

Summary Consideration: The drafting team did not make any changes to FAC-008 or FAC-009 as a result of comments submitted with the first re-ballot of these standards.

Company	Balloter	Ballot	Comments
Con Edison Company of New York CEPD	vinod kotecha	Negative	In addition to the comments submitted by NYSRC and NPCC, we need to make sure that the generator ratings are conveyed to the Transmission Owner(s) providing the interconnection service to the generator. Please have "Transmission Owner(s)" added to the distribution list in FAC 008-1 and FAC 009-1.
Response: Transmission Owners can get ratings from Generator Owners through Interconnection Agreements.			
Hydro One Networks Inc.	Ajay Garg	Affirmative	Although Hydro One Networks' vote is affirmative, we are concerned with the procedural action of separating the ballot of the three DFR standards. These standards originated in a single SAR, had one drafting team, were posted and commented as one set and ballot body registration was for the package. The SAC must take steps to avoid similar unbundling in the future.
Response: As these standards were developed, they were reviewed on an individual basis so that balloters should already be familiar with the content and interdependencies. The reliability standards process is still a new process, and just because the Version 0 standards were balloted as a whole, this should not set a precedent that all sets of standards must be balloted as a whole. The drafting team does agree that if new standards have interdependencies, then those sets of interdependent standards should be balloted as a 'set' rather than individually. This is what the drafting team attempted to do in combining the ballot for FAC-008 with the ballot for FAC-009; and in combining the ballot for FAC-010 with that for FAC-011, etc.			
Hydro-Quebec HQT	MICHEL ARMSTRONG	Negative	The preballot posting appeared as one package of coordinated standards with associated implementation plan. The ballot shows this package has been split into three sets of two standards each and the industry hasn't been afforded the time to determine if the implementation plan is still valid or if there are no interrelationships of the standards that exist, making the individual sets valid if they passed and were stand alone.
Response: As these standards were developed, they were reviewed on an individual basis so that balloters should already be familiar with the content and interdependencies. The reliability standards process is still a new process, and just because the Version 0 standards were balloted as a whole, this should not set a precedent that all sets of standards must be balloted as a whole. The drafting team does agree that if new standards have interdependencies, then those sets of interdependent standards should be balloted as a 'set' rather than individually. This is what the drafting team attempted to do in combining the ballot for FAC-008 with the ballot for FAC-009; and in combining the ballot for FAC-010 with that for FAC-011, etc.			

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New York Power Authority NYPA	Ralph Rufrano	Negative	NYPA's no vote on these proposed standards are in support of the NYSRC comments on the issue.
Response: Please see the response to the NYSRC comments.			
New York State Electric and Gas Corporation NYET	Henry G Masti	Negative	See comments of NYSRC
Response: Please see the response to the NYSRC comments.			
Midwest Independent Transmission System Operator, Inc.	Terry Bilke	Affirmative	Please see our comments from the previous ballot.
Response: The drafting team could not find any comments you submitted with the previous ballot on FAC-008 and FAC-009.			
New York State Reliability Council	Alan Adamson	Negative	<p>The New York State Reliability Council (NYSRC) has voted NO on proposed Standards FAC-008-1, 009-1, 012-1, and 013-1 because of the concerns addressed below.</p> <ol style="list-style-type: none"> 1. There are interrelations and dependencies between the three groups of DFR standards, and we therefore believe that it was inappropriate that they were split up for balloting purposes. For example, the Transfer Capability standard requires that "Transfer Capabilities must respect all applicable System Operating Limits (SOLs)". If the Transfer Capability standards were adopted without the SOL standards (FAC-010-1 and FAC-011-1), there would be no NERC SOL methodology standard basis for determining Transfer Capabilities. While it is true that today the Regions may have their own SOL requirements, NERC has no compliance review requirements for such Regional requirements. Further, certain Regional SOL requirements may not require Category C Contingency assessments that we believe are required to avoid excessive Transfer Capabilities (see our comments on FAC-010-1 and FAC-011-1). 2. Implementation Plan. There is no indication of how NERC would revise the DFR implementation plan if only one or two of the DFR groups were adopted. 3. Lack of Review Time. Because of NERC's

