

Comment Form — 2nd Draft of SAR for Project 2007-11 Underfrequency Load Shedding

Please use this form to submit comments on Draft 2 of the SAR for Project 2007-01, Underfrequency Load Shedding (UFLS). Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "UFLS SAR" in the subject line. If you have questions please contact David Taylor at dave.taylor@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Joe Springhetti	
Organization:	We Energies	
Telephone:	262-544-7132	
E-mail:	joseph.springhetti@we-energies.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input checked="" type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

This project involves revising the requirements in the following standards:

- PRC-006 — Development and Documentation of Regional Reliability Organizations' Underfrequency Load Shedding Programs
- PRC-007 — Assuring Consistency with Regional UFLS Programs
- PRC-009 — UFLS Performance Following an Underfrequency Event

The standards in this set are all Version 0 standards. As the electric reliability organization begins enforcing compliance with reliability standards under Section 215 of the Federal Power Act in the United States and applicable statutes and regulations in Canada, the industry needs a set of clear, measurable, and enforceable reliability standards. The Version 0 standards, while a good foundation, were translated from historical operating and planning policies and guides that were appropriate in an era of voluntary compliance. The Version 0 standards and recent updates were put in place as a temporary starting point to start up the electric reliability organization and begin enforcement of mandatory standards. However, it is important to update the standards in a timely manner, incorporating improvements to make the standards more suitable for enforcement and to capture prior recommendations that were deferred during the Version 0 translation.

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PRC-007 and PRC-009 have some "fill-in-the-blank" characteristics as identified in the Regional Reliability Standards Working Group work plan, which need to be removed. These standards shall be included with PRC-006 for consideration as one or more revised standards as necessary for consistency and clarity of overall program requirements and any other associated programs and/or requirements that affect or impact the UFLS program.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high-quality, enforceable, and technically sufficient bulk power system reliability standards.

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5. Other miscellaneous changes as requested and agreed to by the SAR drafting team and identified in the redlined version of Draft 2 of the SAR for Project 2007-01.

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Yes

No

Comments:

2. Do you agree with revising the SAR to clarify the scope of work to be performed on each standard including the addition of Appendix A and Appendix C to the SAR? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with expanding the Applicability section of the SAR to include Balancing Authority, Planning Authority or Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator so that the standard drafting team can consider these entities when reviewing the appropriate applicability of the standards? If not, please explain in the comment area.

Yes

No

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Kathleen Goodman	
Organization:	ISO New England	
Telephone:	(413) 535-4111	
E-mail:	kgoodman@iso-ne.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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- PRC-007 — Assuring Consistency with Regional UFLS Programs
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Yes

No

Comments:

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Yes

No

Comments:

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Yes

No

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Jason Shaver	
Organization:	American Transmission Co.	
Telephone:	262 506 6885	
E-mail:	jshaver@atcllc.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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Yes

No

Comments:

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Yes

No

Comments: The standard should address both underfrequency and overfrequency, to avoid shedding too much load. The standard should also make it clear that generators must be well-protected, while still supporting the integrity of the system. Thus, Generators Owners must be part of the decision process when the regional entities establish the requirements for generators to remain on-line.

Since it is possible that an island can be formed that envelopes more than one regional entity, we recommend strong coordination between neighboring regions so that different and/or conflicting standards are not identified as resolution for a common island.

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No

Comments:

Comment Form — 2nd Draft of SAR for Project 2007-11 Underfrequency Load Shedding

Please use this form to submit comments on Draft 2 of the SAR for Project 2007-01, Underfrequency Load Shedding (UFLS). Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "UFLS SAR" in the subject line. If you have questions please contact David Taylor at dave.taylor@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Steve Myers	
Organization:	ERCOT	
Telephone:	512-248-3077	
E-mail:	smyers@ercot.com	
NERC Region		Registered Ballot Body Segment
<input checked="" type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

This project involves revising the requirements in the following standards:

