- Yes
 No
 Comments:

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

- Yes
 No
 Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

- Yes
 No

8. Do you have any other comments on Requirement 101?

Yes

No

Comments: Red lining (or otherwise noting) changes to documents is an important process for complete identification of all changes. This should be a requirement when moving from one version of an approved document to the following version of the document for all changes between the two versions. In order to follow the evolution of a procedure, process or plan, appending a summary of all the changes from version one to the current version would be helpful.

9. Do you agree with the Compliance Monitoring for 101?

Yes

No

Comments:

10. Do you agree with the Levels of Non-compliance for 101?

Yes

No

Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of 'agreed upon' conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.

- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.
- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
- No
- Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
- No
- Comments:

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
- No
- Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

- Yes
- No
- Comments:

15. Do you agree with the Compliance Monitoring for 103?

- Yes
- No
- Comments:

16. Do you agree with the Levels of Non-compliance for 103?

- Yes
- No
- Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

- Yes
- No
- Comments:

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

- Topics:

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

- Comments:

19. Other comments on this standard:

- Comments:

1. The example in the definition of Operating Procedure is incomplete. The definition for Operating Procedure has three basic parts (1) specific task(s) (2) specific goal(s) and (3) specific position(s). The example includes #1 (list of steps) and #2 (remove transmission line) but not #3 (a "position" to perform the task). The example could be changed to read: **"A document that lists the specific steps for a system dispatcher to take in removing a specific transmission line from service is an example of an Operating Procedure."**
2. **Grammar:** The Purpose should be changed as shown: "To ensure that each Reliability Authority's operations are coordinated such that they will not have an adverse impact on the reliability of other Reliability Authorities and to preserve the reliability benefits of interconnected operations."
3. **Consistency:** Only in part 103(a) is the abbreviation "RA" used. This should be changed to be consistent with the remainder of the standard.

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If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

Background:

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The most significant changes to the standard include the following:

Requirement 101 — Procedures, Processes or Plans

1. 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.
2. 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.
3. 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.
4. 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 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Comment Form for 1st Posting of Coordinate Operations Standard

Commenter Information (For Individual Commenters)

Name: Peter Henderson / Khaqan Khan

Organization: Independent Electricity Market Operator (IMO)

Industry Segment #: 2

Telephone: 905-855-6258

E-mail: Peter.Henderson@theIMO.com

Key to Industry Segment #'s:

- 1 – Trans. Owners
- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)

Name of Group:

Group Chair:
Chair Email:

Chair Phone:

List of Group Participants that Support These Comments:

Name	Company	Industry Segment #

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, ‘must’ was changed to ‘should’ to indicate the steps in the procedure ‘should’ be followed.

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) 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.

1. Do you agree with the changes made to the definition of Operating Procedure?

- Yes
- No
- Comments:

The word must is qualified with an additional caveat as outlined below:

Operating Procedure: A document that identifies specific steps or tasks that **must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **must** be followed in the order in which they are presented, and should be performed by the position(s) identified, **unless operating in that exact order is not appropriate for the specific situation**. A document that lists the specific steps to take in removing a specific transmission line from service is an example of an Operating Procedure.

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

- Yes
- No
- Comments:

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

- (ii) Each Reliability Authority's Operating Procedure, Process or Plan that requires one or more other Reliability Authorities to take action (e.g. make notifications, exchange information, or coordinate actions) shall be:
 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

Yes

No

Comments: We also support that the review to be made on a bi-annual basis. A review should/could be made earlier if an RA makes significant changes in their operations that would/could impact this procedure.

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

Yes

No

Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

Yes

No

Comments:

8. Do you have any other comments on Requirement 101?

- Yes
- No
- Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
- No
- Comments:

With regards to standard 101 section d (3), we suggest a change be made to indicate5 **“business”** days.

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
- No
- Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority’s Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of ‘agreed upon’ conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.

Comment Form for 2nd Posting of Coordinate Operations Standard

- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.
- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
- No
- Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
- No
- Comments:

With regards to standard 102 section d (3), we suggest a change be made to indicate5 **"business"** days instead of "5 days"

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
- No
- Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

Yes

No

Comments: Change 103.1.ii.B to the following:

If time does not permit, then each RA shall operate as though the **worse case** problem exists until the conflicting system status is resolved.

15. Do you agree with the Compliance Monitoring for 103?

Yes

No

Comments:

16. Do you agree with the Levels of Non-compliance for 103?

Yes

No

Comments: Distinction between "potential" and "expected" events should be clarified.

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

No

Comments: Only if there are complex or controversial topics that require further explanation.

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

Comments: No

19. Other comments on this standard:

Comments: We support this standard as well as the comments submitted by ISO/RTO Standards Review Committee.

Note – This form is to comment on version 2 of the Coordinate Operations Standard.

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Background:

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1. 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.
2. 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.
3. 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.
4. 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 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Commenter Information (For Individual Commenters)
Name: Joseph C. Fleury
Organization: New York State Reliability Council ("NYSRC")
Industry Segment #2
Telephone: 607-762-4698
E-mail: jcfleury@nyseg.com

- Key to Industry Segment #'s:
- 1 – Trans. Owners
 - 2 – RTO's, ISO's, RRC's
 - 3 – LSE's
 - 4 – TDU's
 - 5 - Generators
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 - 8 - Small Electricity Users
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STD Commenter Information (For Groups Submitting Group Comments)

Name of Group:	Group Chair:	Chair Phone:
	Chair Email:	

List of Group Participants that Support These Comments:

Name	Company	Industry Segment #

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, ‘must’ was changed to ‘should’ to indicate the steps in the procedure ‘should’ be followed.

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) 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.

1. Do you agree with the changes made to the definition of Operating Procedure?

- Yes
- No
- Comments:

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

- Yes
- No
- Comments:

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

- (ii) Each Reliability Authority's Operating Procedure, Process or Plan that requires one or more other Reliability Authorities to take action (e.g. make notifications, exchange information, or coordinate actions) shall be:
 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

- Yes
 No
 Comments:

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

- Yes
 No
 Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

- Yes
 No
 Comments:

8. Do you have any other comments on Requirement 101?

- Yes
- No
- Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
- No
- Comments:

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
- No
- Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of 'agreed upon' conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.
- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.

Comment Form for 2nd Posting of Coordinate Operations Standard

- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
- No
- Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
- No
- Comments:

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
- No
- Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

- Yes
- No
- Comments:

15. Do you agree with the Compliance Monitoring for 103?

- Yes
- No
- Comments:

16. Do you agree with the Levels of Non-compliance for 103?

- Yes
- No
- Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

No

Comments: The NYSRC suggests that the drafting team ensure all the necessary attributes pertaining to this standard appear in the standard and not in any companion document.

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

Comments:

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.

It is the NYSRC's position that (1) NERC specifies minimum standards, (2) a Region may establish more stringent standards for its members separate from the NERC standards, and (3) it is unnecessary to include these more stringent standards within the framework of the NERC standards.

19. Other comments on this standard:

Comments:

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.

Note – This form is to comment on version 2 of the Coordinate Operations Standard.

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E-mail this form between June 2–July 2, 2004 to: sarcomm@nerc.com with “Comments” in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

Background:

The Coordinate Operations Standard Drafting Team produced this second draft of the Coordinate Operations Standard

The most significant changes to the standard include the following:

Requirement 101 — Procedures, Processes or Plans

1. 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.
2. 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.
3. 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.
4. 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 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Commenter Information (For Individual Commenters)

Name:

Organization:

Industry Segment #:

Telephone:

E-mail:

Key to Industry Segment #'s:

- 1 – Trans. Owners
- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial
Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)		
Name of Group:	Group Chair: Chair Email:	Chair Phone:
List of Group Participants that Support These Comments:		
Name	Company	Industry Segment #
Darrick Moe	WAPA	2
John Swanson	Nebraska Public Power District	2
Paul Koskela	Minnesota Power	2
Larry Larson	Otter Tail Power	2
Dick Pursley	Great River Energy	2
Martin Trence	Xcel Energy	2
Todd Gosnell	Omaha Public Power District	2
Robert Coish	Manitoba Hydro	2
Joe Knight	MAPPCOR	2

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, ‘must’ was changed to ‘should’ to indicate the steps in the procedure ‘should’ be followed.

