

Consideration of Comments

Real-time Transmission Operations – Project 2007-03

The Real-time Transmission Operations Drafting Team thanks all commenters who submitted comments on the 7th draft and successive ballot of the standards for Real-time Operations (Project 2007-03). These standards were posted for a 30-day public comment period from March 22, 2012 through April 20, 2012. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form. There were 41 sets of comments, including comments from approximately 143 different people from approximately 111 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

The SDT made several clarifying changes to the project standards as a result of industry comments:

- TOP-001-2: deleted Operations Planning from the Time Horizons for Requirement R1
- TOP-002-3: changed to ninety calendar days in Data Retention
- TOP-003-2: added a reference to analysis functions to Requirement R2, Part 2.1 for consistency with the main requirement
- VSLs for TOP-001-2: added clarifying language to Requirements R3, R5, and R6 for consistency with Requirement R8

The changes made are clarifying in nature and do not change the content or intent of the requirements. Therefore, the SDT is requesting that the project be moved to a recirculation ballot.

No new minority opinions arose in this round of comments.

All comments submitted may be reviewed in their original format on the standard's project page:

http://www.nerc.com/filez/standards/Real-time_Operations_Project_2007-03.html

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President of Standards and Training, Herb Schrayshuen, at 404-446-2560 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Standard Processes Manual:
http://www.nerc.com/files/Appendix_3A_Standard_Processes_Manual_Rev%201_20110825.pdf.

Index to Questions, Comments, and Responses

1. The SDT made changes to TOP-001-2 in response to industry comments and the Quality Review. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made? If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. 10
2. The SDT made changes to TOP-002-3 in response to industry comments and the Quality Review. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made? If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. 45
3. The SDT made changes to TOP-003-2 in response to industry comments and the Quality Review. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made? If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. 64
4. The SDT is suggesting the retirement of three requirements in PRC-001 since those requirements deal with data handling and can now be incorporated in the data specification concept suggested for TOP-003-2. Do you agree with the changes the drafting team has made? If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. 86
5. The VRF, VSL, and Time Horizons are part of a non-binding poll. Please indicate whether you agree or disagree with the VRF, VSL, and Time Horizon assignments. If you do not support these assignments or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. 92
6. If you have any other comments *on these standards that you have not already provided in response to the prior questions, please provide them here.* 100

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment											
				1	2	3	4	5	6	7	8	9	10		
1.	Group	Guy Zito	Northeast Power Coordinating Council												X
Additional Member		Additional Organization		Region	Segment Selection										
1.	Alan Adamson	New York State Reliability Council		NPCC	10										
2.	Greg Campoli	New York Independent System Operator		NPCC	2										
3.	Sylvain Clermont	Hydro-Quebec TransEnergie		NPCC	1										
4.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.		NPCC	1										
5.	Gerry Dunbar	Northeast Power Coordinating Council		NPCC	10										
6.	Mike Garton	Dominion Resources Services, Inc.		NPCC	5										
7.	Kathleen Goodman	ISO - New England		NPCC	2										
8.	David Kiguel	Hydro One Networks Inc.		NPCC	1										
9.	Michael Lombardi	Northeast Utilities		NPCC	1										
10.	Randy MacDonald	New Brunswick Power Transmission		NPCC	9										

Group/Individual	Commenter	Organization	Registered Ballot Body Segment											
			1	2	3	4	5	6	7	8	9	10		
11. Bruce Metruck	New York Power Authority	NPCC 6												
12. Lee Pedowicz	Northeast Power Coordinating Council	NPCC 10												
13. Robert Pellegrini	The United Illuminating Company	NPCC 1												
14. Si-Truc Phan	Hydro-Quebec TransEnergie	NPCC 1												
15. David Ramkalawan	Ontario Power Generation, Inc.	NPCC 5												
16. Brian Robinson	Utility Services	NPCC 8												
17. Saurabh Saksena	National Grid	NPCC 1												
18. Michael Schiavone	National Grid	NPCC 1												
19. Wayne Sipperly	New York Power Authority	NPCC 5												
20. Tina Teng	Independent Electricity System Operator	NPCC 2												
21. Donald Weaver	New Brunswick System Operator	NPCC 2												
22. Ben Wu	Orange and Rockland Utilities	NPCC 1												
23. Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC 3												
2.	Group	Ron Sporseen	PNGC Group Comments											
			X		X	X						X		
	Additional Member	Additional Organization	Region	Segment Selection										
1.	Joe Jarvis	Blachly-Lane Electric Cooperative	WECC	3										
2.	Dave Markham	Central Electric Cooperative	WECC	3										
3.	Dave Hagen	Clearwater Power Company	WECC	3										
4.	Roman Gillen	Consumers Power Inc.	WECC	1, 3										
5.	Roger Meader	Coos-Curry Electric Cooperative	WECC	3										
6.	Dave Sabala	Douglas Electric Cooperative	WECC	3										
7.	Bryan Case	Fall River Electric Cooperative	WECC	3										
8.	Ray Ellis	Lincoln Electric Cooperative	WECC	3										
9.	Annie Terracciano	Norther Lights Inc.	WECC	3										
10.	Aleka Scott	PNGC	WECC	4										
11.	Heber Carpenter	Raft River Rural Electric Cooperative	WECC	3										
12.	Steve Eldrige	Umatilla Electric Cooperative	WECC	1, 3										
13.	Marc Farmer	West Oregon Electric Cooperative	WECC	4										
14.	Margaret Ryan	PNGC	WECC	8										
3.	Group	Emily Pennel	Southwest Power Pool Regional Entity										X	
	Additional Member	Additional Organization	Region	Segment Selection										

Group/Individual	Commenter	Organization	Registered Ballot Body Segment											
			1	2	3	4	5	6	7	8	9	10		
1. John Allen	City Utilities of Springfield	SPP	1, 4											
2. Jake Burger	Nebraska Public Power District	MRO	1, 3, 5											
3. Doug Callison	Grand River Dam Authority	SPP	1, 3, 5											
4. Gary Cox	Southwestern Power Administration	SPP	1, 5											
5. David Dieterich	Omaha Public Power District	MRO	1, 3, 5											
6. Kim Donghyeon	Burns & McDonald	NA - Not Applicable	NA											
7. Allan George	Sunflower Electric Power Corporation	SPP	1											
8. Bo Jones	Westar Energy	SPP	1, 3, 5, 6											
9. Allen Klassen	Westar Energy	SPP	1, 3, 5, 6											
10. Tiffany Lake	Westar Energy	SPP	1, 3, 5, 6											
11. Paul Lampe	City of Independence, Power & Light Department	SPP	3											
12. Julie Lux	Westar Energy	SPP	1, 3, 5, 6											
13. Greg McAuley	Oklahoma Gas & Electric	SPP	1, 3, 5											
14. Kyle McMenamin	Xcel Energy	SPP	1, 3, 5, 6											
15. Valerie Pinamonti	American Electric Power	SPP	1, 3, 5											
16. Terry Pyle	Oklahoma Gas & Electric	SPP	1, 3, 5											
17. Randy Root	Grand River Dam Authority	SPP	1, 3, 5											
18. Mahmood Safi	Omaha Public Power District	MRO	1, 3, 5											
19. Sean Simpson	Board of Public Utilities, City of McPherson	SPP	1, 3, 5											
20. Angela Summer	Southwestern Power Administration	SPP	1, 5											
21. Jim Useldinger	Kansas City Power & Light	SPP	1, 3, 5, 6											
4. Group	Jesus Sammy Alcaraz	Imperial Irrigation District (IID)		X		X	X	X	X					
Additional Member Additional Organization Region Segment Selection														
1. Alfonso Juarez III	IID	WECC	1, 3, 4, 5, 6											
2. Joel Fugett	IID	WECC	1, 3, 4, 5, 6											
5. Group	Connie Lowe	Dominion		X		X		X	X					
Additional Member Additional Organization Region Segment Selection														
1. Louis Slade		RFC	5											
2. Mike Garton		MRO	5											
3. Michael Crowley		SERC	1, 3, 5, 6											
6. Group	WILL SMITH	MRO NSRF		X	X	X	X	X	X					X