- PRC-006 — Development and Documentation of Regional Reliability Organizations' Underfrequency Load Shedding Programs
- PRC-007 — Assuring Consistency with Regional UFLS Programs
- PRC-009 — UFLS Performance Following an Underfrequency Event

The standards in this set are all Version 0 standards. As the electric reliability organization begins enforcing compliance with reliability standards under Section 215 of the Federal Power Act in the United States and applicable statutes and regulations in Canada, the industry needs a set of clear, measurable, and enforceable reliability standards. The Version 0 standards, while a good foundation, were translated from historical operating and planning policies and guides that were appropriate in an era of voluntary compliance. The Version 0 standards and recent updates were put in place as a temporary starting point to start up the electric reliability organization and begin enforcement of mandatory standards. However, it is important to update the standards in a timely manner, incorporating improvements to make the standards more suitable for enforcement and to capture prior recommendations that were deferred during the Version 0 translation.

PRC-006 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The standard drafting team (SDT) will work with stakeholders to review PRC-006 and each of the current regional programs developed in accordance with that standard, including any other associated programs and/or requirements related to and contained with the UFLS program documentation. The SDT shall determine which requirements should be continent-wide requirements and which requirements should be included in regional standards.

PRC-007 and PRC-009 have some "fill-in-the-blank" characteristics as identified in the Regional Reliability Standards Working Group work plan, which need to be removed. These standards shall be included with PRC-006 for consideration as one or more revised standards as necessary for consistency and clarity of overall program requirements and any other associated programs and/or requirements that affect or impact the UFLS program.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high-quality, enforceable, and technically sufficient bulk power system reliability standards.

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 - PRC-017 (currently in Project 2008-04)
 - PRC-018 Requirement 6 (currently in Project 2007-011)
2. The SAR was revised to clarify the scope of work to be performed on each standard including the addition of Appendix A to the SAR. The scope of the SAR is designed to provide the standard drafting team with sufficient flexibility to address all necessary revisions. Work is not to be limited to the “To Do List” (renamed, “Issues to Consider”), nor are the items identified in the Issues to Consider mandatory revisions. A unique development aspect of the projects included in NERC’s three-year reliability standards development plan is that the standard drafting teams will not be inhibited from addressing at one time all necessary improvements to the standards, or from even proposing new changes to the standard, as long as the changes are within the content area of the standard. The goal is for the drafting team to develop the best possible standard within the defined subject area, as supported by a consensus of stakeholders. The SAR drafting team encourages all commenters to read Volume I of [NERC’s Three-year Reliability Standards Development Plan](#) which identifies a set of specific issues each standard drafting team is to consider when revising a standard.
3. The Applicability section of the SAR was expanded to include Balancing Authority, Planning Authority/Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator. The “applicability” identified in the SAR is the starting point for consideration of redrafting of the standard. The standard drafting team will review the appropriate applicability of each of these standards.
4. The SAR drafting team noted a number of comments suggesting additional topics or issues to consider with the refinement of the standards. These comments have been noted and added to the SAR for resolution during standard drafting.
5. Other miscellaneous changes as requested and agreed to by the SAR drafting team and identified in the redlined version of Draft 2 of the SAR for Project 2007-01.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that PRC-008 should be removed from the list of standards to be revised in association with Project 2007-01 and placed into a project with all the relay maintenance and testing standards? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with revising the SAR to clarify the scope of work to be performed on each standard including the addition of Appendix A and Appendix C to the SAR? If not, please explain in the comment area.

Yes

No

Comments: However, the drafting team should be encouraged to more clearly communicate that such Appendices are lists of topics and comments that are to be considered, but they are not lists of requirements that must be included in the standard to be developed.

3. Do you agree with expanding the Applicability section of the SAR to include Balancing Authority, Planning Authority or Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator so that the standard drafting team can consider these entities when reviewing the appropriate applicability of the standards? If not, please explain in the comment area.