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1. Do you agree with the changes made to the definition of Operating Procedure?

Yes

No

Comments:

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

Yes

No

Comments:

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

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3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
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Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

Yes

No

Comments: Procedures may require updating at any time to reflect changing conditions such as system equipment additions (e.g. new reactive resources available for voltage control). The requirement should be that procedures reflect current system conditions. There should be a Document Change Control Procedure in place to ensure procedures reflect current conditions. An additional periodic review time period should be left up to each RA since different documents may appropriately have different review time periods. Procedures should have a review time period of three years or less.

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

Yes

No

Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

Yes

No

Comment Form for 2nd Posting of Coordinate Operations Standard

Comments: The distribution list could be indicated by a distribution list reference number on some documents to avoid having to produce long lists on every document.

8. Do you have any other comments on Requirement 101?

- Yes
- No
- Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
- No
- Comments:

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
- No
- Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
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The industry comments were in favor of 'agreed upon' conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

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Comment Form for 2nd Posting of Coordinate Operations Standard

- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
- No
- Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
- No
- Comments:

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
- No
- Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

- Yes
- No
- Comments:

15. Do you agree with the Compliance Monitoring for 103?

- Yes
- No
- Comments:

16. Do you agree with the Levels of Non-compliance for 103?

- Yes
- No
- Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

No

Comments:

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

Comments: None

19. Other comments on this standard:

Comments: None

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Organization:

Industry Segment #:

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Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)		
Name of Group: <i>Southern Company Services, Inc</i>		Group Chair: <i>Marc Butts</i> Chair Phone: <i>205-257-4839</i> Chair Email: <i>mmbutts@southernco.com</i>
List of Group Participants that Support These Comments:		
Name	Company	Industry Segment #
<i>Marc Butts</i>	<i>Southern Company Services</i>	<i>1</i>
<i>Raymond Vice</i>	<i>Southern Company Services</i>	<i>1</i>
<i>John Lucas</i>	<i>Southern Company Services</i>	<i>1</i>
<i>Mike Hardy</i>	<i>Southern Company Services</i>	<i>1</i>
<i>Doug McLaughlin</i>	<i>Southern Company Services</i>	<i>1</i>

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Comments:

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No

Comments:

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- No
- Comments:

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Comment Form for 2nd Posting of Coordinate Operations Standard

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5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

- Yes
 No
 Comments:

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

- Yes
 No
 Comments: We recommend that each Procedure, Process or Plan have a version number AND date.

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

- Yes
 No
 Comments: This may be a good practice for some procedures (spanning RA to RA agreements) but should not be a requirement for all procedures.

8. Do you have any other comments on Requirement 101?

- Yes
- No
- Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
- No
- Comments:

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
- No
- Comments: section (e) (1) (i) should not include the phrase “distribution list” (at the end of that paragraph)

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The industry comments were in favor of ‘agreed upon’ conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.

- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.
- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
- No
- Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
- No
- Comments: Formal notifications may need to be documented but not routine communications.

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
- No
- Comments: As written, level 3 appears to be worse than level 4. Maybe rewording would help clarify that violating 4 is more severe than violating 3.

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

Yes

No

Comments: In 103 (a) (1) (iii) we are not exactly sure what the term "more conservative" means. This could be interpreted differently by neighboring RAs.

15. Do you agree with the Compliance Monitoring for 103?

Yes

No

Comments: Not clear how to document which solution is 'more conservative'.

16. Do you agree with the Levels of Non-compliance for 103?

Yes

No

Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

- Yes
- No
- Comments:

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

- Topics:

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

- Comments: We do not currently know of any Regional differences at this time. However, during the initial phasing-in of standards, each region may find adopting or developing a different approach provides increased reliability. Therefore, we believe that differences should be considered as they are identified in the future.

19. Other comments on this standard:

- Comments: We realize that this is a difficult subject to put into words but it does not appear to be a “crisp” standard as has been the recent buzzword regarding standards.

Comment Form for 2nd Posting of Coordinate Operations Standard

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The latest version of this Standard (**COORD_OPERATIONS_05_02**) is posted on the Standards web site at: <http://www.nerc.com/~filez/standards/Coordinate-Operations.html>

E-mail this form between June 2–July 2, 2004 to: sarcomm@nerc.com with “Comments” in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

Background:

The Coordinate Operations Standard Drafting Team produced this second draft of the Coordinate Operations Standard

The most significant changes to the standard include the following:

Requirement 101 — Procedures, Processes or Plans

1. 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.
2. 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.
3. 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.
4. 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 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Commenter Information (For Individual Commenters)

Name: Patti Metro on behalf of FRCC members

Organization: FRCC

Industry Segment #:

Telephone: (813) 289-5644

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Key to Industry Segment #'s:

- 1 – Trans. Owners
- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial
Regulatory or other Govt. Entities

Comment Form for 2nd Posting of Coordinate Operations Standard

STD Commenter Information (For Groups Submitting Group Comments)

Name of Group: FRCC

Group Chair:
Chair Email:

Chair Phone:

List of Group Participants that Support These Comments:

Name	Company	Industry Segment #
<i>Linda Campbell</i>	<i>FRCC</i>	<i>2</i>
<i>Patti Metro</i>	<i>FRCC</i>	<i>2</i>
<i>Bernie Budnik</i>	<i>Reedy Creek Improvement District</i>	<i>3</i>
<i>John Giddens</i>	<i>Reedy Creek Improvement District</i>	<i>3</i>
<i>Ray Crooks</i>	<i>Reedy Creek Improvement District</i>	<i>6</i>
<i>Wendell Payne</i>	<i>FPL</i>	<i>1</i>
<i>Pedro Modia</i>	<i>FPL</i>	<i>1</i>
<i>Mark Bennett</i>	<i>Gainesville Regional Utilities</i>	<i>3</i>
<i>Tom Washburn</i>	<i>Orlando Utilities Commission</i>	<i>3</i>
<i>Tom Calabro</i>	<i>Orlando Utilities Commission</i>	<i>3</i>
<i>Joe Krupar</i>	<i>Florida Municipal Power Agency</i>	<i>3</i>
<i>Bob Remly</i>	<i>Clay Electric Cooperative</i>	<i>3</i>
<i>Paul Elwing</i>	<i>Lakeland Electric</i>	<i>3</i>
<i>Amy Long</i>	<i>Lakeland Electric</i>	<i>1</i>
<i>Richard Gilbert</i>	<i>Lakeland Electric</i>	<i>3</i>
<i>Steve Wallace</i>	<i>Seminole Electric Cooperative</i>	<i>4</i>
<i>Ted Hobson</i>	<i>JEA</i>	<i>1</i>
<i>Joe Roos</i>	<i>Ocala Electric Utility</i>	<i>3</i>
<i>Alan Gale</i>	<i>City of Tallahassee</i>	<i>5</i>
<i>Preston Pierce</i>	<i>Progress Energy Florida</i>	<i>1</i>

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, ‘must’ was changed to ‘should’ to indicate the steps in the procedure ‘should’ be followed.

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) 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.

1. Do you agree with the changes made to the definition of Operating Procedure?

- Yes
- No
- Comments:

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

- Yes
- No

Comments: The statement above implies that the 90-day re-audit requirement until an entity is fully compliant is used throughout the standard, but is actually only written in Requirement 103. We are not sure what re-auditing every 90 days really accomplishes, and in fact, puts more of a burden on the auditors rather than the non-compliant RA. The levels of non-compliance should be clear enough so that disclosure of non-compliance under the new Disclosure Guidelines will provide the correct incentive to not continue operating in a non-compliant manner. In addition, the NERC Compliance and Certification Committee (CCC) should develop the appropriate sanctions and penalties for the identified levels of non-compliance.

Also, the Compliance Monitoring sections for Requirements 101, 102, and 103 still have inconsistent formatting. Formatting recommendations are provided in our following comments.