Group/Individual	Commenter	Organization	Registered Ballot Body Segment											
			1	2	3	4	5	6	7	8	9	10		
Additional Member Additional Organization Region Segment Selection														
1.	MAHMOOD SAFI	OPPD	MRO	1, 3, 5, 6										
2.	CHUCK LAWRENCE	ATC	MRO	1										
3.	TOM WEBB	WPS	MRO	3, 4, 5, 6										
4.	JODI JENSON	WAPA	MRO	1, 6										
5.	KEN GOLDSMITH	ALTW	MRO	4										
6.	ALICE IRELAND	XCEL/NSP	MRO	1, 3, 5, 6										
7.	DAVE RUDOLPH	BEPC	MRO	1, 3, 5, 6										
8.	ERIC RUSKAMP	LES	MRO	1, 3, 5, 6										
9.	JOE DEPOORTER	MGE	MRO	3, 4, 5, 6										
10.	SCOTT NICKELS	RPU	MRO	4										
11.	TERRY HARBOUR	MEC	MRO	3, 4, 5, 1										
12.	MARIE KNOX	MISO	MRO	2										
13.	LEE KITTELSON	OTP	MRO	1, 3, 4, 5										
14.	SCOTT BOS	MPW	MRO	1, 3, 5, 6										
15.	TONY EDDLEMAN	NPPD	MRO	1, 3, 4										
16.	MIKE BRYTOWSKI	GRE	MRO	1, 3, 5, 6										
17.	THERESA ALLARD	MPC	MRO	1, 3, 5, 6										
7.	Group	Brenda Hampton	Luminant							X				
Additional Member Additional Organization Region Segment Selection														
1.	Mike Laney	Luminant Generation Company LLC	ERCOT	5										
8.	Group	Robert Rhodes	SPP Standards Review Group		X									
Additional Member Additional Organization Region Segment Selection														
1.	John Allen	City Utilities of Springfield	SPP	1, 4										
2.	Jake Burger	Nebraska Public Power District	MRO	1, 3, 5										
3.	Doug Callison	Grand River Dam Authority	SPP	1, 3, 5										
4.	Gary Cox	Southwestern Power Administration	SPP	1, 5										
5.	David Dieterich	Omaha Public Power District	MRO	1, 3, 5										
6.	Kim Donghyeon	Burns & McDonald	NA - Not Applicable	NA										
7.	Allan George	Sunflower Electric Power Corporation	SPP	1										
8.	Bo Jones	Westar Energy	SPP	1, 3, 5, 6										

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
9.	Allen Klassen	Westar Energy	SPP	1, 3, 5, 6																
10.	Tiffany Lake	Westar Energy	SPP	1, 3, 5, 6																
11.	Paul Lampe	City of Independence, Power & Light Department	SPP	3																
12.	Julie Lux	Westar Energy	SPP	1, 3, 5, 6																
13.	Greg McAuley	Oklahoma Gas & Electric	SPP	1, 3, 5																
14.	Kyle McMenamin	Xcel Energy	SPP	1, 3, 5, 6																
15.	Valerie Pinamonti	American Electric Power	SPP	1, 3, 5																
16.	Terry Pyle	Oklahoma Gas & Electric	SPP	1, 3, 5																
17.	Randy Root	Grand River Dam Authority	SPP	1, 3, 5																
18.	Mahmood Safi	Omaha Public Power District	MRO	1, 3, 5																
19.	Sean Simpson	Board of Public Utilities, City of McPherson	SPP	1, 3, 5																
20.	Angela Summer	Southwestern Power Administration	SPP	1, 5																
21.	Jim Useldinger	Kansas City Power & Light	SPP	1, 3, 5, 6																
9.	Group	Steve Rueckert	Western Electricity Coordinating Council																	X
No additional members listed.																				
10.	Group	Frank Gaffney	Florida Municipal Power Agency	X		X	X	X	X											
Additional Member Additional Organization Region Segment Selection																				
1.	Timothy Beyrle	City of New Smyrna Beach	FRCC	4																
2.	Jim Howard	Lakeland Electric	FRCC	3																
3.	Greg Woessner	Kissimmee Utility Authority	FRCC	3																
4.	Lynne Mila	City of Clewiston	FRCC	3																
5.	Joe Stonecipher	Beaches Energy Services	FRCC	1																
6.	Cairo Vanegas	Fort Pierce Utility Authority	FRCC	4																
7.	Randy Hahn	Ocala Utility Services	FRCC	3																
11.	Group	Chris Higgins	Bonneville Power Administration	X		X		X	X											
Additional Member Additional Organization Region Segment Selection																				
1.	Ted	Snodgrass	WECC	1																
2.	Tim	Loepker	WECC	1																
3.	John	Anasis	WECC	1																
4.	Deanna	Phillips	WECC	1, 3, 5, 6																
5.	Rebecca	Berdahl	WECC	3																

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
6.	Erika	Doot	WECC	3, 5, 6									
7.	Kristy	Humphrey	WECC	1									
8.	Don	Watkins	WECC	1									
9.	Fran	Halpin	WECC	5									
12.	Group	Michael Gammon	Kansas City Power & Light		X		X		X	X			
Additional Member Additional Organization Region Segment Selection													
1.	Jessi Tucker	Kansas City Power & Light	SPP	1, 3, 5, 6									
2.	Jim Useldinger	Kansas City Power & Light	SPP	1, 3, 5, 6									
3.	Harold Wyble	Kansas City Power & Light	SPP	1, 3, 5, 6									
13.	Individual	Jim Eckelkamp	Progress Energy		X		X		X	X			
14.	Individual	Janet Smith, Regulatory Affairs Supervisor	Arizona Public Service Company		X		X		X	X			
15.	Individual	Antonio Grayson`	Southern Company		X		X		X	X			
16.	Individual	Molly Devine	Idaho Power Company		X								
17.	Individual	Joe Couturier	SSOE Group										
18.	Individual	Michael Falvo	Independent Electricity System Operator			X							
19.	Individual	Andrew Gallo	City of Austin dba Austin Energy		X		X	X	X	X			
20.	Individual	Daniel Duff	Liberty Electric Power LLC					X					
21.	Individual	Michelle D'Antuono	Ingleside Cogeneration LP					X					
22.	Individual	Rich Salgo	NV Energy		X		X		X				
23.	Individual	Joe Petaski	Manitoba Hydro		X		X		X	X			
24.	Individual	Andrew Z. Pusztai	American transmission Company		X								
25.	Individual	Greg Rowland	Duke Energy		X		X		X	X			
26.	Individual	Keira Kazmerski	Xcel Energy		X		X		X	X			
27.	Individual	Larry Raczkowski	FirstEnergy Corp		X		X	X	X	X			
28.	Individual	Terry Harbour	MidAmerican Energy		X		X		X	X			
29.	Individual	Texas Reliability Entity	Texas Reliability Entity										X
30.	Individual	Darryl Curtis	Oncor Electric Delivery		X								

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
31.	Individual	Eric Salsbury	Consumers Energy			X	X	X					
32.	Individual	Randall McCamish	City of Vero	X		X							
33.	Individual	J. S. Stonecipher, PE	Beaches Energy Services of theCity of Jacksonville Beach, Florida	X								X	
34.	Individual	Gregory Campoli	New York Independent System Operator		X								
35.	Individual	Patrick Brown	Essential Power, LLC					X					
36.	Individual	Tony Jankowski	Wisconsin Electric Power Company			X	X	X					
37.	Individual	Kathleen Goodman	ISO New England Inc	X	X	X		X	X				
38.	Individual	Brian J Murphy	NextEra Energy, Inc.	X		X		X	X				
39.	Individual	Russell A. Noble	Cowlitz County PUD			X	X	X					
40.	Individual	Thomas E. Foltz	AEP										
41.	Individual	Jason Marshall	ACES Power Marketing										

1. The SDT made changes to TOP-001-2 in response to industry comments and the Quality Review. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made? If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

Summary Consideration: The majority of the comments received requested clarification or explanation of why the SDT did what it did. Only one change, to the Time Horizon for Requirement R1, was made due to comments.

Several commenters remarked that there was a potential problem with relying on a definition being developed in another project that wasn't approved as yet. As has been explained previously, the SDT is working closely with the Reliability Coordination Standard Drafting Team (RC SDT) that is responsible for defining the term 'Reliability Directive'. The use of that term within this standard is somewhat generic in nature. The SDT believes that the progress in developing the definition is sufficient to warrant continued progress of Project 2007-03 without significant concerns of wasted effort or time. And, as shown in the Implementation Plan, the two projects will be filed at FERC together in one package.

R1. Each Balancing Authority, Generator Operator, Distribution Provider, and Load-Serving Entity shall comply with each Reliability Directive issued and identified as such by its Transmission Operator(s), unless such action would violate safety, equipment, regulatory, or statutory requirements. [Violation Risk Factor: High] [Time Horizon: ~~Operations-Planning~~, Same-day Operations, Real-Time Operations]

Organization	Yes or No	Question 1 Comment
Kansas City Power & Light Co.	Negative	Comments and concerns with the proposed standards have been expressed within the NERC comment form
American Electric Power	Negative	Comments are being submitted via electronic form by Thad Ness on behalf of American Electric Power.
Florida Municipal Power Agency	Negative	Please see FMPA comments submitted separately.
Xcel Energy, Inc.	Negative	Please refer to Xcel Energy's filed comments related to this project.