Yes

No

Comments:

4. Do you have any other concerns with the revisions made to the SAR? If yes, please explain in the comment area.

Yes

No

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Roger Champagne	
Organization:	Hydro-Québec TransÉnergie	
Telephone:	514 289-2211, X2766	
E-mail:	champagne.roger.2@hydro.qc.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

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- PRC-007 — Assuring Consistency with Regional UFLS Programs
- PRC-009 — UFLS Performance Following an Underfrequency Event

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The standard drafting team (SDT) will work with stakeholders to review PRC-006 and each of the current regional programs developed in accordance with that standard, including any other associated programs and/or requirements related to and contained with the UFLS program documentation. The SDT shall determine which requirements should be continent-wide requirements and which requirements should be included in regional standards.

PRC-007 and PRC-009 have some "fill-in-the-blank" characteristics as identified in the Regional Reliability Standards Working Group work plan, which need to be removed. These standards shall be included with PRC-006 for consideration as one or more revised standards as necessary for consistency and clarity of overall program requirements and any other associated programs and/or requirements that affect or impact the UFLS program.

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2. The SAR was revised to clarify the scope of work to be performed on each standard including the addition of Appendix A to the SAR. The scope of the SAR is designed to provide the standard drafting team with sufficient flexibility to address all necessary revisions. Work is not to be limited to the “To Do List” (renamed, “Issues to Consider”), nor are the items identified in the Issues to Consider mandatory revisions. A unique development aspect of the projects included in NERC’s three-year reliability standards development plan is that the standard drafting teams will not be inhibited from addressing at one time all necessary improvements to the standards, or from even proposing new changes to the standard, as long as the changes are within the content area of the standard. The goal is for the drafting team to develop the best possible standard within the defined subject area, as supported by a consensus of stakeholders. The SAR drafting team encourages all commenters to read Volume I of [NERC’s Three-year Reliability Standards Development Plan](#) which identifies a set of specific issues each standard drafting team is to consider when revising a standard.
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1. Do you agree that PRC-008 should be removed from the list of standards to be revised in association with Project 2007-01 and placed into a project with all the relay maintenance and testing standards? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with revising the SAR to clarify the scope of work to be performed on each standard including the addition of Appendix A and Appendix C to the SAR? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with expanding the Applicability section of the SAR to include Balancing Authority, Planning Authority or Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator so that the standard drafting team can consider these entities when reviewing the appropriate applicability of the standards? If not, please explain in the comment area.

Yes

No

Comments:

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Yes

No

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
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Yes

No

Comments:

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Yes

No

Comments:

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Yes

No

Comments:

2. Do you agree with revising the SAR to clarify the scope of work to be performed on each standard including the addition of Appendix A and Appendix C to the SAR? If not, please explain in the comment area.

Yes

No

Comments: The addition of Appendix A and Appendix C does not seem to improve clarity on the scope of work, but rather just add a list of "things to consider" for the standards drafting team. As it stands the scope of work is fairly wide open. However, we do not disagree that the standards drafting team should consider those comments.

3. Do you agree with expanding the Applicability section of the SAR to include Balancing Authority, Planning Authority or Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator so that the standard drafting team can consider these entities when reviewing the appropriate applicability of the standards? If not, please explain in the comment area.

Yes

No

Comments:

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Yes

No

Comments:

Comment Form — 2nd Draft of SAR for Project 2007-11 Underfrequency Load Shedding

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Brian Thumm	
Organization:	ITC Holdings	
Telephone:	248.374.7846	
E-mail:	bthumm@itctransco.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

This project involves revising the requirements in the following standards:

- PRC-006 — Development and Documentation of Regional Reliability Organizations' Underfrequency Load Shedding Programs
- PRC-007 — Assuring Consistency with Regional UFLS Programs
- PRC-009 — UFLS Performance Following an Underfrequency Event

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PRC-007 and PRC-009 have some "fill-in-the-blank" characteristics as identified in the Regional Reliability Standards Working Group work plan, which need to be removed. These standards shall be included with PRC-006 for consideration as one or more revised standards as necessary for consistency and clarity of overall program requirements and any other associated programs and/or requirements that affect or impact the UFLS program.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that PRC-008 should be removed from the list of standards to be revised in association with Project 2007-01 and placed into a project with all the relay maintenance and testing standards? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with revising the SAR to clarify the scope of work to be performed on each standard including the addition of Appendix A and Appendix C to the SAR? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with expanding the Applicability section of the SAR to include Balancing Authority, Planning Authority or Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator so that the standard drafting team can consider these entities when reviewing the appropriate applicability of the standards? If not, please explain in the comment area.