			<p>last minute voting group change there was insufficient time for the NYSRC to completely review the above two issues. Also, the NYSRC was unable to provide NY voting entities balloting recommendations in time for their vote (see item #4 below). If the decision to ballot the DFR standards in three groups had been made a few weeks earlier, the NYSRC would have had time to carefully consider these issues.</p> <p>4. Process Concerns. We believe that NERC's last minute announcement on October 4, 2005, the first day of balloting - to ballot the six DFR standards in three groups instead of one group, as previously announced - was unacceptable. We believe that this action either violated NERC's own standard development procedure, or if not, circumvented the intent of the process. If the latter was the case, the NYSRC recommends that NERC revise its standards development process manual to prevent such inappropriate actions from re-occurring in the future. Also, there is a 30-day pre-ballot review period within the standards development process. This review gives stakeholders an opportunity to closely scrutinize the final posting and propose voting strategies to other organizations. The last minute announcement on October 4 undermined and confused the NYSRC voting recommendations that had been developed prior to October 4. The reason NERC waited until the first day of balloting to announce the three DFR balloting groups was never explained and remains to us a mystery.</p>
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Response:

1. The drafting team does not see where the standards (FAC-008 through FAC-012) must all be implemented at the same time. While FAC-0012 does require that the Transfer Capability methodology developed ensure that SOLs are not exceeded, SOLs are developed and exist today and should be respected in the development of Transfer Capabilities, even if the proposed standard for the development of an SOL methodology is not approved. The reliability standards process is still a new process, and just because the Version 0 standards were balloted as a whole, this should not set a precedent that all sets of standards must be balloted as a whole. The drafting team does agree that if new standards have interdependencies, then those sets of interdependent standards should be balloted as a 'set' rather than individually. This is what the drafting team attempted to do in combining the ballot for FAC-008 with the ballot for FAC-009; and in combining the ballot for FAC-010 with that for FAC-011, etc. FAC-008 and FAC-009 are basic and surely could move forward without any of the other standards in this series.

2. The implementation plan doesn't include any cross references between standards and therefore does not need to be modified if only one or two of the DFR sets of standards were adopted.

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<p>3. The Standards Process Manual does not address this area, however as per the implementation plan there are no cross references between the standards that should preclude approving one set with or without the other sets of standards.</p> <p>4. The Standards Process Manual does not address this area and we do not believe there has been any violation of the process.</p>			
Northeast Power Coordinating Council	Edward Schwerdt	Negative	The Determine Facility Ratings, Operating Limits and Transfer Capabilities Standards were developed and reviewed by the industry as a package. The separation of these proposed standards at ballot time does not afford the industry the opportunity to assess the potential impact that split votes could have on the underlying technical interrelationships or implementation plans.
<p>Response: As these standards were developed, they were reviewed on an individual basis so that balloters should already be familiar with the content and interdependencies. The reliability standards process is still a new process, and just because the Version 0 standards were balloted as a whole, this should not set a precedent that all sets of standards must be balloted as a whole. The drafting team does agree that if new standards have interdependencies, then those sets of interdependent standards should be balloted as a 'set' rather than individually. This is what the drafting team attempted to do in combining the ballot for FAC-008 with the ballot for FAC-009; and in combining the ballot for FAC-010 with that for FAC-011, etc.</p>			
Western Electricity Coordinating Council	Louise McCarren	Affirmative	While the Interconnection Wide Regional Differences identified in FAC-010-1 adequately reflect the more stringent requirements in the Western Interconnection, that for the good of the industry and the sake of reliability, Individual Regions and the Standards Drafting Team should consider modifying the requirements of the NERC Standard to require the consideration of credible multiple element contingencies, similar to those identified in the Western Interconnection Wide Regional Differences, in establishing System Operating Limits.
<p>Response: This comment is not relevant to this ballot which is for FAC-008 and FAC-009 but will be considered with FAC-010.</p>			
Hydro One Networks Inc	Mike Penstone	Affirmative	Although voting affirmative, Hydro One Networks has concerns with the procedural action of separating the ballot of the three DFR standards. These standards originated in a single SAR, had one drafting team, were posted and commented as one set and ballot body registration was for the package. The SAC must take steps to avoid similar unbundling in the future.