Organization	Yes or No	Question 1 Comment
Manitoba Hydro	Negative	Please see comments submitted by Joe Petaski (Manitoba Hydro)
Bonneville Power Administration	Negative	See BPA's submitted comments
Wisconsin Electric Power Co.	Negative	See WE group comments
Xcel Energy, Inc.	Negative	Xcel Energy submitted comments in Standard Comment Form.
FirstEnergy Energy Delivery, FirstEnergy Solutions	Affirmative	FE appreciates the hard work of the standards drafting team. Please see additional comments and suggestions submitted through the formal comment period.
Ohio Edison Company	Affirmative	FE appreciates the hard work of the standards drafting team. Please see additional comments and suggestions submitted through the formal comment period.
Response: Thank you for submitting comments. Responses to your comments are addressed below.		
ReliabilityFirst Corporation	Abstain	ReliabilityFirst abstains and offers the same comments as submitted via the previous comment posting period.
Response: The SDT points RFC to the responses posted for the previous posting. Without any further specific comments, the SDT has no further responses to offer.		
Brazos Electric Power Cooperative, Inc.	Negative	Additional clarification is necessary that warrants our negative vote. See the issues raised in the comments by ACES Power Marketing.
ACES Power Marketing	No	We generally agree with TOP-001 and the changes since the last posting. However, we continue to believe that use of the language “know or expected to be” in Requirement R3 is confusing and that this is a case where brevity is more effective in communicating the requirement. We believe striking this clause will improve the clarity of the requirement. As

Organization	Yes or No	Question 1 Comment
		<p>the clause is written now, it is not clear to whom it applies? We assume the SDT intended for the notification to be based on the expectation or knowledge of the TOP to whom the requirement applies. However, the clause is not clear on this but is rather a statement that appears to be some general knowledge or expectation. This opens the possibility of an auditor substituting their expectation or knowledge over the applicable TOP.</p> <p>Requirement R5 has a similar issue.</p> <p>We are concerned that the examples listed in Requirement R5 may be too simplistic and could be interpreted too literally. A change in load is one example. Thus, a simple reading of the requirement would imply that a Transmission Operator that has a 1 MW change in a 10,000 MW would be required to notify the Reliability Coordinator. Clearly, that is not what is intended. To resolve this issue, two solutions could be applied. One solution would be to state that changes must be significant. A second solution would be to strike the examples altogether.</p> <p>Requirements R10 and R11 are inconsistent. Requirement R10 states the Transmission Operator must inform the RC of “its actions” to mitigate an IROL or SOL that has been exceeded while Requirement R11 compels the Transmission Operator “to act or direct others to act” to mitigate an IROL or SOL that has been exceeded. While we consider that a Transmission Operator directing others to act is the same as taking action itself, it would appear Requirement R11 does not consider directed actions as the actions of the Transmission Operator. This would imply that Requirement R10 does not include communication of the directed actions since it applies to Transmission Operator actions. However, we do not believe exclusion of Transmission Operator actions was intended in Requirement R10. The simplest solution to align these two requirements more closely would be to</p>

Organization	Yes or No	Question 1 Comment
		<p>change “its” in Requirement R10 to “the”. In this way, Requirement R10 is not limited to only the actions taken directly by the Transmission Operator.</p> <p>The language in the Data Retention section regarding Requirements R7 and R9 needs to be made more consistent with the requirement. We are concerned that language could be interpreted as compelling the Transmission Operator to retain data for any IROL that is temporarily exceeded for a duration less than T_v or an SOL that is exceeded for a time that does not violate the criteria upon which it is based. Neither of these instances would represent a violation of either Requirement R7 or R9. Thus, the data is not necessary to be retained.</p> <p>Under the Compliance Enforcement Authority section, we suggest “entities” in the first bullet and “functional entities” in the second bullet should be changed to “registered entities”. This will make them consistent with one another and the function model. The “Reliability Functional Model Technical Document” describes a functional entity not as a specific company but rather a specific part of the functional model such as a Balancing Authority. Registered entities are specific companies. For example, SPP is a registered entity that works for their Regional Entity as the Reliability Coordinator functional entity.</p>
<p>Response: R3 & R5: The SDT disagrees. By utilizing the results of the required Operational Planning Analysis, the Transmission Operator will know what other entities are known or expected to be affected. Striking the clause will not provide clarity but open up other questions. No change made.</p> <p>R5: The use of the term ‘significant’ would not provide any additional clarity as it is still a subjective term open to interpretation. Merely striking the examples does not provide additional clarity either as it leaves the situation completely open to interpretation. The SDT believes that including the examples provides sufficient clarity. Any auditor trying to use a 1 MW change on a 10,000 MW system will be hard-pressed to justify their actions. No change made.</p> <p>R10: The SDT disagrees. If the commenter accepts that directing others to act is the same as taking action itself, then the SDT</p>		

Organization	Yes or No	Question 1 Comment
<p>asserts that Requirement R10 is aligned with Requirement R11. No change made.</p> <p>Data retention: The SDT believes that by incorporating a reference to the requirements in question within the data retention language that the concern expressed by the commenter is not an issue. No change made.</p> <p>CEA: The SDT is using language here that has been utilized in multiple standards projects to date and was supplied by staff as accepted language. Furthermore, the SDT does not agree that the suggested changes will provided any additional clarity. No change made.</p>		
Lakeland Electric	Negative	Please refer to comments submitted by FMPA.
Florida Municipal Power Pool	Affirmative	See FMPA Comments
<p>Florida Municipal Power Agency; City of Vero; Beaches Energy Services of the City of Jacksonville Beach, FL</p>	No	<p>The existing TOP-001-1 R7 essentially requires communication to the RC and neighboring TOPs any time a Facility is to be switched. The new TOP-001-2 R5 will only require such communication when such switching would result in an "Adverse Reliability Impact" defined as: "The impact of an event that results in frequency-related instability; unplanned tripping of load or generation; or uncontrolled separation or cascading outages that affects a widespread area of the Interconnection." This significantly reduces the requirements for communication / notification for switching Facilities. It is worthwhile to communicate switching of some Facilities whether or not they would result in an "Adverse Reliability Impact". Suggest rephrasing to something like any unplanned switching of Facilities not "noticed" through data provision of TOP-003-2. With the number of human error events that have occurred, we should not be reducing the communication / notification requirements.</p> <p>R8 is not needed since it is already covered in FAC-014-2 R5.2. As a result, R9, R10 and R11 ought to be modified to refer to FAC-014-2 rather than R8.</p>
<p>Response: R7: The SDT believes that notification for any switching event is contrary to good operating practice as it would load up the message queue with unnecessary information and could lead to an operator missing an important message within a large</p>		

Organization	Yes or No	Question 1 Comment
<p>group of unneeded messages. TOP-003-2 allows for an entity to request reliability-based information from another entity so they may include status on any piece of equipment that may possibly effect its operations. Therefore, the SDT does not agree that a reliability gap has been created. No change made.</p> <p>R8: The SDT notes that there are subtle differences in TOP-001-2 and FAC-014-2. FAC-014-2 provides a simple list of SOLs while TOP-001-2 is looking at particular SOLs that need special treatment. Therefore, there is no redundancy. No change made.</p>		
<p>Xcel Energy, Inc.</p>	<p>Negative</p>	<p>Drafting Team didn't address the Regional differences on the treatment of SOLs.</p> <p>R8 – Please clarify the difference between R8 of TOP-001-2, and R2 & R5 of FAC-014-2. We would expect in some regions, depending on the RC’s SOL methodology, that this would be the same information. For example, in SPP, all Facility Ratings are considered SOLs. Compliance with R9 of TOP-001-2 will prove quite difficult in regions like this. Please clarify what the drafting team envisions being the difference between these two standards, and what is expected to be given to the RC under each.</p> <p>R9 - We appreciate the drafting team’s efforts. However, we are still concerned that R9 will not allow the Transmission Operator the flexibility to identify the best SOL recovery approach, without incurring a violation of the requirement. Instead, the TOP may be forced to shed load in order to avoid violating the requirement. This is not ideal, especially when the situation could be mitigated successfully with alternative measures. It is not clear if an entity is allowed to use an RC-approved contingency plan to mitigate a situation that would cause a Facility Rating violation (i.e. the Facility Rating is the SOL), without also incurring a violation of R9. To further explain, if an entity foresees exceeding an SOL in its OPA, and obtains approval from the RC on their proposed contingency plan (which includes a Facility Rating violation), will that entity be considered in violation of R9 once the exceedance occurs and the contingency plan is implemented?</p>
<p>Response: The SDT does not agree that it is necessary to spell out any regional differences in the treatment of SOLs. The</p>		

Organization	Yes or No	Question 1 Comment
<p>requirements are generic in that respect as they should be. No change made.</p> <p>R8: The SDT believes that there are subtle differences in TOP-001-2 and FAC-014-2 that the commenter is missing. FAC-014-2 provides a simple list of SOLs while TOP-001-2 is looking at particular SOLs that need special treatment. Therefore, there is no redundancy. No change made.</p> <p>R9: There is nothing in this standard that ties the Transmission Operator to any particular plan or action so the SDT believes that the commenter’s fears are ungrounded. No change made.</p>		
National Association of Regulatory Utility Commissioners	Negative	Given the term Reliability Directive is being used as a defined term but does not yet exist as a defined term in the NERC Glossary and is not proposed to be a defined term in the Glossary with this proposal, it is premature to approve this revised standard.
Hydro One Networks, Inc.	Negative	The standard uses the term "Reliability Directive" which is currently and formally under development as part of another project. The posting states that this definition was agreed to by all affected project teams using it. However if the other project team formally charged with this definition's development, changes it, then this standard and perhaps others, will have to be revisited.
Utility Services, Inc.	Negative	There is use of the term "Reliability Directive" in the standard which is currently and formally under development as part of another project. The posting states that this definition was agreed to by all affected project teams using it, however if the other project team formally charged with this definition's development, changes it, then this standard and perhaps others, will have to be revisited. Bringing these standards forward seems inefficient and problematic.
<p>Response: The SDT appreciates your concerns, but has always intended to deal with the coordination issue involved here in a decisive manner. As has been explained previously, the SDT is working closely with the RC SDT that is responsible for defining the term ‘Reliability Directive’. The use of that term within this standard is somewhat generic in nature. The SDT believes that the</p>		