Yes

No

Comments: None of the UFLS standards currently apply to either Planning function, and the SAR does not contemplate adding any requirements that do. The Planning Coordinator and the Transmission Planner should be removed from the scope of the SAR.

4. Do you have any other concerns with the revisions made to the SAR? If yes, please explain in the comment area.

Yes

No

Comments: Independent transmission companies do not have direct access to load (location, nature, etc.) in order to fully implement a UFLS program. The applicability of the Standard should be further modified to reflect the need for the DP/LSE to own/operate/develop/maintain a UFLS program in cooperation with its TO/TOP/RC. The standard is currently written to allow the Regional Entity to require a Transmission Operator or Operator to own/operate a UFLS program, and, in general, an independent transmission company does not have the means to implement load shedding programs.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Gammon	
Organization:	Kansas City Power & Light	
Telephone:	816-654-1242	
E-mail:	mike.gammon@kcpl.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
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1. Do you agree that PRC-008 should be removed from the list of standards to be revised in association with Project 2007-01 and placed into a project with all the relay maintenance and testing standards? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with revising the SAR to clarify the scope of work to be performed on each standard including the addition of Appendix A and Appendix C to the SAR? If not, please explain in the comment area.

Yes

No

Comments:

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Yes

No

Comments: Even though it is not mentioned in the question, the Reliability Coordinator should be included as one of the Applicable Entities. On the SAR the Reliability Authority is not checked in "The Standard will Apply to the Following Functions" table.

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Yes

No

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(Complete this page for comments from one organization or individual.)		
Name:	Robert Coish	
Organization:	Manitoba Hydro	
Telephone:	204-487-5479	
E-mail:	rgcoish@hydro.mb.ca	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
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Yes

No

Comments:

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Yes

No

Comments: MH believes a lot of good effort has been put into the drafting of this SAR to identify all the significant issues that need to be considered in drafting the UFLS standards. The standard drafting team has its work cut out for it! - but at least, hopefully, all the significant issues are identified.

3. Do you agree with expanding the Applicability section of the SAR to include Balancing Authority, Planning Authority or Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator so that the standard drafting team can consider these entities when reviewing the appropriate applicability of the standards? If not, please explain in the comment area.

Yes

No

Comments:

4. Do you have any other concerns with the revisions made to the SAR? If yes, please explain in the comment area.

Yes

No

Comments: Re-iterating significant comments made in 1st draft of SAR, but not included in MH comment section of Appendix C in 2nd draft:

PRC – 007 – 0

Measures.

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M1 - If "consistency" is to be clarified here, it must also be clarified for R1 as well. If R1 does not require this clarification, neither does M1. Also, does "consistency" really require further clarification?

NEW COMMENTS FOR 2ND DRAFT.

Appendix C -

PJM Comments.

I believe RRO's should stand between regional UFLS owner/control areas and NERC. Various RRO's may have some different methodologies and procedures which are appropriate to their specific RRO regions and not to others. There should not be a single UFLS criteria from NERC that covers ALL UFLS conditions and concerns for the entire grid.

NCMPA Comments.

I agree with non-compulsory compliance for utilities with very low peak loads if they are surrounded by utilities with load levels sizable enough to require compliance to UFLS programs. However, if there are a lot of small load utilities in an RRO region whose total peak load is sizable enough to require UFLS, these small utilities will have to coordinate as if they were one large utility in order to conform with their RRO's UFLS program in the same fashion a single large load utility would, to ensure proper total RRO region low frequency UFLS mitigation.