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

- (ii) Each Reliability Authority's Operating Procedure, Process or Plan that requires one or more other Reliability Authorities to take action (e.g. make notifications, exchange information, or coordinate actions) shall be:
 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

- Yes
 No
 Comments:

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

- Yes
 No
 Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

- Yes
 No
 Comments:

8. Do you have any other comments on Requirement 101?

Yes

No

Comments:

General Questions/Comments:

- Requirements (a)(1) states that "... Operating Procedures, Processes or Plans shall address Scenarios that affect other Reliability Authority Areas as well as those developed in coordination with other Reliability Authorities..." What if a Reliability Authority does not know a scenario affects another Reliability Authority? Should there be a process in-place to communicate a new condition that occurs or is this the intention of Requirement 103?
- Measures (b)(1)(i) – the listing of these items (A-F) should not be included since the measure is that the Reliability Authority has provided for real-time use the latest approved version of the Operating Procedures, Processes, or Plans and the items in (b)(1)(i) are already identified in the requirements portion of 101.
- Measures (b)(1)(ii) – "... The Reliability Authority shall have evidence that these Operating Procedures, Processes or Plans were..." For clarity, examples of the type of evidence should be provided. Possibly, documentation of agreement date and the distribution date.

Based on our comments above we recommended the reformatting of (a)(1)(i) and (a)(2) for clarity as follows:

(a)(1) The Reliability Authority shall have Operating Procedures, Processes, or Plans in place for activities that require notification, exchange of information or coordination of actions with one or more other Reliability Authorities to support interconnection reliability. These Operating Procedures, Processes or Plans shall address Scenarios that affect other Reliability Authority Areas as well as those developed in coordination with other Reliability Authorities.

- (i) These shall collectively address, as a minimum, the following:
 - A) Communications and notifications under which one Reliability Authority notifies other Reliability Authorities including the process to follow in making those notifications; and the data and information to be exchanged with other Reliability Authorities.
 - B) Coordination of information exchange to support reliability assessments.
 - C) Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

Examples of Scenarios that require Operating Procedures, Processes, or Plans include but are not limited to:

- A) Sabotage attacks
- B) IROL violations
- C) Energy and capacity shortages
- D) Planned or unplanned outage information
- E) Voltage control, including the coordination of reactive resources for voltage control

Comment Form for 2nd Posting of Coordinate Operations Standard

- (a) (2) A Reliability Authority's Operating Procedures, Processes or Plans developed to support another Reliability Authority's Operating Procedure, Process or Plan shall include:
- (i) A reference to the other Reliability Authority's Operating Procedure, Process or Plan.
 - (ii) The agreed-upon actions from the other Reliability Authority's Operating Procedure, Process or Plan.

We also recommend reformatting of (b)(2) for clarity and elimination of duplicate information that is already covered in (b)(1) to:

- (b)(2) The Reliability Authority's Operating Procedures, Processes or Plans developed (for its system operators' internal use) to support another Reliability Authority's Operating Procedure, Process or Plan shall:
- (i) Include a reference to the associated source document, and
 - (ii) Support the agreed-upon actions from the source document. *(What is meant by "support"? The word support can have different meanings to different people. This should be clear.)*

9. Do you agree with the Compliance Monitoring for 101?

Yes

No

Comments: We recommend the reformatting of section (d)(1) for clarity and consistency as follows:


- (i) The Reliability Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually. The self-certification shall include a list of the latest approved version of documents distributed to other Reliability Authorities that require notifications, information exchange or the coordination of actions between Reliability Authorities or that addresses Scenarios in the Reliability Authority Area that may impact other Reliability Authority Areas.
- (ii) 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 to 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 Compliance Monitor shall conduct an investigation upon a complaint 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.

10. Do you agree with the Levels of Non-compliance for 101?

Yes

No

Comments:

In (i) for Level One should include the word “a” as indicated “...to support interconnection reliability do not include  version control number or date, and a distribution list, or ...”

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority’s Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of ‘agreed upon’ conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.
- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.
- There wasn’t a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

Yes

No

Comments:

We have no trouble with the idea of weekly conference calls. However, conference calls with an adjacent Reliability Authority may be handled with a normal everyday phone. We are not sure what kind of testing this would need. If the conference call is intended to utilize some other system such as a conference bridge, hotline, satellite phone or other communication forum as mentioned, then this weekly testing may be very important. Does there need to be some further clarification of what is really meant?

Comment Form for 2nd Posting of Coordinate Operations Standard

In Measure (b)(4), "... the Reliability Authority shall provide the Compliance Monitor with evidence that the requested reliability related information was provided to other Reliability Authorities..." For clarity, examples of the type of evidence should be provided.

12. Do you agree with the Compliance Monitoring for 102?

Yes

No

Comments: We recommend the reformatting of section (d)(1) for clarity and consistency as follows:

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

(ii) The Compliance Monitor shall also use a scheduled on-site review at least once every three years and investigations upon complaint. 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.

(iii) The Compliance Monitor shall conduct an investigation upon a complaint 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.

13. Do you agree with the Levels of Non-compliance for 102?

Yes

No

Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

Yes

No

Comments:

The changes to this requirement are more clear than the 1st Posting of the Standard, but now more clarity must be provided in which entity determines which approach is "more conservative". What is conservative for one system, may not be conservative for the other.

In addition, for clarity, we recommend revising Requirement (a)(1)(i) as follows: If the involved Reliability Authorities agree on the problem and the actions to take to prevent or mitigate the system condition each involved Reliability Authority shall implement the agreed-upon solution, and notify the involved Reliability Authorities **upon completion of the actions.**

15. Do you agree with the Compliance Monitoring for 103?

Yes

No

Comments: We recommend the reformatting of section (d)(1) for clarity and consistency as follows:

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

(ii) The Compliance Monitor shall 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 coordinating actions to prevent or resolve potential, expected or actual problems that adversely impact the Interconnection.

(iii) The Compliance Monitor shall conduct an investigation upon a complaint that is received within 30 days of an 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.

See our comment in the beginning of this form. We did not include the last sentence "Entities found non-compliant shall be subject to re-audit every 90 days until found fully compliant" since we do not think it is appropriate.

16. Do you agree with the Levels of Non-compliance for 103?

Yes

No

Comments:

The levels of non-compliance need to be more specific to the requirements and measures. The levels as written are too broad. Perhaps Level 1 could be they did not notify upon completion of actions. Level 2 could still be N/A. Level 3 could be they did not operate as if the problem existed until a conflict was resolved. And Level 4 could be they did not operate to the most reliable (conservative) state when they could not agree.

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

No

Comments:

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

Comment Form for 2nd Posting of Coordinate Operations Standard

■ Comments: We are not aware of any Regional or Interconnection Differences that should be added to this standard.

19. Other comments on this standard:

■ Comments:

We continue to have the concern that this Standard only applies to coordination between RA's. We have commented on this in previous postings, and the consideration to the comments state that there is not industry consensus to address all coordination. However, the drafting team stated they have advised the OC on the possible need for additional SARs to address coordination between other entities. Is the drafting team convinced there is industry consensus to limit to RA's only? We saw other commenters on the last posting with the same concern? At the very least, it would seem that the Operating Procedures, Processes and Plans of the RA should be required to describe the relationships and coordination role with not just other RA's, but the BA's, TOP's, TP's, IA's and PA's relevant to the RA's footprint.

We also offer to following comments noted below. These are excerpts from the Standard with questions/comments provided in italics

Purpose: To ensure that each Reliability Authority's operations are coordinated such that they will not have an adverse impact on the reliability of other Reliability Authority and to preserve the reliability benefits of interconnected operations.

Shouldn't the purpose be the reliability of the Reliability Authority's area not the reliability of the Reliability Authority? If this is correct the purpose should be revised as follows: "...on the reliability of other Reliability Authority Areas and to preserve ..."

Applicability: This standard applies to entities performing the Reliability Authority function, as identified in NERC's Functional Model. NERC is now developing standards and procedures for the identification and certification of such entities. Until that identification and certification is complete, these standards apply to the existing entities (such as control areas and reliability coordinators) that are currently performing the defined functions.

In Version 2 of the Functional Model approved by the NERC BOT in February 2004, the Reliability Authority is the entity that is performing the Operating Reliability Function. Therefore the applicability portion of the standard should be revised to reflect this change.