Organization	Yes or No	Question 1 Comment
<p>progress in developing the definition is sufficient to warrant continued progress of Project 2007-03 without significant concerns of wasted effort or time. The RTO SDT (Project 2007-03) and the RC SDT's project (Project 2006-06) will be filed together at FERC. No change made.</p>		
<p>Santee Cooper</p>	<p>Negative</p>	<p>In R8, SOLs are identified according to each entity's SOL methodology. This requirement seems to assume a certain methodology for identifying SOLs. Local area issues such as the examples cited in the rationale may not be of consequence to the BES and not considered an SOL. Also, over-communication of local area issues to the RC will inundate them and could become a detriment to the reliability of the BES. We believe that entities should be allowed to report SOLs according to their required methodology they have established.</p> <p>What was the rationale of reducing the implementation time from twenty-four months to twelve months?</p>
<p>Response: R8: SOLs are developed through a required methodology in FAC-014-2. Nothing in TOP-001-2 changes that fact. Requirement R8 is intended solely for those SOLs, that while not IROLs, are more important to the Transmission Operator Area than a typical SOL would be. No change made.</p> <p>IP: The effective date was changed following numerous comments to the sixth posting that asserted the implementation plan would take excessive time and needed to be shortened. It was also based on the fact that the proposed requirements represent what is already being done in the field in many areas.</p>		
<p>INTELLIBIND</p>	<p>Negative</p>	<p>Inclusion of "examples" is not appropriate and leads to a compliance conflict on whether these examples must be addressed or not.</p> <p>R8, 9 and 11 place unneeded additional burden on entities to prove they are properly complying.</p>
<p>Response: The SDT believes that the language of the requirement (and examples) is such that that the commenter's fears are unwarranted and will not lead to conflict. No change made.</p>		

Organization	Yes or No	Question 1 Comment
<p>The commenter has not supplied any information on the details of why there is an unneeded burden. Therefore, the SDT is unable to reply. Proof of compliance with a requirement is part of a mandatory compliance mechanism. In recognition of this compliance burden, the requirements mentioned were carefully crafted with the end in view that a registered entity should be able to affirmatively prove compliance. No change made.</p>		
<p>MidAmerican Energy Co.</p>	<p>Negative</p>	<p>NERC standards cannot be vague and undefined or NERC interprets the standard and creates new requirements through the Compliance Application Notice process. The rationale specified for R8 shows that R8 deals with a Transmission Operator defined special subset of SOLs. However, the current wording in R8 does not use the wording "special subset of SOLs as defined by the TOP". The standard uses "as supporting reliability internal to its Transmission Operator Area based on its assessment of its Operational Planning Analysis". This is not clear enough for a black and white compliance audit and therefore is inadequate.</p> <p>Further in R9 continuous duration remains undefined. Therefore, specific wording needs to be added to show that R9 applies to the "special subset of SOLs with their corresponding continuous duration timeframes as defined by the TOP".</p> <p>Last, the the same wording and definition must be applied to FAC-011-2 R2 to remain consistent and clear.</p>
<p>Response: The rationale is simply an explanation of Requirement R8 and is intended to ensure that the responsible entity and auditor understand the requirement – it is the language in the requirement, not the language in the text box, that is enforceable. Therefore, there is no inconsistency in the wording. No change made.</p> <p>Continuous duration is a common term and the Webster’s dictionary meanings can and should be applied. The reference in Requirement R9 to Requirement R8 makes it clear as to what is being referenced. No change made.</p> <p>The SDT has reviewed FAC-011-2, Requirement R2 and does not believe that any changes are required in order to maintain consistency as the methodology hasn’t been changed. No change made.</p>		

Organization	Yes or No	Question 1 Comment
Detroit Edison Company	Negative	<p>R3- The sentence should read "... inform its Reliability Coordinator and other Transmission Operator(s), ..." The word other is missing in the current draft.</p> <p>R6- The statement "... negatively impacted interconnected NERC registered entities..." is to vague. This could be an easy trip up during an audit.</p> <p>M6- same as R6- The statement "... negatively impacted interconnected NERC registered entities..." is to vague.</p> <p>VSLs- R6- The statement "... negatively impacted interconnected NERC registered entities..." is to vague.</p>
<p>Response: R3: The SDT asserts that 'other' is understood and no additional clarity would be provided by adding it. No change made.</p> <p>R6, M6, & VSL: The SDT believes that a 'negatively impacted' entity is clear and not vague. No change made.</p>		
Westar Energy	Negative	SDT has not adequately addressed previous comments.
<p>Response: Without specifics, the SDT is unable to respond.</p>		
Wisconsin Electric Power Marketing; Wisconsin Energy Corp.	Negative	<p>The SDT's response for previous comments on R6 is that "The intent of the requirement is to notify those entities that are directly affected by the telemetry outage. " If that is the intent of the requirement then the requirement should state that.</p> <p>Also, "negatively impacted" needs to have some sort of bounds. Loss of \$1 in revenue is a negative impact.</p>
<p>Response: The SDT believes that the intent is clear and that no further explanation is required. No change made.</p> <p>As the requirement is dealing with telemetry outages, the impact is in loss of data and information as it relates to reliability. Revenue is not within the scope of reliability standards. No change made.</p>		

Organization	Yes or No	Question 1 Comment
<p>Commonwealth of Massachusetts Department of Public Utilities</p>	<p>Negative</p>	<p>There is use of the term "Reliability Directive" in the standard which is currently and formally under development as part of another project. The posting states that this definition was agreed to by all affected project teams using it, however if the other project team formally charged with this definition's development, changes it, then this standard and perhaps others, will have to be revisited. Bringing these standards forward seems inefficient and problematic for many.</p> <p>Also in Requirement 8 there was an issue expressed by one RSC member that System Operating Limits are local limits and should not be subject of part of the NERC standards and the requirement as written creates a "subset" of SOLs that affect reliability. This could create an overly complicated standard and could lead to compliance difficulties.</p>
<p>Response: As has been explained previously, the SDT is working closely with the RC SDT that is responsible for defining the term 'Reliability Directive'. The use of that term within this standard is somewhat generic in nature. The SDT believes that the progress in developing the definition is sufficient to warrant continued progress of Project 2007-03 without significant concerns of wasted effort or time. The RTO SDT (Project 2007-03) and the RC SDT project (Project 2006-06) will be filed together at FERC. No change made.</p> <p>The SDT does not believe that Requirement R8 creates an overly complicated standard or creates compliance difficulties. This requirement was added quite some time ago at the behest of industry as shown in earlier posted comments. There is nothing complicated about it and it is in the control of the Transmission Operator as to how to proceed. No change made.</p>		
<p>Texas Reliability Entity</p>	<p>No</p>	<p>1) Definitions: Texas RE does not agree with the proposed definition of "Reliability Directive" and encourages the SDT to look past a compliance based outlook regarding the word "directive". If there is no Reliability Standard support for use of directives to AVOID emergencies, emergencies will continue to occur. Consider using the broader defined term "Operating Communication" from COM-003 rather than "Reliability Directive" in this standard.</p>

Organization	Yes or No	Question 1 Comment
		<p>2) R1: This requirement, as written, states that the BA, GOP, DP, and LSE must comply with Reliability Directives, which, by definition, are only issued in Emergencies or to prevent instability or Cascading. There is not a requirement in the TOP or IRO standards that obligates a Registered Entity to comply with other directives issued by the TOP or RC used in operating the grid in a reliable manner. For example, some generator operators exceed the operating basepoint that is communicated to the unit by the ISO, which creates congestion and overloads the transmission system. Under the proposed R1 language, there is no requirement for an entity to comply with this type of directive, since it is not a “Reliability Directive” until an Emergency occurs.</p> <p>3) R3: Requirement R3 seems to be missing some words. It doesn’t say WHAT the TOP should inform other entities about. Also, it is not clear if this requirement is supposed to be about planning (“expected to be affected by anticipated Emergencies”) or real-time operations (“known to be affected by actual Emergencies”) or both. If the latter is intended, the Time Horizon should include Real-Time Operations and Same Day Operations. We suggest changing the language to “Each Transmission Operator shall inform its Reliability Coordinator and other affected Transmission Operator(s) about each actual or anticipated Emergency , which may be determined in Real-time or based on its assessment of its Operational Planning Analysis”</p> <p>4) R4: Reinsert Generator Operator applicability from old R6. The stated reason for removal of Generator Operator is incorrect and violates the Functional Model which states that a Balancing Authority may direct “resources (Generator Operators and Load-Serving Entities) to take action to ensure balance in real time” and “direct “Generator Operators to implement redispatch for congestion management”. Both of those type actions may include rendering emergency assistance.</p> <p>5) R5: The requirement implies, but does not specifically state a time frame</p>