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3. The Applicability section of the SAR was expanded to include Balancing Authority, Planning Authority/Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator. The “applicability” identified in the SAR is the starting point for consideration of redrafting of the standard. The standard drafting team will review the appropriate applicability of each of these standards.
4. The SAR drafting team noted a number of comments suggesting additional topics or issues to consider with the refinement of the standards. These comments have been noted and added to the SAR for resolution during standard drafting.
5. Other miscellaneous changes as requested and agreed to by the SAR drafting team and identified in the redlined version of Draft 2 of the SAR for Project 2007-01.

The UFLS SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR for Project 2007-01. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.com with the words “UFLS SAR” in the subject line by **March 9, 2007**.

Comment Form — 2nd Draft of SAR for Project 2007-11 Underfrequency Load Shedding

You do not have to answer all questions. Enter all comments in simple text format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that PRC-008 should be removed from the list of standards to be revised in association with Project 2007-01 and placed into a project with all the relay maintenance and testing standards? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with revising the SAR to clarify the scope of work to be performed on each standard including the addition of Appendix A and Appendix C to the SAR? If not, please explain in the comment area.

Yes

No

Comments: In general, we agree with the inclusion of Appendix A and the relevant comments that are included in Appendix C. However, we have the following specific issues with regard to the comments in Appendix C. On Page C-2, we do not agree with KCP&L's assertion that all compliance programs are administered by Reliability Coordinators. Reliability Coordinators do not administer compliance programs. Additionally, we are concerned with the meaning of Manitoba Hydro's general comment on Page C-3 that the RA needs to be included. We are assuming they mean Reliability Coordinator. We do not oppose the Reliability Coordinator being included to the extent they are made aware and have the settings of the UFLS relays available to them; however, we clearly do not believe the Reliability Coordinator should have any coordination role or should replace the role of the RRO.

3. Do you agree with expanding the Applicability section of the SAR to include Balancing Authority, Planning Authority or Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator so that the standard drafting team can consider these entities when reviewing the appropriate applicability of the standards? If not, please explain in the comment area.

Yes

No

Comments: Is Planning Authority still in the functional model? We believe this function has been replaced.

4. Do you have any other concerns with the revisions made to the SAR? If yes, please explain in the comment area.

Yes

No

Comment Form — 2nd Draft of SAR for Project 2007-11 Underfrequency Load Shedding

Comments: In general, this SAR is much improved. We do support ATC's assertion on Page C-4 of Appendix C that the SDT should consider generation frequency response. We ask that they coordinate with the Frequency Response SAR drafting team.

Comment Form — 2nd Draft of SAR for Project 2007-11 Underfrequency Load Shedding

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
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	<input checked="" type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — 2nd Draft of SAR for Project 2007-11 Underfrequency Load Shedding

Group Comments (Complete this page if comments are from a group.)

Group Name: NPCC CP9, Reliability Standards Working Group
Lead Contact: Guy V. Zito
Contact Organization: Northeast Power Coordinating Council
Contact Segment: 10
Contact Telephone: 212-840-1070
Contact E-mail: gzito@npcc.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Kathleen Goodman	ISO- New England	NPCC	2
Bill Shemley	ISO- New England	NPCC	2
Greg Campoli	New York ISO	NPCC	2
Al Adamson	New York State Rel. Council	NPCC	10
Randy McDonald	New Brunswick System Operator	NPCC	2
Roger Champagne	TransEnergie HydroQuebec	NPCC	1
Bruno Jesus	Hydro One Networks	NPCC	1
Ron Falsetti	The IESO, Ontario	NPCC	2
Herb Schrayshuen	National Grid US	NPCC	1
Donald Nelson	MA Dept. of Tele. and Energy	NPCC	9
Ralph Rufrano	New York Power Authority	NPCC	1
Murale Gopinathan	Northeast Utilities	NPCC	1
Jerad Barnhart	NStar	NPCC	1
Guy V. Zito	NPCC	NPCC	10
Ed Tompson	ConEd	NPCC	1