In this standard, the term "Reliability Authority" refers to the entities performing this function as defined in the Functional Model.

Since this statement is redundant with the first sentence of the Applicability portion of the standard it can be deleted.

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2. 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.
3. 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.
4. 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 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Commenter Information (For Individual Commenters)

Name:

Organization:

Industry Segment #:

Telephone:

E-mail:

Key to Industry Segment #'s:

- 1 – Trans. Owners
- 2 – RTO's, ISO's, RRC's
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- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial
Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)		
Name of Group: <i>Southern Company Generation & Energy Marketing (SCGEM)</i>		Group Chair: <i>Roman Carter</i> Chair Phone: <i>205-257-6027</i> Chair Email: <i>jrcarter@southernco.com</i>
List of Group Participants that Support These Comments:		
Name	Company	Industry Segment #
Roman Carter	SCGEM	6
Joel Dison	SCGEM	6
Tony Reed	SCGEM	6
Lucius Burris	SCGEM	6
Clifford Shepard	SCGEM	6
Roger Green	Southern Generation	5

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, ‘must’ was changed to ‘should’ to indicate the steps in the procedure ‘should’ be followed.

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) 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.

1. Do you agree with the changes made to the definition of Operating Procedure?

Yes

No

Comments:

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

Yes

No

Comments:

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

- (ii) Each Reliability Authority's Operating Procedure, Process or Plan that requires one or more other Reliability Authorities to take action (e.g. make notifications, exchange information, or coordinate actions) shall be:
 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

- Yes
- No
- Comments:

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

- Yes
- No
- Comments: We recommend that each Procedure, Process or Plan have a version number AND date.

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

- Yes
- No
- Comments: This may be a good practice for some procedures (spanning RA to RA agreements) but should not be a requirement for all procedures.

8. Do you have any other comments on Requirement 101?

- Yes
- No
- Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
- No
- Comments:

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
- No
- Comments: section (e) (1) (i) should not include the phrase “distribution list” (at the end of that paragraph)

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority’s Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of ‘agreed upon’ conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.

- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.
- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
- No
- Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
- No

X Comments: Formal notifications to reveal a particular event may need to be documented but not routine communications in which system has no abnormalities.

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
- No

Comments: As written, level 3 appears to be worse than level 4. Maybe rewording would help clarify that violating 4 is more severe than violating 3.

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

Yes

No

Comments: In 103 (a) (1) (iii) we are not exactly sure what the term "more conservative" means. This could be interpreted differently by neighboring RAs.

15. Do you agree with the Compliance Monitoring for 103?

Yes

No

Comments: Not clear how to document which solution is 'more conservative'.

16. Do you agree with the Levels of Non-compliance for 103?

Yes

No

Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

- Yes
- No
- Comments:

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

- Topics:

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

- Comments: We do not currently know of any Regional differences at this time. However, during the initial phasing-in of standards, each region may find adopting or developing a different approach provides increased reliability. Therefore, we believe that differences should be considered as they are identified in the future.

19. Other comments on this standard:

Comments:

Note – This form is to comment on version 2 of the Coordinate Operations Standard.

The latest version of this Standard (**COORD_OPERATIONS_05_02**) is posted on the Standards web site at: <http://www.nerc.com/~filez/standards/Coordinate-Operations.html>

E-mail this form between June 2–July 2, 2004 to: sarcomm@nerc.com with “Comments” in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

Background:

The Coordinate Operations Standard Drafting Team produced this second draft of the Coordinate Operations Standard

The most significant changes to the standard include the following:

Requirement 101 — Procedures, Processes or Plans

1. 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.
2. 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.
3. 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.
4. 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 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Comment Form for 1st Posting of Coordinate Operations Standard

Commenter Information (For Individual Commenters)
Name: Gerald Rheault
Organization: Manitoba Hydro
Industry Segment #: 1,3,5,6
Telephone: 204-487-5423
E-mail: gnrrheault@hydro.mb.ca

Key to Industry Segment #'s: 1 – Trans. Owners 2 – RTO's, ISO's, RRC's 3 – LSE's 4 – TDU's 5 - Generators 6 - Brokers, Aggregators, and Marketers 7 - Large Electricity End Users 8 - Small Electricity Users 9 - Federal, State, and Provincial Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)

Name of Group:	Group Chair:	Chair Phone:
	Chair Email:	

List of Group Participants that Support These Comments:

Name	Company	Industry Segment #

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, 'must' was changed to 'should' to indicate the steps in the procedure 'should' be followed.

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) 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.

1. Do you agree with the changes made to the definition of Operating Procedure?

- Yes
- No
- Comments:

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

- Yes
- No
- Comments: Any entity which is found non-compliant should be required to prepare a mitigation plan indicating how and when he will take the steps required to become compliant. If this mitigation plan defines a plan and timelines which are unacceptable to the compliance monitor the entity should be required to modify his mitigation plan to meet the expectations of the compliance monitor. This exercise should adequately address the concerns raised above and resolve the problem.

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

- (ii) Each Reliability Authority's Operating Procedure, Process or Plan that requires one or more other Reliability Authorities to take action (e.g. make notifications, exchange information, or coordinate actions) shall be:
 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments: The “Authority” identified in this above statement should be defined in the Agreement to be developed by the RAs with each other as part of the Certification requirements.

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

- Yes
 No
 Comments:

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

- Yes
 No
 Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

- Yes
 No
 Comments:

8. Do you have any other comments on Requirement 101?

- Yes
 No
 Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
 No
 Comments:

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
 No
 Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of 'agreed upon' conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.
- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.

- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

Yes

No

Comments: Daily calls could be a burden on the operators but it definitely would be desirable that there be a call once a week at the very least and more frequently if agreed to by all RAs involved..

12. Do you agree with the Compliance Monitoring for 102?

Yes

No

Comments:

13. Do you agree with the Levels of Non-compliance for 102?

Yes

No

Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

- Yes
- No
- Comments:

15. Do you agree with the Compliance Monitoring for 103?

- Yes
- No

Comments: A comment relative to "re-audit every 90 days" contained in question 2 is applicable to this compliance monitoring process. If the entity which was judged non-compliant does not improve, a further complaint will be filed triggering a new investigation. Therefore requiring 90 day review is not necessary.

16. Do you agree with the Levels of Non-compliance for 103?

- Yes
- No
- Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

No

Comments: This Standard is primarily of an administrative nature therefore a technical reference would not serve a useful purpose.

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

Comments: There are no Regional or Interconnection Differences that should be added to this Standard that Manitoba Hydro is aware of.

19. Other comments on this standard:

Comments:

Note – This form is to comment on version 2 of the Coordinate Operations Standard.

The latest version of this Standard (**COORD_OPERATIONS_05_02**) is posted on the Standards web site at: <http://www.nerc.com/~filez/standards/Coordinate-Operations.html>

E-mail this form between June 2–July 2, 2004 to: sarcomm@nerc.com with “Comments” in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

Background:

The Coordinate Operations Standard Drafting Team produced this second draft of the Coordinate Operations Standard

The most significant changes to the standard include the following:

Requirement 101 — Procedures, Processes or Plans

1. 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.
2. 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.
3. 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.
4. 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 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Commenter Information (For Individual Commenters)

Name: Michael C. Calimano

Organization: New York ISO

Industry Segment #: 2

Telephone: 518-356-6129

E-mail: mcalimano@nyiso.com

Key to Industry Segment #'s:

- 1 – Trans. Owners
- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial
Regulatory or other Govt. Entities

Comment Form for 1st Posting of Coordinate Operations Standard

STD Commenter Information (For Groups Submitting Group Comments)		
Name of Group: New York ISO	Group Chair: Michael C. Calimano	
	Chair Phone:	
	Chair Email:	
List of Group Participants that Support These Comments:		
Name	Company	Industry Segment #

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, ‘must’ was changed to ‘should’ to indicate the steps in the procedure ‘should’ be followed.

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) 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.

1. Do you agree with the changes made to the definition of Operating Procedure?

Yes

No

Comments:

The word 'must' is preferred. Operating Procedures must be followed

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

Yes

No

Comments:

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

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 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

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- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

Yes

No

Comments: A review should be made when an RA makes changes in their operations that would affect a procedure.