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<p>Response: As these standards were developed, they were reviewed on an individual basis so that balloters should already be familiar with the content and interdependencies. The reliability standards process is still a new process, and just because the Version 0 standards were balloted as a whole, this should not set a precedent that all sets of standards must be balloted as a whole. The drafting team does agree that if new standards have interdependencies, then those sets of interdependent standards should be balloted as a 'set' rather than individually. This is what the drafting team attempted to do in combining the ballot for FAC-008 with the ballot for FAC-009; and in combining the ballot for FAC-010 with that for FAC-011, etc.</p>			
MidAmerican Energy Company MEC	Thomas C. Mielnik	Affirmative	I fail to see the reliability benefit of requiring parties to respond to comments about methodology within 45 days. I have voted yes in spite of my concern.
<p>Response: The intent in setting a timeframe was to ensure that the timeframe was short enough that the comments would not linger without attention for too long, while also being long enough to provide the developer of the methodology an opportunity to research the validity of the comments.</p>			
Niagara Mohawk NMPC	Michael Schiavone	Negative	The ballot shows this package has been split into three sets of two standards each and the industry hasn't been afforded the time to determine if the implementation plan is still valid or if there are no interrelationships of the standards that exist, making the individual sets valid if they passed and were stand alone.
<p>Response: As these standards were developed, they were reviewed on an individual basis so that balloters should already be familiar with the content and interdependencies. The reliability standards process is still a new process, and just because the Version 0 standards were balloted as a whole, this should not set a precedent that all sets of standards must be balloted as a whole. The drafting team does agree that if new standards have interdependencies, then those sets of interdependent standards should be balloted as a 'set' rather than individually. This is what the drafting team attempted to do in combining the ballot for FAC-008 with the ballot for FAC-009; and in combining the ballot for FAC-010 with that for FAC-011, etc.</p>			
Grant County PUD No.2 GCPD	Kevin John Conway	Negative	Grant feels that these proposals are stating the obvious, and are unnessesary. At the rate we are proposing new standards, it will be virtually impossible to keep all operators current and educated on all the standards they are responsible for.
<p>Response: The SAR for these standards was supported by stakeholders.</p>			
Sacramento Municipal Utility District SMUD	E. Nick Henery	Affirmative	See Comments from Last Vote
<p>Response: <i>Here are your comments from the previous ballot and the drafting team's response to those comments:</i> Comment: While the Interconnection Wide Regional Differences identified in FAC-010-1 adequately reflect the more stringent requirements in the Western Interconnection, for the good of the industry and the sake of reliability, the Standards Drafting Team consider modifying the requirements of the NERC Standard to require the consideration of credible multiple element contingencies, similar to those identified in the Western Interconnection Wide Regional Differences, in establishing System Operating Limits. Response: This comment is not relevant to this ballot which is for FAC-008 and FAC-009 but will be considered with FAC-010.</p>			

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California Energy Commission	William Mitchell Chamberlain	Affirmative	While the Interconnection Wide Regional Differences identified in FAC-010-1 adequately reflects the more stringent requirements in the Western Interconnection, for the good of the industry and the sake of reliability, the Standards Drafting Team should consider modifying the requirements of the NERC Standard to require the consideration of credible multiple element contingencies, similar to those identified in the Western Interconnection Wide Regional Differences, in establishing System Operating Limits.
Response: This comment is not relevant to this ballot which is for FAC-008 and FAC-009 but will be considered with FAC-010.			