Comment Form — 2nd Draft of SAR for Project 2007-11 Underfrequency Load Shedding

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

This project involves revising the requirements in the following standards:

- PRC-006 — Development and Documentation of Regional Reliability Organizations' Underfrequency Load Shedding Programs
- PRC-007 — Assuring Consistency with Regional UFLS Programs
- PRC-009 — UFLS Performance Following an Underfrequency Event

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PRC-006 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

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PRC-007 and PRC-009 have some "fill-in-the-blank" characteristics as identified in the Regional Reliability Standards Working Group work plan, which need to be removed. These standards shall be included with PRC-006 for consideration as one or more revised standards as necessary for consistency and clarity of overall program requirements and any other associated programs and/or requirements that affect or impact the UFLS program.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high-quality, enforceable, and technically sufficient bulk power system reliability standards.

Draft 1 of this SAR was posted for a 30-day public comment period from November 29, 2006 through January 12, 2007. The Underfrequency Load Shedding SAR Drafting Team asked stakeholders to provide feedback on the standard through a special standard Comment Form. There were 26 sets of comments, including comments from 70 different people from more than 25 companies representing 6 of the 10 industry segments.

Comment Form — 2nd Draft of SAR for Project 2007-11 Underfrequency Load Shedding

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 - PRC-017 (currently in Project 2008-04)
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Comment Form — 2nd Draft of SAR for Project 2007-11 Underfrequency Load Shedding

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that PRC-008 should be removed from the list of standards to be revised in association with Project 2007-01 and placed into a project with all the relay maintenance and testing standards? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with revising the SAR to clarify the scope of work to be performed on each standard including the addition of Appendix A and Appendix C to the SAR? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with expanding the Applicability section of the SAR to include Balancing Authority, Planning Authority or Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator so that the standard drafting team can consider these entities when reviewing the appropriate applicability of the standards? If not, please explain in the comment area.

Yes

No

Comments: We agree with the additional functions proposed in the Applicability section to allow the drafting team the ability to fully consider any entities that may have a role in the standard, also the entities need to be updated to match the latest version of the Functional Model.

4. Do you have any other concerns with the revisions made to the SAR? If yes, please explain in the comment area.

Yes

No

Comments:

Comment Form — 2nd Draft of SAR for Project 2007-11 Underfrequency Load Shedding

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Calimano	
Organization:	New York Independent System Operator	
Telephone:	(518) 356 - 6129	
E-mail:	mcalimano@nyiso.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that PRC-008 should be removed from the list of standards to be revised in association with Project 2007-01 and placed into a project with all the relay maintenance and testing standards? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with revising the SAR to clarify the scope of work to be performed on each standard including the addition of Appendix A and Appendix C to the SAR? If not, please explain in the comment area.

Yes

No

Comments: The addition of Appendix A and Appendix C does not seem to improve clarity on the scope of work, but rather just add a list of "things to consider" for the standards drafting team. As it stands the scope of work is fairly wide open. However, we do not disagree that the standards drafting team should consider those comments.

3. Do you agree with expanding the Applicability section of the SAR to include Balancing Authority, Planning Authority or Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator so that the standard drafting team can consider these entities when reviewing the appropriate applicability of the standards? If not, please explain in the comment area.

Yes

No

Comments:

4. Do you have any other concerns with the revisions made to the SAR? If yes, please explain in the comment area.

Yes

No

Comments:

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1. Do you agree that PRC-008 should be removed from the list of standards to be revised in association with Project 2007-01 and placed into a project with all the relay maintenance and testing standards? If not, please explain in the comment area.

Yes

No

Comments: PHI concurs that relay maintenance standards should be consolidated.

2. Do you agree with revising the SAR to clarify the scope of work to be performed on each standard including the addition of Appendix A and Appendix C to the SAR? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with expanding the Applicability section of the SAR to include Balancing Authority, Planning Authority or Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator so that the standard drafting team can consider these entities when reviewing the appropriate applicability of the standards? If not, please explain in the comment area.