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

Yes

No

Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

Yes

No

Comments:

8. Do you have any other comments on Requirement 101?

- Yes
- No
- Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
- No
- Comments: Item (d) 3 should state "5 business days" instead of "5 days".

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
- No
- Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of 'agreed upon' conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.
- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.

Comment Form for 2nd Posting of Coordinate Operations Standard

- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
 No
 Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
 No
 Comments: Item (d) 3 should state "5 business days" instead of "5 days".

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
 No
 Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

Yes

No

Comments: Change 103.1.ii.B to the following:

If time does not permit, then each RA shall operate as though the **worse case** problem exists until the conflicting system status is resolved.

15. Do you agree with the Compliance Monitoring for 103?

Yes

No

Comments:

16. Do you agree with the Levels of Non-compliance for 103?

Yes

No

Comments:

The explanation of Level 1 needs to be clearer to indicate that the coordination activity was completed but the documentation was not.

A distinction between "potential" and "expected" events needs to be defined.

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

- Yes
- No
- Comments

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

Comments:

19. Other comments on this standard:

Comments:

Note – This form is to comment on version 2 of the Coordinate Operations Standard.

The latest version of this Standard (**COORD_OPERATIONS_05_02**) is posted on the Standards web site at: <http://www.nerc.com/~filez/standards/Coordinate-Operations.html>

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If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

Background:

The Coordinate Operations Standard Drafting Team produced this second draft of the Coordinate Operations Standard

The most significant changes to the standard include the following:

Requirement 101 — Procedures, Processes or Plans

1. 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.
2. 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.
3. 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.
4. 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 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Commenter Information (For Individual Commenters)

Name: Ed Riley
Organization: California ISO
Industry Segment #: 2
Telephone: (916) 351-4463
E-mail: eriley@caiso.com

Key to Industry Segment #'s:

- 1 – Trans. Owners
- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)

Name of Group:	Group Chair:	Chair Phone:
	Chair Email:	

List of Group Participants that Support These Comments:

Name	Company	Industry Segment #

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, ‘must’ was changed to ‘should’ to indicate the steps in the procedure ‘should’ be followed.

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) 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.

1. Do you agree with the changes made to the definition of Operating Procedure?

Yes

No

Comments: *The word “must” is preferred over the word “shall”. Operating Procedures need to be followed and in most cases in a specific order presented in the procedure. A qualifier can be added to the definition that allows the operator to vary from the procedure as warranted by system conditions.*

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

Yes

No

Comments:

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

- (ii) Each Reliability Authority's Operating Procedure, Process or Plan that requires one or more other Reliability Authorities to take action (e.g. make notifications, exchange information, or coordinate actions) shall be:
 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from 'approve' to 'agree to'?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control

room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

Yes

No

Comments: *Three years is too long of a review cycle. We recommend review on an annual basis or if an RA has a change in their operations or system that would impact any procedures.*

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

Yes

No

Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

Yes

No

Comments:

8. Do you have any other comments on Requirement 101?

- Yes
- No
- Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
- No
- Comments:

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
- No
- Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of 'agreed upon' conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.
- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.

- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

Yes

No

Comments: *Conference calls should be daily and conducted by the real-time personnel that would be using conference calls to notify other RA's of adverse system conditions.*

12. Do you agree with the Compliance Monitoring for 102?

Yes

No

Comments:

13. Do you agree with the Levels of Non-compliance for 102?

Yes

No

Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

Yes

No

Comments:

15. Do you agree with the Compliance Monitoring for 103?

Yes

No

Comments:

16. Do you agree with the Levels of Non-compliance for 103?

Yes

No

Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

No

Comments:

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

Comments:

19. Other comments on this standard:

Comments:

Note – This form is to comment on version 2 of the Coordinate Operations Standard.

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Requirement 102 — Notifications and Information Exchange

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Requirement 103 — Coordination

6. 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.
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8. 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.

Commenter Information (For Individual Commenters)

Name:

Organization: ISO / RTO Council

Industry Segment #: 2

Telephone:

E-mail:

Key to Industry Segment #'s:

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- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial
Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)		
Name of Group: ISO/RTO Council Standards Review Committee		Group Chair: Karl Tammar Chair Phone: 518-356-6205 Chair Email: ktammar@nyiso.com
List of Group Participants that Support These Comments:		
Name	Company	Industry Segment #
Dale McMaster	AESO	2
Ed Riley	CAISO	2
Sam Jones	ERCOT	2
Don Tench	IMO	2
Peter Brandien	ISO-NE	2
Bill Phillips	MISO	2
Karl Tammar	NYISO	2
Bruce Balmat	PJM	2
Carl Monroe	SPP	2

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, ‘must’ was changed to ‘should’ to indicate the steps in the procedure ‘should’ be followed.

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) 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.

1. Do you agree with the changes made to the definition of Operating Procedure?

Yes

No

Comments:

The word must is preferred but with the additional caveat added. See below:

Operating Procedure: A document that identifies specific steps or tasks that **must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **must** be followed in the order in which they are presented, and should be performed by the position(s) identified, **unless operating in that exact order is not appropriate for the specific situation**. A document that lists the specific steps to take in removing a specific transmission line from service is an example of an Operating Procedure.

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

Yes

No

Comments:

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

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 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

Yes

No

Comments: A review shall be made earlier if an RA makes changes in their operations that would impact a procedure.

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

Yes

No

Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

Yes

No

Comments:

8. Do you have any other comments on Requirement 101?

- Yes
 No
 Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
 No
 Comments: Item (d) 3 should state "5 business days" instead of "5 days".

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
 No
 Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of 'agreed upon' conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

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- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.

Comment Form for 2nd Posting of Coordinate Operations Standard

- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
- No
- Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
- No
- Comments: Item (d) 3 should state "5 business days" instead of "5 days".

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
- No
- Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

Yes

No

Comments: Change 103.1.ii.B to the following:

If time does not permit, then each RA shall operate as though the **worse case** problem exists until the conflicting system status is resolved.

15. Do you agree with the Compliance Monitoring for 103?

Yes

No

Comments:

16. Do you agree with the Levels of Non-compliance for 103?

Yes

No

Comments:

The explanation of Level 1 needs to be clearer to indicate that the coordination activity was completed but the documentation was not.

A distinction between "potential" and "expected" events needs to be defined.

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

- Yes
- No
- Comments

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

Comments:

19. Other comments on this standard:

Comments:

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Requirement 103 — Coordination

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

Comment Form for 1st Posting of Coordinate Operations Standard

Commenter Information (For Individual Commenters)	
Name: Peter Burke [on behalf of ATC's Jason Shaver]	
Organization: American Transmission Co.	
Industry Segment #: 1	
Telephone: 262-506-6863	
E-mail: PBurke@atcllc.com	

- | |
|--|
| <p>Key to Industry Segment #'s:</p> <ul style="list-style-type: none"> 1 – Trans. Owners 2 – RTO's, ISO's, RRC's 3 – LSE's 4 – TDU's 5 - Generators 6 - Brokers, Aggregators, and Marketers 7 - Large Electricity End Users 8 - Small Electricity Users 9 - Federal, State, and Provincial Regulatory or other Govt. Entities |
|--|

STD Commenter Information (For Groups Submitting Group Comments)		
Name of Group:	Group Chair:	Chair Phone:
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List of Group Participants that Support These Comments:		
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1. Do you agree with the changes made to the definition of Operating Procedure?

- Yes
- No
- Comments:

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Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

- Yes
- No
- Comments:

Requirement 101

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- Yes
- No
- Comments:

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4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

Comment Form for 2nd Posting of Coordinate Operations Standard

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5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

- Yes
 No
 Comments:

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

- Yes
 No
 Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

- Yes
 No
 Comments:

8. Do you have any other comments on Requirement 101?

- Yes
- No
- Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
- No
- Comments:

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
- No
- Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of 'agreed upon' conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.
- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.

Comment Form for 2nd Posting of Coordinate Operations Standard

- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
- No
- Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
- No
- Comments:

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
- No
- Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

- Yes
- No
- Comments:

15. Do you agree with the Compliance Monitoring for 103?

- Yes
- No
- Comments:

16. Do you agree with the Levels of Non-compliance for 103?

- Yes
- No
- Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

No

Comments: This standard in its existing draft has been written in a way that a technical reference is not required.