Organization	Yes or No	Question 1 Comment
		<p>for informing the RC. The RC must be informed in sufficient time in order to respond to the system condition. The phrase “unless conditions do not permit” is ambiguous and should be made more definite. We suggest rewriting R5 as follows: “Each Transmission Operator shall inform its Reliability Coordinator and other Transmission Operators of its operations known or expected to result in an Adverse Reliability Impact on those respective Transmission Operator Areas within a timeframe that is sufficient for the RC and affected Transmission Operators to respond to the system condition, unless communication capabilities have failed.” The Time Horizon should also include Operations Planning since the Requirement language includes “known or expected.”</p> <p>6) R6: There is a need to include Generator Operator in this requirement. There is no clarification in the mapping document regarding the loss of the applicability to the Generator Operator (previously in TOP-001-1 R3).</p> <p>7) R8: This requirement, as written, states that the TOP must inform the RC of SOLs based on its assessment of its Operational Planning Analysis, which, by definition, is an analysis for the next day’s operation that may occur either a day ahead or as much as 12 months ahead. SOL violations can occur in Real-Time (e.g., transmission thermal limit violations, voltage violations, etc.) due to forced outages from storms or equipment failures that may not have been studied under the Next-Day analysis and various other real time conditions. We suggest rewording the requirement to read “Each Transmission Operator shall inform its Reliability Coordinator of each SOL which, while not an IROL, has been identified by the Transmission Operator as supporting reliability internal to its Transmission Operator Area based ON ANTICIPATED OR ACTUAL EMERGENCIES OCCURRING IN REAL-TIME OR BASED on its assessment of its Operational Planning Analysis.” It is important to recognize the Real-Time issues because several of the Requirements following Requirement 8 refer to SOLs “identified in Requirement R8.” Additionally, since the definition of SOL includes post-</p>

Organization	Yes or No	Question 1 Comment
		<p>contingency criteria, contingencies are not limited to Operational Planning Analysis timeframes. The VSL language also needs to accommodate Real-Time considerations.</p> <p>8) R9: See our comment regarding R8 - there is a reliability gap because SOLs identified in Real-Time (as opposed to those identified in the Operational Planning Analysis timeframe) are not included.</p> <p>9) R10: See our comment regarding R8 - there is a reliability gap in the actions needed to return the system to within limits for SOLs identified in Real-Time as opposed to those identified in the Operational Planning Analysis timeframe.</p> <p>10) R11: See our comment regarding R8 - there is a reliability gap for SOLs identified in Real-Time as opposed to those identified in the Operational Planning Analysis timeframe.11) What is the intended difference between “TOP shall not operate outside any SOL” in R9 and “TOP shall act or direct others to act to mitigate both the magnitude and the duration of exceeding . . . an SOL” in R11? The same action or inaction would likely result in violations of both requirements, resulting in a “double-jeopardy” situation.</p>
<p>Response: 1. The SDT is aware of the work being done with COM-003 as it has maintained close coordination with that SDT. In this case, the SDT believes that the requirements in TOP-001-2 best align with the use of Reliability Directive. Any problems with the proposed definition should be taken up with the RC SDT in Project 2006-06. No change made.</p> <p>2. The SDT believes that other market protocols, standards and operating protocols and mechanisms are in place today to take care of the type of situations that the commenter has noted. No change made.</p> <p>3. The SDT does not believe the suggested change adds any clarity. The SDT believes that it is clear as to what needs to be communicated. Since Operational Planning Analysis is generally analyzed at least a day ahead, the SDT, in response to numerous comments in the last posting, changed the Time Horizon to just Operations Planning. No change made.</p> <p>4. The SDT stands by its reasoning for deletion of the Generator Operator as consistent with the Functional Model v5. No change made.</p>		

Organization	Yes or No	Question 1 Comment
<p>5. The SDT does not believe that the suggested language provides any additional clarity. Requirement R5 is more pertinent to Real-time than Operations Planning which is covered in Requirement R3. No change made.</p> <p>6. There is no relevance between TOP-001-1, Requirement R3 which concerns reliability directives and this requirement which deals with telemetry outages. If a Generator Operator has telemetry outages it will be noted to the Transmission Operator or Balancing Authority and would be reported as part of their information. No Change made.</p> <p>7, 8, 9, & 10. The SDT believes that Operational Planning Analysis includes the study of Contingencies and as such will include scenarios that include such conditions as the commenter has pointed out. The SDT reminds the commenter that TOP-002-3 requires the study of all SOLs and that nothing has changed with regard to an entity’s responsibilities to operate a reliable system. TOP-001-2 is simply elevating a subset of SOLs to receive special attention. No change made.</p>		
Oncor Electric Delivery	No	<p>Oncor believes that the Reliability Coordinator is in the best position to determine who the negatively impacted interconnected registered entities are and to effectively coordinate communication efforts after receiving the initial planned outage request from the originating entity. In addition, the term “negatively impacted interconnected registered entities” is too broad and too subjective. As a result, we recommend R6 be revised to: Each Balancing Authority and Transmission Operator shall notify its Reliability Coordinator and negatively impacted interconnected NERC registered entities of planned outages of telemetering equipment, control equipment and associated communication channels between the affected entities.</p>
<p>Response: The SDT believes that the Transmission Operator can, and does, know who will be impacted by outages of telemetry equipment. Placing this responsibility at the Reliability Coordinator level would place an unnecessary burden on those entities and deflect them from their reliability responsibilities. No change made.</p>		
Bonneville Power Administration	No	<p>BPA does not believe that the drafting teams’ consideration of our previously submitted comments during the last round was adequate. The response appeared to be based on the assumption that the SOL or IROL was based on a thermal limit, not a stability limit. Since a system can go unstable in less than 1 second, the drafting team’s response that, “ratings</p>

Organization	Yes or No	Question 1 Comment
		<p>include the qualifiers of time...” did not make sense to us in the context of a “stability limit”. As stated in BPA’s previous comments, it takes a definite amount of time to readjust the system (change schedules, move generation, or perform other actions) in order to get actual flows down to reliable operating limits when flows have exceeded limits. The standards need to clearly articulate how much time the responsible entities have to accomplish this. The current standard TOP-004-2, R4 clearly articulates a 30 minute rule for this. TOP-001 needs to do the same, especially if TOP-001 will replace TOP-004-2. Previous Comments: Given the potential uncertainty regarding the 30 Minute Rule, BPA suggests adding more clarity to the standard TOP-001-2 as the new draft could be interpreted to mean that one would need to get the flows below the SOL immediately. BPA believes this is not practical because it takes a definite amount of time to change schedules, move generation, or perform other actions in order to reduce loadings on facilities. BPA believes the new draft should include guidance as to how much time the BA or Transmission Operator would be allowed in order to reduce flows when there is an SOL violation. BPA suggests that more clarity be provided and/or the 30 minute rule be added back to the standard.</p> <p>Additional New Comments:TOP-001 introduces a new term and definition, Reliability Directive. This term is used in R1 of the standard in conjunction with two other defined terms, 'Emergency' and 'Adverse Reliability Impacts'. The time horizon described for R1 is 'Operations-Planning'. The timeframes for which this standard applies are 'Operations-Planning', 'Same-Day Operations' and 'Real-Time'. However, if we review the definitions associated with 'Emergency' and 'Adverse Reliability Impacts', it is clear that these terms are used for events that occur only during real time operations. BPA recommends that R1 be re-worded so that the Time Horizons are consistent with the terms used in the standard;</p> <p>that the Reliability Directive definition be clarified so that the timing of the</p>

Organization	Yes or No	Question 1 Comment
		<p>directive is identified;</p> <p>and that use of the terms 'Emergency' and 'Adverse Reliability Impact' be consistent with their definitions,</p> <p>and the 30 minute rule for getting actual flows back within a reliable limit be inserted.</p> <p>BPA recommends that the applicability of R6 be expanded to also include Generation Operators. The intent of this requirement is for those entities with “telemetry equipment, control equipment and associated communications channels” to coordinate outage of such equipment with its Reliability Coordinator and negatively impacted interconnected NERC registered entities. Though Generation Operators have such equipment, as written, this requirement does not require that the coordinate such outages in the same manner as Balancing Authorities and Transmission Operators are required to under this requirement.</p>
<p>Response: SOLs, by definition, include Stability ratings and those ratings, like all ratings, have a time element associated with them. Therefore, by using ratings and the time elements associated with them, the SDT has provided a definitive timeframe that will provide greater protection to system elements than what was previously stated as 30 minutes may be too long in certain situations. If a stability rating with a T_v of 1 second is the basis for an SOL, then no time in exceedance of the magnitude limit is allowable, and a Transmission Operator facing that issue would have plans in place to avoid exceedance of that limit. No change made.</p> <p>The SDT is in agreement with the commenter and has deleted Operations Planning from the Time Horizons. From the latest approved version of the Standards Process manual: “Time Horizon: The time period an entity has to mitigate an instance of violating the associated requirement.”</p> <p>R1. Each Balancing Authority, Generator Operator, Distribution Provider, and Load-Serving Entity shall comply with each Reliability Directive issued and identified as such by its Transmission Operator(s), unless such action would violate safety, equipment, regulatory, or statutory requirements. [Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-day Operations, Real-Time Operations]</p>		