Yes

No

Comments:

4. Do you have any other concerns with the revisions made to the SAR? If yes, please explain in the comment area.

Yes

No

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
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Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
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	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — 2nd Draft of SAR for Project 2007-11 Underfrequency Load Shedding

Group Comments (Complete this page if comments are from a group.)

Group Name: SERC EC Planning Standards Subcommittee
Lead Contact: Travis Sykes
Contact Organization: Tennessee Valley Authority
Contact Segment: 1
Contact Telephone: 423-751-4162
Contact E-mail: tssykes@tva.gov

Additional Member Name	Additional Member Organization	Region*	Segment*
Darrell Pace	Alabama Electric Cooperative	SERC	1
John Sullivan	Ameren	SERC	1
Bob McGarrah	Ameren	SERC	1
Charles Long	Energy	SERC	1
David Weekley	MEAG Power	SERC	1
Pat Huntley	SERC Reliability Corp	SERC	10
Phil Kleckley	SC Electric and Gas	SERC	3
Bob Jones	Southern Company Services	SERC	1
Brian Moss	Duke Energy Carolinas	SERC	1

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

This project involves revising the requirements in the following standards:

- PRC-006 — Development and Documentation of Regional Reliability Organizations' Underfrequency Load Shedding Programs
- PRC-007 — Assuring Consistency with Regional UFLS Programs
- PRC-009 — UFLS Performance Following an Underfrequency Event

The standards in this set are all Version 0 standards. As the electric reliability organization begins enforcing compliance with reliability standards under Section 215 of the Federal Power Act in the United States and applicable statutes and regulations in Canada, the industry needs a set of clear, measurable, and enforceable reliability standards. The Version 0 standards, while a good foundation, were translated from historical operating and planning policies and guides that were appropriate in an era of voluntary compliance. The Version 0 standards and recent updates were put in place as a temporary starting point to start up the electric reliability organization and begin enforcement of mandatory standards. However, it is important to update the standards in a timely manner, incorporating improvements to make the standards more suitable for enforcement and to capture prior recommendations that were deferred during the Version 0 translation.

PRC-006 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

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PRC-007 and PRC-009 have some "fill-in-the-blank" characteristics as identified in the Regional Reliability Standards Working Group work plan, which need to be removed. These standards shall be included with PRC-006 for consideration as one or more revised standards as necessary for consistency and clarity of overall program requirements and any other associated programs and/or requirements that affect or impact the UFLS program.

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1. PRC-008 was removed from the list of standards to be revised in association with Project 2007-01. The SAR drafting team agreed with a number of commenters that suggested grouping all the relay maintenance and testing standards into a single project. The SAR drafting team has requested that NERC staff remove PRC-008 from Project 2007-01 and place it in a project with the following standards:
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Yes

No

Comments:

2. Do you agree with revising the SAR to clarify the scope of work to be performed on each standard including the addition of Appendix A and Appendix C to the SAR? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with expanding the Applicability section of the SAR to include Balancing Authority, Planning Authority or Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator so that the standard drafting team can consider these entities when reviewing the appropriate applicability of the standards? If not, please explain in the comment area.

Yes

No

Comments: The PSS does not see a reason for including the BA, GO, and GOP, but has no objections to allowing the SDT to consider these entities.

4. Do you have any other concerns with the revisions made to the SAR? If yes, please explain in the comment area.

Yes

No

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Fred J. Frederick	
Organization:	Vectren Energy Delivery	
Telephone:	812-491-4570	
E-mail:	ffrederick@vectren.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that PRC-008 should be removed from the list of standards to be revised in association with Project 2007-01 and placed into a project with all the relay maintenance and testing standards? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with revising the SAR to clarify the scope of work to be performed on each standard including the addition of Appendix A and Appendix C to the SAR? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with expanding the Applicability section of the SAR to include Balancing Authority, Planning Authority or Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator so that the standard drafting team can consider these entities when reviewing the appropriate applicability of the standards? If not, please explain in the comment area.