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

Comments: Not aware of any regional or interconnection differences.

19. Other comments on this standard:

Comments:

Note – This form is to comment on version 2 of the Coordinate Operations Standard.

The latest version of this Standard (**COORD_OPERATIONS_05_02**) is posted on the Standards web site at: <http://www.nerc.com/~filez/standards/Coordinate-Operations.html>

E-mail this form between June 2–July 2, 2004 to: sarcomm@nerc.com with “Comments” in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

Background:

The Coordinate Operations Standard Drafting Team produced this second draft of the Coordinate Operations Standard

The most significant changes to the standard include the following:

Requirement 101 — Procedures, Processes or Plans

1. 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.
2. 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.
3. 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.
4. 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 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Comment Form for 1st Posting of Coordinate Operations Standard

Commenter Information (For Individual Commenters)	
Name:	Kathleen Goodman
Organization:	ISO New England
Industry Segment #:	2
Telephone:	(413) 535-4111
E-mail:	kgoodman@iso-ne.com

Key to Industry Segment #'s:

- 1 – Trans. Owners
- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)	
Name of Group:	Group Chair:
	Chair Phone:
	Chair Email:

List of Group Participants that Support These Comments:		
Name	Company	Industry Segment #

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) 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.

time, the word, 'must' was changed to 'should' to indicate the steps in the procedure 'should' be followed.

1. Do you agree with the changes made to the definition of Operating Procedure?

- Yes
- No
- Comments:

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

- Yes
- No
- Comments:

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

- (ii) Each Reliability Authority's Operating Procedure, Process or Plan that requires one or more other Reliability Authorities to take action (e.g. make notifications, exchange information, or coordinate actions) shall be:
 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

- Yes
 No
 Comments:

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

- Yes
 No
 Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

- Yes
 No
 Comments:

8. Do you have any other comments on Requirement 101?

- Yes
- No
- Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
- No
- Comments:

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
- No
- Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of 'agreed upon' conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.
- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.

Comment Form for 2nd Posting of Coordinate Operations Standard

- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
- No
- Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
- No
- Comments:

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
- No
- Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

- Yes
- No
- Comments:

15. Do you agree with the Compliance Monitoring for 103?

- Yes
- No
- Comments:

16. Do you agree with the Levels of Non-compliance for 103?

- Yes
- No
- Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

No

Comments: ISO-NE strongly suggests that the drafting team ensure all the necessary attributes pertaining to this standard appear in the standard and not in any companion document.

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

Comments:

19. Other comments on this standard:

Comments:

We support Mr. Gent's comments to the NERC BOT that monetary sanctions are ineffective to ensure compliance and that market mechanisms and letters of increasing severity are more effective.

There is an issue with the concept of inclusion of a monetary sanction matrix and what its implications are. ISO-NE 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, may not be supported. There are, however, proceedings at NERC by the Compliance Certification Committee (CCC) to address alternative sanction proposals and we will continue to work to oppose monetary sanctions.

The NPCC Compliance Sanction Alternative study provides evidence that supports the above.

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E-mail this form between June 2–July 2, 2004 to: sarcomm@nerc.com with “Comments” in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

Background:

The Coordinate Operations Standard Drafting Team produced this second draft of the Coordinate Operations Standard

The most significant changes to the standard include the following:

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1. 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.
2. 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.
3. 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.
4. 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 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Comment Form for 1st Posting of Coordinate Operations Standard

Commenter Information (For Individual Commenters)
Name: Darrel W. Richardson
Organization: Illinois Power Company
Industry Segment #: 1 & 3
Telephone: 217.424.6536
E-mail: darrel_richardson@illinoispower.com

Key to Industry Segment #'s:

- 1 – Trans. Owners
- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
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- 9 - Federal, State, and Provincial Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)

Name of Group:	Group Chair:	Chair Phone:
	Chair Email:	

List of Group Participants that Support These Comments:

Name	Company	Industry Segment #

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, ‘must’ was changed to ‘should’ to indicate the steps in the procedure ‘should’ be followed.

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) 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.

1. Do you agree with the changes made to the definition of Operating Procedure?

- Yes
- No
- Comments:

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

- Yes
- No
- Comments: However, this would seem to put an unnecessary burden on the Audit Team. It would seem that stiffer monetary penalties or threat of de-certification would have more impact.

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

- (ii) Each Reliability Authority's Operating Procedure, Process or Plan that requires one or more other Reliability Authorities to take action (e.g. make notifications, exchange information, or coordinate actions) shall be:
 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

Yes

No

Comments:

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

Yes

No

X Comments: However, we are not sure of the value of the version control number or date unless two documents happen to be side-by-side. If an operator only has one document in front of them, how does this ensure the operator has the latest version.

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

Yes

No

Comments:

8. Do you have any other comments on Requirement 101?

- Yes
 No
 Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
 No
 Comments:

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
 No
 Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of 'agreed upon' conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.
- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.

- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

Yes

No

X Comments: We agree with the intent but think that there should be something that would trigger calls on a more often basis (i.e., weather/temperature, reserve margin level, etc).

12. Do you agree with the Compliance Monitoring for 102?

Yes

No

Comments:

13. Do you agree with the Levels of Non-compliance for 102?

Yes

No

X Comments: However, it would seem that there should be some "forgiveness" when non-participation occurs due to emergency situations.

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

Yes

No

X Comments: However, we believe that a step should be added in between 103 (a) (1) (ii) (A) and 103 (a) (1) (ii) (B). The step would read "If the RA contending there is a problem has a reasonable solution which does not require the action of the RA disagreeing a problem exists, the RA contending the problem exists will implement this solution". The present 103 (a) (1) (ii) (B) should become 103 (a) (1) (ii) (C) and read "If the RA contending a problem exists has no solution which does not require the actions of the disagreeing RA or has already taken all reasonable actions to resolve the problem themselves, then each RA shall operate as though the problem exists until the conflicting system status is resolved".

15. Do you agree with the Compliance Monitoring for 103?

Yes

No

Comments:

16. Do you agree with the Levels of Non-compliance for 103?

Yes

No

Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

X No

Comments:

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

X Comments: No.

19. Other comments on this standard:

Comments:

Note – This form is to comment on version 2 of the Coordinate Operations Standard.

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If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

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Requirement 102 — Notifications and Information Exchange

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8. 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.

Commenter Information (For Individual Commenters)

Name:

Organization:

Industry Segment #:

Telephone:

E-mail:

Key to Industry Segment #'s:

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- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial
Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)		
Name of Group: Operating Reliability Working Group (ORWG) Southwest Power Pool		Group Chair: Scott Moore Chair Phone: 614-716-6600 Chair Email: spmoore@aep.com
List of Group Participants that Support These Comments:		
Name	Company	Industry Segment #
Mike Gammon	KCPL	1
Jason Smith	Entergy	1
Nat Stephens	Entergy	1
Jerry Stout	Entergy	1
Robert Rhodes	SPP	2

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, ‘must’ was changed to ‘should’ to indicate the steps in the procedure ‘should’ be followed.

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) 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.

1. Do you agree with the changes made to the definition of Operating Procedure?

Yes

No

Comments:

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

Yes

No

Comments:

The question implies that the revision applies to all three sections of the standard but the 90-day re-audit is only referenced in Section 103. The 90-day re-audit revision should apply equally to all three sections of the standard.

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

- (ii) Each Reliability Authority's Operating Procedure, Process or Plan that requires one or more other Reliability Authorities to take action (e.g. make notifications, exchange information, or coordinate actions) shall be:
 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

- Yes
- No
- Comments:

A review period of at least annually would be much more appropriate.

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

- Yes
- No
- Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

- Yes
- No
- Comments:

8. Do you have any other comments on Requirement 101?

Yes

No

Comments:

The last sentence in (a)(1) seems redundant. Isn't scenarios that affect other RA Areas basically the same as scenarios developed in coordination with other RAs?

Real-time is capitalized in Measures (1). It should be lower case as in the rest of the standard.