Organization	Yes or No	Question 1 Comment
		<p>The SDT asserts that if a timing element is required for a Reliability Directive that the Reliability Directive will include such a timing element. No change made.</p> <p>With the change in the Time Horizons cited above, the terms are now consistent. No further change made.</p> <p>SOLs, by definition, include Stability ratings and those ratings, like all ratings, have a time element associated with them. Therefore, by using ratings and the time elements associated with them, the SDT has provided a definitive timeframe that will provide greater protection to system elements than what was previously stated as 30 minutes may be too long in certain situations. No change made.</p> <p>The SDT stands by its reasoning for deletion of the Generator Operator as consistent with the Functional Model v5. No change made.</p>
<p>PNGC Group Comments</p>	<p>No</p>	<p>Comments: The PNGC comment group believes there should be a distinction in the “Applicability” section of the standard distinguishing between “Scheduling DP/LSE” and “Non-scheduling DP/LSE”. PNGC members are small rural cooperatives that are “Full service BPA customers.” This means is that BPA is our power supplier and scheduling agent and therefore handles all scheduling, tagging, dispatching of resources and curtailments of load from breakers on BPA’s system for PNGC members. According to a letter from the WECC Reliability Coordinator (VRCC and LRCC) none of PNGC’s members will ever receive a “Reliability Directive”. Such a Directive would be sent to either a Balancing Authority (BA), or a Transmission Operator (TOP). In fact, the Bonneville Power Administration (BPA) is the BA and TOP for many of our members so R1 and R2 are nothing more than a clerical exercise for many DP/LSE entities. We estimate there are over 100 entities that are BPA Full Service customers that are in a similar position and making this standard applicable to them does nothing to enhance reliability. A simple declarative statement in the Applicability section of the standard could focus the intent of the SDT on those entities that need it while lessening the compliance risk and clerical burden for other entities that the standard should not apply to. We suggest:4.</p>

Organization	Yes or No	Question 1 Comment
		Applicability 4.1 Balancing Authority 4.2 Transmission Operator 4.3 Generator Operator 4.4 Distribution Provider: With Real-time Operations desk 4.5 Load-Serving Entity: With Real-time Operations desk
<p>Response: The SDT believes that the current wording is appropriate for a continent-wide standard. If an entity never receives a Reliability Directive then there is nothing for them to do. No change made.</p>		
Kansas City Power & Light	No	Continuous duration” in R9 is not a defined term and will cause uncertainty and debate under audit as to what time frame this represents. Recommend R9 be modified to reflect the time basis established through the methodology to develop the SOL for the applicable facilities. Suggested modification for R9:Each Transmission Operator shall not operate outside any System Operating Limit (SOL) identified in Requirement R8 for a continuous duration that exceeds the Facility Rating or Stability criteria upon which the SOL is based.
<p>Response: The SDT sees no additional clarity in the suggested wording change. Continuous duration is a common term and the Webster’s dictionary meanings can and should be applied. No change made.</p>		
MRO NSRF	No	For R9, the drafting team did not address “continuous duration”. Many entities had commented that the term is vague. Is continuous duration, 8 hours or 15 minutes? For IROL limit violations or Unknown State conditions, the entity has 30 minutes to mitigate the situation.
Great River Energy	Affirmative	Great River Energy agrees with the comments of the MRO NSRF
<p>Response: Continuous duration is a common term and the Webster’s dictionary meanings can and should be applied. No change made.</p>		
Idaho Power Company	No	I don’t think that this requirement should be retained. With e-tag requirements, mid-hour scheduling and the ability to process an emergency

Organization	Yes or No	Question 1 Comment
		tag at any time it seems like an interchange. What is emergency assistance?
<p>Response: Emergency assistance can mean many things such as a change in dispatch or load shed, etc., that do not result in a energy transaction or e-Tag. e-Tag is not a reliability-based tool and shouldn't be relied on to cover operating situations in Real-time. No change made.</p>		
Consolidated Edison Co. of New York	Affirmative	See NPCC group comments
Northeast Power Coordinating Council	No	<p>It is written in FAC-014-2 R5.2: R5.2. The Transmission Operator shall provide any SOLs it developed to its ReliabilityCoordinator and to the Transmission Service Providers that share its portion of theReliability Coordinator Area.This already mandates that the Transmission Operator provide its Reliability Coordinator SOLs. This requirement and TOP-001 R8 must be made to agree.As explained in the redline version of TOP-001: "Rationale: The class of SOL included in Requirements R8, R9, and R11 was created in response to industry comments that there were SOLs that deserved increased attention. Examples of such SOLs include WECC Path SOLs, SOLs on transmission facilities maintaining service to significant events or buildings, such as the stadium for major nationally televised events, prominent government buildings, and military installations."It is understood that the impacts of some SOLs may attract increased attention because of the operational implications of them being exceeded. It must also be realized that every SOL has a reliability impact. The added wording adds unneeded complication to the Requirement. Will the proposed requirement create a new class of SOLs that might include any that might be "intermittent" in nature, such as those occurring during televised events, etc.? This becomes a moving target, and it may become problematic for keeping track of those SOLs to which these requirements apply, i.e., those that require notification to the Reliability Coordinator, versus those which don't. Regardless, operator responses to any SOL's on their systems should</p>

Organization	Yes or No	Question 1 Comment
		<p>be the same in terms of swiftness and a sense of urgency.</p> <p>The phrase “supporting reliability internal” is used in R8. What constitutes “supporting reliability internal”? This may present compliance issues. Experience has shown that the use of the terms internal, external, local, wide area have presented auditing difficulties that generated documentation issues.</p>
<p>Response: The SDT asserts that there are subtle differences in TOP-001-2 and FAC-014-2. FAC-014-2 provides a simple list of SOLs while TOP-001-2 is looking at particular SOLs that need special treatment. Therefore, there is no conflict. No change made.</p> <p>The commenter is leaving out part of the phrase thus creating a problem in their mind where there is none if everything is taken in context. The whole phrase is “...supporting reliability internal to its Transmission Operator Area based on its assessment of its Operational Planning Analysis.” When shown in this complete version, the SDT asserts that it is clear as to what is meant and what needs to be done. No change made.</p>		
Manitoba Hydro	No	<p>Manitoba Hydro is voting negative on TOP-001-2 for the following reason:R8 and R9 - In the absence of the rationale box in the final approved version of the standard, R8 is extremely unclear. All SOL’s support reliability based on an assessment of operational planning.</p> <p>The requirement (R9) prohibits operation outside any SOL “for a continuous duration that would cause a violation of the Facility Rating or Stability criteria upon which it is based.” However, by NERC definition an SOL is based upon Facility Rating and Stability Criteria, so operating outside the SOL is always going to violate the Facility Rating.</p> <p>The term continuous duration is undefined and as such makes the standard subject to interpretation. It would appear that the standard expects the system operator to do something more than would be done for an IROL.</p>
<p>Response: The SDT fails to see where the absence of a rationale box will make Requirement R8 unclear and the commenter provides no specifics for the SDT to respond to. The SDT believes that Requirement R8 is clear. No change made.</p>		

Organization	Yes or No	Question 1 Comment
<p>The time element for mitigation of the problem is the key to Requirement R9 and the reason for the proposed wording. No change made.</p> <p>Continuous duration is a common term and the Webster’s dictionary meanings can and should be applied.</p>		
Consumers Energy	No	<p>The Reliability Directive definition is not strong enough and leaves too much to interpretation. We feel that the other requirements and items in the standard are acceptable and we could support this version if the definition had more clarity.</p>
<p>Response: Reliability Directive is being developed and defined by Project 2006-06 and the term is simply being utilized in this standard. The commenter should provide specific comments to Project 2006-06 during their next posting. No change made.</p>		
AEP	No	<p>In the previous comment period, AEP requested clarification on whether these requirements are in regards to pre-contingency monitoring or instead based on real-time flow. AEP assumed this was based on Real Time Flow, but we encouraged the drafting team to provide clarifying language to make it more clear to the reader. The drafting team responded by noting that IROLs have been defined as both pre-contingent and post-contingent, and that the exact definition of the IROL must be honored. However, no such clarifying language was added to the standard. Time and time again, industry has provided comments to standard drafting teams in an effort to help avoid CANS, Interpretation Requests, and to increase the consistency of interpretation by both CEA’s and industry. In this case, while the team provided insight in their comments, the resulting lack of changes to the standard still leave unnecessary ambiguity that could be easily addressed. Ambiguity of any kind deters from, rather than promotes, the reliability of the BES. Until such clarification is added to the standard itself, AEP cannot support the drafting team’s efforts in revising TOP-001-2.</p> <p>R1: The timeframe should be identified.</p>