Yes

No

Comments:

4. Do you have any other concerns with the revisions made to the SAR? If yes, please explain in the comment area.

Yes

No

Comments: UFLS steps should be set with a considerable amount of bandwidth. That is if there are 5 steps of 5% required, an entity could drop as much as say 10% in the first step and possibly drop as little as 1% in the second step. As long as the cumulative amount is within the requirements of that level of steps (5-10-15-20-25%). Trying to meet an exact amount of load drop is very difficult and would not provide enough benefit to justify the cost.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
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Comment Form — 2nd Draft of SAR for Project 2007-11 Underfrequency Load Shedding

Group Comments (Complete this page if comments are from a group.)

Group Name: NERC System Protection and Control Task Force

Lead Contact: Charles Rogers

Contact Organization: Consumers Energy

Contact Segment:

Contact Telephone: 517-788-0027

Contact E-mail: cwrogers@cmsenergy.com

Additional Member Name	Additional Member Organization	Region*	Segment*
W Mark Carpenter	TXU Energy Delivery	ERCOT	
David Angell	Idaho Power	WECC	
Deven Bhan	WAPA	MRO	
Joseph Burdis	PJM	RFC	
John Ciufu	Hydro One	NPCC	
Jim Ingeson	NYISO	NPCC	
Mike McDonald	Ameren	SERC	
William Miller	Exelon	RFC	
John Mulhausen	Florida Power and Light	FRCC	
James Roberts	TVA	SERC	
Evan Sage	PEPCO	RFC	
Jon Sykes	Salt River Project	WECC	
Phil Tatro	National Grid	NPCC	
Joe Uchiyama	US Bureau of Reclamation	WECC	
Eric Udren	KEMA		
Tom Wiedman	Wiedman Consulting		
Philip Winston	Georgia Power	SERC	
Baj Agrawal	Arizona Public Service	WECC	
Henry Miller	AEP	RFC	
Robert Cummings	NERC Staff		
Dean Sikes	CLECO	SPP	
Robert Stuart	Elequant	WECC	

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Yes

No

Comments:

2. Do you agree with revising the SAR to clarify the scope of work to be performed on each standard including the addition of Appendix A and Appendix C to the SAR? If not, please explain in the comment area.

Yes

No

Comments: The SPCTF has developed a report which provides a technical assessment of all three of these standards, which is attached. Please include the observations from this report in the scope of work on these standards.

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Yes

No

Comments: Please see the comments in the attached SPCTF report for the SPCTFs position on the applicable entities.

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Yes

No

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No

Comments:

2. Do you agree with revising the SAR to clarify the scope of work to be performed on each standard including the addition of Appendix A and Appendix C to the SAR? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with expanding the Applicability section of the SAR to include Balancing Authority, Planning Authority or Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator so that the standard drafting team can consider these entities when reviewing the appropriate applicability of the standards? If not, please explain in the comment area.

Yes

No

Comments: Southern does not object to the Standard Drafting team considering the BA, GO, and GOP in the applicability section. However, only after the requirements of the future standard are developed should a final determination be made on the applicability.

4. Do you have any other concerns with the revisions made to the SAR? If yes, please explain in the comment area.

Yes

No

Comments: We have a general concern with the ambiguity associated with the violation severity levels. For example, Moderate and High severity levels both state that an entity is deficient in one or more significant elements. It would seem reasonable that High severity would mean you were deficient in multiple (at least greater than one) significant elements and not just in one element as moderate states.

Are we to interpret a significant element is to mean a standard requirement? What are examples of a significant element other than a requirement contained in the standard?

Finally, we have a general comment about the SAR development process as a whole. FERC is concerned with the amount of time it takes NERC (through the ANSI accredited process) to develop a standard. Since the SAR development process only outlines the scope of the future standard development (in other words, there are no requirements to a SAR), it is recommended that the NERC standards development process accelerate through the SAR phase in order to initiate the more complex task of developing the requirements of a particular Standard. In other words, there should only be, at most, two rounds of comments for a SAR prior to it shifting to the standards drafting team.