9. Do you agree with the Compliance Monitoring for 101?

Yes

No

Comments:

10. Do you agree with the Levels of Non-compliance for 101?

Yes

No

Comments:

Change (e)(1)(ii) to read "...action(s) required as a result of other Reliability Authorities' Operating Procedures, Processes or Plans, ..."

Insert "as listed in (a) at the end of (e)(4)(ii).

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of ‘agreed upon’ conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.
- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.
- There wasn’t a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

Yes

No

Comments:

A weekly call is appropriate, however; it needs to be extended to all RAs with whom the initiating RA shares operating procedures, processes or plans not just those adjacent RAs.

12. Do you agree with the Compliance Monitoring for 102?

Yes

No

Comments:

13. Do you agree with the Levels of Non-compliance for 102?

Yes

No

Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

Yes

No

Comments:

The expectation that the RAs will be able to agree on the most conservative solution may be equally unattainable as is agreement on the problem and appropriate solution.

15. Do you agree with the Compliance Monitoring for 103?

Yes

No

Comments:

16. Do you agree with the Levels of Non-compliance for 103?

Yes

No

Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

X No

Comments:

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

X Comments:

None

19. Other comments on this standard:

X Comments:

When the term Reliability Authority is used it should be written out completely instead of abbreviated to RA as it is in some places in 103.

Doesn't FERC need to be included in the distribution list for the letters in the Sanction Matrix section of the standard?

Also in the Sanction Matrix section of the standard, noncompliance should hyphenated like it is in the rest of the standard or either the standard language needs to be changed to match the usage here.

The SDT is to be congratulated on the effort that they have put into this version of the standard. It shows a considerable amount of improvement from the first draft.

Note – This form is to comment on version 2 of the Coordinate Operations Standard.

The latest version of this Standard (**COORD_OPERATONS_05_02**) is posted on the Standards web site at: <http://www.nerc.com/~filez/standards/Coordinate-Operations.html>

E-mail this form between June 2–July 2, 2004 to: sarcomm@nerc.com with “Comments” in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

Background:

The Coordinate Operations Standard Drafting Team produced this second draft of the Coordinate Operations Standard

The most significant changes to the standard include the following:

Requirement 101 — Procedures, Processes or Plans

1. 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.
2. 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.
3. 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.
4. 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 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Commenter Information (For Individual Commenters)

Name: Kathleen A. Davis
Organization: Tennessee Valley Authority
Industry Segment #:1
Telephone: 423-751-6172
E-mail: adavis@tva.gov

Key to Industry Segment #'s:

- 1 – Trans. Owners
- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial
Regulatory or other Govt. Entities

Comment Form for 1st Posting of Coordinate Operations Standard

STD Commenter Information (For Groups Submitting Group Comments)		
Name of Group:	Group Chair: Chair Email:	Chair Phone:
List of Group Participants that Support These Comments:		
Name	Company	Industry Segment #
Chuck Feagans	Tennessee Valley Authority	1
Sue Goins	Tennessee Valley Authority	1
Edd Forsythe	Tennessee Valley Authority	1
Gary Lewis	Tennessee Valley Authority	1
Jerry Wynne	Tennessee Valley Authority	1
Stuart Goza	Tennessee Valley Authority	1

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, ‘must’ was changed to ‘should’ to indicate the steps in the procedure ‘should’ be followed.

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) 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.

1. Do you agree with the changes made to the definition of Operating Procedure?

Yes

No

Comments:

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

Yes

No

Comments: We assume that the CM is the regional entity. clarify who will perform audits

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

- (ii) Each Reliability Authority's Operating Procedure, Process or Plan that requires one or more other Reliability Authorities to take action (e.g. make notifications, exchange information, or coordinate actions) shall be:
 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

- Yes
 No
 Comments:

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

- Yes
 No
 Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

- Yes
 No
 Comments: should say "distribution list or equivalent"

8. Do you have any other comments on Requirement 101?

Yes

No

X Comments: 101 Procedures (a) Requirements (1) ".....shall address Scenarios that affect other Reliability Authority Areas....."

The term "Scenarios" needs clarification. This is defined as a "Possible Event." If the required analysis of Scenerios is defined in other Standards then a reference to that Standard should be given. As written this is too vague!

9. Do you agree with the Compliance Monitoring for 101?

Yes

No

X Comments: would prefer that the "calendar year" be changed to Rolling 12 months

10. Do you agree with the Levels of Non-compliance for 101?

Yes

No

Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
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Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
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- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
 No
 Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
 No
 Comments:

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
 No
 Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

Yes

No

Comments:

- The notion of what is "conservative" could be different for different systems (data and models can be off). Implementation will be problematic.
- Cannot agree on the solution "the more conservative solution shall be implemented." This requirement should only apply regarding conditions involving a potential IROL violation or EEA Level 3 condition.

15. Do you agree with the Compliance Monitoring for 103?

Yes

No

Comments: change calendar year to rolling 12 months

16. Do you agree with the Levels of Non-compliance for 103?

Yes

No

Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

No

Comments:

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics: definitions and clarification for terms. "conservative solution"...give examples that reflect different operating philosophies.

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

Comments:

19. Other comments on this standard:

Comments:

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Requirement 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
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Commenter Information (For Individual Commenters)

Name:

Organization:

Industry Segment #:

Telephone:

E-mail:

Key to Industry Segment #'s:

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- 4 – TDU's
- 5 - Generators
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- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial
Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)		
Name of Group: Operating Reliability Working Group (ORWG) Southwest Power Pool		Group Chair: Scott Moore Chair Phone: 614-716-6600 Chair Email: spmoore@aep.com
List of Group Participants that Support These Comments:		
Name	Company	Industry Segment #
Mike Gammon	KCPL	1
Jason Smith	Entergy	1
Nat Stephens	Entergy	1
Jerry Stout	Entergy	1
Robert Rhodes	SPP	2

Definitions

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Yes

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Comments:

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Comments:

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- Yes
- No
- Comments:

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4. Do you agree with this addition to Requirement 101?

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- No
- Comments:

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5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

- Yes
- No
- Comments:

A review period of at least annually would be much more appropriate.

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

- Yes
- No
- Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

- Yes
- No
- Comments:

8. Do you have any other comments on Requirement 101?

Yes

No

Comments:

The last sentence in (a)(1) seems redundant. Isn't scenarios that affect other RA Areas basically the same as scenarios developed in coordination with other RAs?

Real-time is capitalized in Measures (1). It should be lower case as in the rest of the standard.

9. Do you agree with the Compliance Monitoring for 101?

Yes

No

Comments:

10. Do you agree with the Levels of Non-compliance for 101?

Yes

No

Comments:

Change (e)(1)(ii) to read "...action(s) required as a result of other Reliability Authorities' Operating Procedures, Processes or Plans, ..."

Insert "as listed in (a) at the end of (e)(4)(ii).

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
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- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.
- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.
- There wasn’t a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

Yes

No

Comments:

A weekly call is appropriate, however; it needs to be extended to all RAs with whom the initiating RA shares operating procedures, processes or plans not just those adjacent RAs.

12. Do you agree with the Compliance Monitoring for 102?

Yes

No

Comments:

13. Do you agree with the Levels of Non-compliance for 102?

Yes

No

Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

Yes

No

Comments:

The expectation that the RAs will be able to agree on the most conservative solution may be equally unattainable as is agreement on the problem and appropriate solution.

15. Do you agree with the Compliance Monitoring for 103?

Yes

No

Comments:

16. Do you agree with the Levels of Non-compliance for 103?

Yes

No

Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

X No

Comments:

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

X Comments:

None

19. Other comments on this standard:

X Comments:

When the term Reliability Authority is used it should be written out completely instead of abbreviated to RA as it is in some places in 103.

Doesn't FERC need to be included in the distribution list for the letters in the Sanction Matrix section of the standard?

Also in the Sanction Matrix section of the standard, noncompliance should hyphenated like it is in the rest of the standard or either the standard language needs to be changed to match the usage here.

The SDT is to be congratulated on the effort that they have put into this version of the standard. It shows a considerable amount of improvement from the first draft.

Note – This form is to comment on version 2 of the Coordinate Operations Standard.