Organization	Yes or No	Question 1 Comment
<p>Response: The SDT believes that the definition of IROL speaks for itself and therefore that no further explanation is required within the standard. No change made.</p> <p>The SDT believes that if a timing element is required for a Reliability Directive that the Reliability Directive will include such a timing element. No change made.</p>		
<p>New York Independent System Operator</p>	<p>No</p>	<p>The SDT did not provide reasonable assurance that documented determination of 'Reliability Directive' identification was sufficient to meet R1, in the absents of explicit identifcaation during every verbal communication. We believe it is not clear to an auditor that written procedures would be an adequate level of 'identification. A possible solution would be to add R1.1 and spell out that identification of Reliability Directive shall be communicated through approved procedures or verbal identification.</p> <p>In addition, Requirement 11 gives the TOP the authority to "...act or direct others to act..." to mitigate IROL and certain SOL exceedances. Is it the intent of the SDT that the TOP can direct any of the entities to which this standard is applicable?</p> <p>Also SDT should consider a change to say "... act or issue a Reliability Directive to' This ties the requirement back to R1 with an obligation to complete the directive.</p> <p>The NYISO is also concern with the use of the definition of 'Reliability Directive' that has not been approved. We recommend balloting TOP-001 simultaneously with the RC Project that includes the definition. As it stands we support the proposed definition.</p>
<p>Response: Communication of Reliability Directives is governed by the COM standards. Comments on same should be directed to Project 2006-06 the next time that project posts for comment. TOP-001-2 uses the term and says nothing about how it is implemented. No change made.</p>		

Organization	Yes or No	Question 1 Comment
<p>It is the intent of the SDT that the Transmission Operator can direct any entity shown in applicability.</p> <p>The SDT sees no additional clarity being provided with the suggested change. No change made.</p> <p>The TOP standards will be filed at FERC jointly with the Project 2006-06.</p>		
SSOE Group	No	<p>TOP-001-2Grammatical: R8 and its supporting rationale refers to a term SOL. The term is 'defined' later in R9. The 'definition' should probably be defined at the time of its first usage.</p> <p>R11 The TO directs someone to do something. However, who is directed is not defined. Is it directed to the RC?</p>
<p>Response: Agree – the SDT moved the definition of the acronym from Requirement R9 to Requirement R8.</p> <p>It is directed to the entity that the Transmission Operator believes can correct or help to correct the problem. Since that entity can't be identified ahead of time in a standard, the SDT believes it is best left as is. No change made.</p>		
Duke Energy	No	<p>While the drafting team has made several improvements to this standard, we believe these additional changes are needed:</p> <ul style="list-style-type: none"> o The definition of Reliability Directive includes the defined term “Adverse Reliability Impact”, which should be replaced by the actual wording of latest (8/4/2011) BOT-approved definition of “Adverse Reliability Impact”, since it has NOT yet been approved by FERC. o R3 places the responsibility on a Transmission Operator to possess tools it does not currently utilize. Most companies will study their own area and possibly one or two busses out. In order to be compliant to this standard, it would appear a Transmission Operator would need to possess study tools which are currently utilized by the Reliability Coordinator. Suggest considering adopting language where the Transmission Operator requests assistance in identifying impacts outside their direct interconnects. Suggested rewording: “Each Transmission Operator shall work in

Organization	Yes or No	Question 1 Comment
		<p>conjunction with its respective Reliability Coordinator to inform other Transmission Operator(s) that are known or expected to be affected by each actual and anticipated Emergency based on its assessment of its Operational Planning Analysis. [Violation Risk Factor: High] [Time Horizon: Operations Planning.]”</p> <p>o R4, as written, does not consider an entity that might be under the control of an RTO. A Transmission Operator, as a member of an RTO, cannot take actions without the permission unless during an emergency where cascading outages, loss of equipment etc. is involved. If the event described in R4 as currently written is not an immediate emergency, the Transmission Operator would need to gain permission of the RTO to comply. Suggest wording changes to take into consideration entities whose facilities are under RTO control. Suggested rewording: “Each Transmission Operator shall render emergency assistance to other Transmission Operators, as requested and available, provided that appropriate agreements are in place, and the requesting entity has implemented its comparable emergency procedures, unless such actions would violate safety, equipment, regulatory, or statutory requirements. In the event the Transmission Operator is under the purview of a Regional Transmission Organization (RTO), the Reliability Coordinator of the RTO shall work with its Transmission Operators in requesting available emergency assistance. [Violation Risk Factor: High] [Time Horizon: Real-Time Operations]”.</p> <p>o R5 - Similar comment to R3. This requirement places the responsibility on a Transmission Operator to possess tools it does not currently utilize. Most companies will study their own area and possibly one or two busses out. In order to be compliant to this standard, it would appear a Transmission Operator would need to possess study tools which are currently utilized by the Reliability Coordinator. Suggest considering adopting language where the Transmission Operator requests assistance in identifying impacts outside their direct interconnects. Suggested rewording: “Each</p>

Organization	Yes or No	Question 1 Comment
		<p>Transmission Operator shall inform its Reliability Coordinator, who shall assist in identifying other Transmission Operators of its operations that are known or expected to result in an Adverse Reliability Impact on those respective Transmission Operator Areas unless conditions do not permit such communications. Examples of such operations include but are not limited to relay or equipment failures, and changes in generation, Transmission, or Load. [Violation Risk Factor: High] [Time Horizon: Same-day Operations, Real-Time Operations]”.</p> <ul style="list-style-type: none"> o R6 - Strike the word “negatively”, since no one will be “positively” impacted. o R6 needs to be clarified as to the intent. Does registered entity mean the corporation, or does registered entity mean a TO, BA etc. Suggestion would be to remove NERC registered from the language. o R8 - The SDT has included a Rationale for SOLs that deserve increased attention. Several examples cited in the Rationale are for service to local load, and while the local loads may be important loads, the associated SOLs would have no impact on BES reliability. R8 requires the TOP to inform the RC of such SOLs, and we question why the RC needs to be informed of SOLs that only impact service to local loads. We believe that the phrase “supporting its internal area reliability” should be further clarified in some way. The inclusion of the undefined concept of “supporting internal area reliability” creates undue compliance risk, since auditors could potentially find an entity non-compliant if no SOLs have been identified as “supporting its internal area reliability”. With no clarification, it is conceivable that every SOL on a TOP’s system could be considered to support its “internal area reliability”. Communicating all SOLs would inundate the RC with unneeded information, which we believe would be detrimental to reliability. If this requirement stays in the standard, it needs to be reworded to indicate that any SOLs identified are identified at the sole discretion of the TOP.

Organization	Yes or No	Question 1 Comment
		<ul style="list-style-type: none"> o R8 - Change the phrase “as supporting” to “in support of”. o R9 - Strike the word “would” and add an “s” to “cause”.
<p>Response: R1: Comments on the definition should be sent to Project 2006-06 the next time it posts. This project utilizes the proposed definition in a generic manner. No change made.</p> <p>R3 & R5: No tool other is specified in this standard and the modeling requirements for a Transmission Operator have not been changed by this standard. The Transmission Operator will be judged on the merits of its model elsewhere and would simply be applying that model here. No change made.</p> <p>R4: There is nothing in this standard that precludes a Transmission Operator from obtaining approval to take action if such approval is necessary. No change made.</p> <p>R6: While no one may be positively impacted there are any number of entities that won’t be impacted at all. ‘Negatively’ was added at the request of previous commenters and seems appropriate to the SDT. No change made.</p> <p>R6: NERC registered entity was added to the requirement due to comments in previous postings where commenters were concerned about limiting the reach of the requirement to non-NERC entities. The SDT believes that it is clear that messages are to be sent to appropriately identified entities.</p> <p>R8: The reason for the notification is that the specified SOLs are to be treated differently than other SOLs. The SDT believes that the Transmission Operator is uniquely qualified to determine such SOLs. No change made.</p> <p>R8 & R9: The SDT sees no additional clarity being provided by the suggested wording changes. No change made.</p>		
ReliabilityFirst Corporation	Abstain	ReliabilityFirst abstains and offers the same comments as submitted via the previous comment posting period.
<p>Response: The SDT points RFC to the responses posted for the previous posting. Without any further specific comments, the SDT has no further responses to offer.</p>		
Seattle City Light	Affirmative	The SDT made changes to TOP-001-2 in response to industry comments and the Quality Review. This includes all aspects of this standard - requirements, measures, and data retention. Do you agree with the changes the drafting

Organization	Yes or No	Question 1 Comment
		<p>team has made? If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.</p> <p>1 Yes Comments: R4. calls for rendering emergency assistance as requested and available to other TOPs, provided that the requesting entity has implemented its "comparable" emergency procedures. The word "comparable" is not very well defined so for example, if the requesting entity implemented load shedding to reduce line loading below SOL, would this requirement obligate the entity asked for assistance to shed its load as well because the load shedding option is almost always available? Please state the requirement more clearly.</p> <p>R11. calls for each Transmission Operator to act or direct OTHERS to act, to mitigate both the magnitude and duration of exceeding an IROL within the IROL's Tv, or of an SOL identified in Requirement R8, yet there are no requirements directing OTHERS to COMPLY with these directives. R.1 requires BA, GOP, DP and LSE to comply with the reliability directives issues by ITS Transmission Operator, but not by OTHER Transmission Operators. There could also be potential for confusion and double jeopardy if there are competing transmission paths or facilities supporting reliability internal to the Transmission Operators. It should be the Reliability Coordinator task to direct OTHERS to act to mitigate SOL violations.</p>
<p>Response: Comparable is a well defined term and the Webster's use is in play here. Comparable does not mean exactly and leaves the entity some flexibility in how to react. No change made.</p> <p>Requirement R1 does require compliance. The use of the term 'its' is appropriate as a transmission Operator can't issue orders to a Balancing Authority that is outside of its area. If such an order was deemed necessary, it would have to be relayed by that Balancing Authority's Transmission Operator thus 'its' is the appropriate term. No change made.</p>		
ISO New England, Inc.	Affirmative	TOP-001 Standard uses an undefined term "Reliability Directive" which is