The latest version of this Standard (**COORD_OPERATONS_05_02**) is posted on the Standards web site at: <http://www.nerc.com/~filez/standards/Coordinate-Operations.html>

E-mail this form between June 2–July 2, 2004 to: sarcomm@nerc.com with “Comments” in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

Background:

The Coordinate Operations Standard Drafting Team produced this second draft of the Coordinate Operations Standard

The most significant changes to the standard include the following:

Requirement 101 — Procedures, Processes or Plans

1. 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.
2. 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.
3. 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.
4. 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 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Comment Form for 1st Posting of Coordinate Operations Standard

STD Commenter Information (For Individual Commenters)
Name
Organization
Industry Segment #
Telephone
E-mail

<p>Key to Industry Segment #'s:</p> <p>1 – Trans. Owners 2 – RTO's, ISO's, RRC's 3 – LSE's 4 – TDU's 5 - Generators 6 - Brokers, Aggregators, and Marketers 7 - Large Electricity End Users 8 - Small Electricity Users 9 - Federal, State, and Provincial Regulatory or other Govt. Entities</p>
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STD Commenter Information (For Groups Submitting Group Comments)		
Name of Group: <i>MAAC</i>	Group Chair: <i>Bruce Balmat</i>	
	Chair Phone: 610-666-8860	
	Chair Email: balmatbm@pjm.com	
List of Group Participants that Support These Comments:		
Name	Company	Industry Segment #
Bruce Balmat	PJM	2
Joseph Willson	PJM	2
Mark Kuras	PJM	2
Albert DiCaprio	PJM	2

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, ‘must’ was changed to ‘should’ to indicate the steps in the procedure ‘should’ be followed.

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) 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.

1. Do you agree with the changes made to the definition of Operating Procedure?

- Yes
- No
- Comments:

MAAC agrees that the System Operator should not be made a slave to a printed procedure and must be allowed to vary procedures to fit the situations.

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

- Yes
- No
- Comments:

NERC’s compliance process requires that all non-compliant entities submit a mitigation plan that (a) describes the actions that will be taken; and (b) when those actions will be implemented.

MAAC believes that the addition of the arbitrary 90 day review period is unnecessary and not in keeping with the approved NERC Compliance process

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

- (ii) Each Reliability Authority's Operating Procedure, Process or Plan that requires one or more other Reliability Authorities to take action (e.g. make notifications, exchange information, or coordinate actions) shall be:
 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

MAAC agrees with the idea but not with the words as written.

Requirement 101.a.1.i.f needs clarification. Terminology-wise “adverse impact” is not a defined phrase. Format-wise it doesn’t fit into the list of conditions requiring plans. Having the authority to act for conditions outside one’s RA is one thing; having the obligation to act is another – what is the intent of the requirement?

Comment Form for 2nd Posting of Coordinate Operations Standard

MAAC's RA has the authority to take all actions appropriate to its tariff and Operating Agreement and does not need a NERC standard to mandate that authority. However, the words written into this posting leaves open the possibility for a standard that will mandate "no adverse impacts" and leave the interpretation of "adverse impact" up to some undefined person or persons.

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

- Yes
 No
 Comments

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

- Yes
 No
 Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

- Yes
 No
 Comments:

MAAC questions the value of a NERC Standard that requires a Distribution list for procedures when electronic distribution and web-site distribution is a growing trend.

8. Do you have any other comments on Requirement 101?

- Yes
- No
- Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
- No
- Comments:

Annual Certification is just that – a entity attesting that it is in compliance. The Annual Certification proscribed by this standard is not an attestation as much as it is a mini-audit.

Item (d) 3 should state “5 business days” instead of “5 days”.

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
- No
- Comments:

As long as an entity has a document with a date and a distribution list that entity is compliant even if the document did not address any of the real time problems on its system.

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority’s Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of ‘agreed upon’ conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.
- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.
- There wasn’t a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
 No
 Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
 No
 Comments:

Maintaining 12 months of tape records is excessive.

Item (d) 3 should state “5 business days” instead of “5 days”.

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
 No
 Comments:

The specified Levels of Non-Compliance do not logically follow. A failure to Call participants is a Level 1, whereas by-passing a step in a procedure is a level 4.

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

- Yes
- No
- Comments:

15. Do you agree with the Compliance Monitoring for 103?

- Yes
- No
- Comments:

16. Do you agree with the Levels of Non-compliance for 103?

- Yes
- No
- Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

No

Comments:

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

Comments:

19. Other comments on this standard:

Comments:

Note – This form is to comment on version 2 of the Coordinate Operations Standard.

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If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

Background:

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1. 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.
2. 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.
3. 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.
4. 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 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. 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.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. 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.

Comment Form for 1st Posting of Coordinate Operations Standard

<p>Commenter Information (For Individual Commenters)</p> <p>Name:</p> <p>Organization:</p> <p>Industry Segment #:</p> <p>Telephone:</p> <p>E-mail:</p>	<p>Key to Industry Segment #'s:</p> <p>1 – Trans. Owners</p> <p>2 – RTO's, ISO's, RRC's</p> <p>3 – LSE's</p> <p>4 – TDU's</p> <p>5 - Generators</p> <p>6 - Brokers, Aggregators, and Marketers</p> <p>7 - Large Electricity End Users</p> <p>8 - Small Electricity Users</p> <p>9 - Federal, State, and Provincial Regulatory or other Govt. Entities</p>
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STD Commenter Information (For Groups Submitting Group Comments)	
<p>Name of Group: NPCC, CP9 Reliability Standards Working Group</p>	<p>Group Chair: Guy Zito Chair Phone: 212-840-1070 Chair Email: gzito@npcc.org</p>

List of Group Participants that Support These Comments:

Name	Company	Industry Segment #
Roger Champagne	TransEnergie (Quebec)	1
Ralph Rufrano	New York Power Authority	1
David Kiguel	Hydro One Networks (Ontario)	1
David Little	Nova Scotia Power	1
Kathleen Goodman	ISO New England	2
John Norden	ISO New England	2
Peter Lebro	US National Grid	1
Khaqan Khan	The Independent Electricity Market Operator IMO, Ontario	2
Alan Adamson	New York State Reliability Council	2
Guy Zito, Brian Hogue	Northeast Power Coordinating Council	2

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) 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.

system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, 'must' was changed to 'should' to indicate the steps in the procedure 'should' be followed.

1. Do you agree with the changes made to the definition of Operating Procedure?

- Yes
- No
- Comments:

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

- Yes
- No
- Comments:

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

- (ii) Each Reliability Authority's Operating Procedure, Process or Plan that requires one or more other Reliability Authorities to take action (e.g. make notifications, exchange information, or coordinate actions) shall be:
 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- 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?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

- Yes
 No
 Comments:

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

- Yes
 No
 Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

- Yes
 No
 Comments:

8. Do you have any other comments on Requirement 101?

- Yes
- No
- Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
- No
- Comments:

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
- No
- Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority's Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of 'agreed upon' conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.
- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.

Comment Form for 2nd Posting of Coordinate Operations Standard

- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
- No
- Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
- No
- Comments:

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
- No
- Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

- Yes
- No
- Comments:

15. Do you agree with the Compliance Monitoring for 103?

- Yes
- No
- Comments:

16. Do you agree with the Levels of Non-compliance for 103?

- Yes
- No
- Comments:

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

No

Comments: NPCC suggests that the drafting team ensure all the necessary attributes pertaining to this standard appear in the standard and not in any companion document.

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

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

Comments:

19. Other comments on this standard:

Comments:

Standard statement about opposition to Monetary sanctions.

We support Mr. Gent's comments to the NERC BOT that monetary sanctions are ineffective to ensure compliance and that market mechanisms and letters of increasing severity are more effective.

There is an issue with the concept of inclusion of a monetary sanction matrix and what its implications are. 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. NPCC has indicated that any posted Standard, with such a matrix, will not be supported by NPCC, or its members. There are, however, proceedings at NERC by the Compliance Certification Committee (CCC) to address alternative sanction proposals and NPCC will continue to work to oppose monetary sanctions.

In addition the NPCC Compliance Sanction Alternative study provides evidence that supports the above.