Organization	Yes or No	Question 1 Comment
		<p>being proposed in the Reliability Coordinator Standards project. We believe that NERC should post these inter-related projects simultaneous in order to achieve industry support to move these important projects forward. If the RTO Project is approved, it should only be presented to the BOT simultaneously with an approved RC Standards project. Additionally, if the definition of "Reliability Directive" is modified in any way in the Reliability Coordinator Standards project, this would be a material change to this standard and could result in company's filing comments in opposition to FERC.</p>
<p>Response: As has been explained previously, the SDT is working closely with the RC SDT that is responsible for defining the term 'Reliability Directive'. The use of that term within this standard is somewhat generic in nature. The SDT believes that the progress in developing the definition is sufficient to warrant continued progress of Project 2007-03 without significant concerns of wasted effort or time. No change made.</p>		
City Utilities of Springfield, Missouri	Negative	City Utilities of Springfield, MO supports the comments from SPP.
Southwest Power Pool, Inc.	Affirmative	<p>We continue to disagree with the successive ballot process that forces entities to decide on a voting position concurrent with the submittal of comments on the same. NERC needs to explore other ways to expedite the voting/comment process without forcing industry to have faith that changes will be made after approval.</p> <p>Although SPP votes in favor of this standard, we have outstanding comments that should be addressed. We have submitted them in the standards process and reiterate some of them here.</p> <p>The Purpose Statement is too general and does not provide any direction of how the proposed standard will meet its stated intent. As written the Purpose Statement is applicable to any NERC standard that exists or can be imagined. We suggest additional wording of how this particular standard intends to do what it intends to is needed. For example, "...by requiring</p>

Organization	Yes or No	Question 1 Comment
		<p>applicable entities to have the data necessary to perform reliability analyses and real-time monitoring."</p> <p>While we agree with what we believe to be the intent of R9, using the word "continuous" without sufficient context remains ambiguous so as to prevent clear interpretation by all parties. We would suggest replacing the word "continuous" in R9 with "applicable". The timing criterion associated with an SOL should be associated with the timing criterion of the Facility Rating or Stability criteria. The revised requirement would read: Each Transmission Operator shall not operate outside any System Operating Limit (SOL) identified in Requirement R8 for the applicable duration that would cause a violation of the Facility Rating or Stability criteria upon which it is based.</p>
<p>Response: The SDT is a process user and does not determine the elements of the process. If the commenter has problems with the successive ballot concept, it should be directed to the NERC Standards Committee.</p> <p>The stated changes to the Purpose Statement have no relevance to TOP-001-2. No change made.</p> <p>The SDT does not see where any additional clarity has been added by the suggested change. No change made.</p>		
<p>Southwest Transmission Cooperative, Inc.</p>	<p>Affirmative</p>	<p>We generally agree with TOP-001 and the changes since the last posting. However, we continue to believe that use of the language “know or expected to be” in Requirement R3 is confusing and that this is a case where brevity is more effective in communicating the requirement. We believe striking this clause will improve the clarity of the requirement. As the clause is written now, it is not clear to whom it applies? We assume the SDT intended for the notification to be based on the expectation or knowledge of the TOP to whom the requirement applies. However, the clause is not clear on this but is rather a statement that appears to be some general knowledge or expectation. This opens the possibility of an auditor substituting their expectation or knowledge over the applicable TOP.</p> <p>Requirement R5 has a similar issue.</p>

Organization	Yes or No	Question 1 Comment
		<p>We are concerned that the examples listed in Requirement R5 may be too simplistic and could be interpreted too literally. A change in load is one example. Thus, a simple reading of the requirement would imply that a Transmission Operator that has a 1 MW change in a 10,000 MW would be required to notify the Reliability Coordinator. Clearly, that is not what is intended. To resolve this issue, two solutions could be applied. One solution would be to state that changes must be significant. A second solution would be to strike the examples altogether.</p> <p>Requirements R10 and R11 are inconsistent. Requirement R10 states the Transmission Operator must inform the RC of “its actions” to mitigate an IROL or SOL that has been exceeded while Requirement R11 compels the Transmission Operator “to act or direct others to act” to mitigate an IROL or SOL that has been exceeded. While we consider that a Transmission Operator directing others to act is the same as taking action itself, it would appear Requirement R11 does not consider directed actions as the actions of the Transmission Operator. This would imply that Requirement R10 does not include communication of the directed actions since it applies to Transmission Operator actions. However, we do not believe exclusion of Transmission Operator actions was intended in Requirement R10. The simplest solution to align these two requirements more closely would be to change “its” in Requirement R10 to “the”. In this way, Requirement R10 is not limited to only the actions taken directly by the Transmission Operator.</p> <p>The language in the Data Retention section regarding Requirements R7 and R9 needs to be made more consistent with the requirement. We are concerned that language could be interpreted as compelling the Transmission Operator to retain data for any IROL that is temporarily exceeded for a duration less than Tv or an SOL that is exceeded for a time that does not violate the criteria upon which it is based. Neither of these instances would represent a violation of either Requirement R7 or R9. Thus,</p>

Organization	Yes or No	Question 1 Comment
		<p>the data is not necessary to be retained.</p> <p>Under the Compliance Enforcement Authority section, we suggest “entities” in the first bullet and “functional entities” in the second bullet should be changed to “registered entities”. This will make them consistent with one another and the function model. The “Reliability Functional Model Technical Document” describes a functional entity not as a specific company but rather a specific part of the functional model such as a Balancing Authority. Registered entities are specific companies. For example, SPP is a registered entity that works for their Regional Entity as the Reliability Coordinator functional entity.</p>
<p>Response: R3 & R5: The SDT disagrees. By utilizing the results of the required Operational Planning Analysis, the Transmission Operator will know what other entities are known or expected to be affected. Striking the clause will not provide clarity but open up other questions. No change made.</p> <p>R5: The use of the term ‘significant’ would not provide any additional clarity as it is still an objective term open to interpretation. Merely striking the examples does not provide additional clarity either as it leaves the situation completely open to interpretation. The SDT believes that including the examples is the best way to go. Any auditor trying to use a 1 MW change on a 10,000 MW system will be hard-pressed to justify their actions. No change made.</p> <p>R10: The SDT disagrees. If the commenter accepts that directing others to act is the same as taking action itself, then the SDT asserts that Requirement R10 is perfectly in line with Requirement R11. No change made.</p> <p>Data retention: The SDT believes that by incorporating a reference to the requirements in question within the data retention language that the concern expressed by the commenter is not an issue. No change made.</p> <p>CEA: The SDT is using language here that has been utilized in multiple standards projects to date and was supplied by staff as accepted language. Furthermore, the SDT does not believe that the suggested changes will provided any additional clarity. No change made.</p>		
Progress Energy	Yes	: Progress Energy requests the removal of the word “identified” in association with Reliability Directive in all Requirements and Measures. Communications between Transmission Operators and other functional

Organization	Yes or No	Question 1 Comment
		<p>entities already require 3-part communications; having to state 'This is a Reliability Directive' to each entity and receive confirmation of that back from each entity, especially across a fleet of Generator Operators and LSEs, could add unnecessary time before action is taken. Entities should always assume that each directive being given to them is a Reliability Directive and respond accordingly. R1 would read "and Load-Serving Entity shall comply with each Reliability Directive issued by its Transmission Operator..."</p>
<p>Response: The SDT believes that it is imperative that each Reliability Directive be identified as such. The SDT refers the commenter to proposed COM-002-3 where it is clearly stated that each Reliability Directive must be identified as such. The SDT does not believe that such communication will delay a response. No change made.</p>		
Gulf Power Company	Affirmative	See comments submitted via the electronic comments form by Antonio Grayson.
Southern Company Services, Inc.	Affirmative	See comments submitted via the electronic comments form by Antonio Grayson.
Alabama Power Company	Affirmative	See comments submitted via the electronic comments form by Antonio Grayson.
Southern Company Generation	Affirmative	Please see comments submitted by Antonio Grayson on behalf of each part of Southern Company.
Mississippi Power	Affirmative	See comments submitted via the electronic comments form by Antonio Grayson.
Southern Company	Yes	<p>R3. The requirement is worded such that it implies that the Transmission Operator has a Transmission Operator. We suggest adding the word "other" so that it reads "shall inform its Reliability Coordinator and other Transmission Operator(s)...."</p>

Organization	Yes or No	Question 1 Comment
		R5. We recommend the following word changes:Each Transmission Operator shall inform its Reliability Coordinator and other Transmission Operators of its operations that are known or expected to result in an Adverse Reliability Impact on those their respective Transmission Operator Areas unless conditions do not permit such communications. Examples of such operations may include are relay or equipment failures, and changes in generation, Transmission, or Load.
Response: The SDT does not see any additional clarity with the suggested changes. No change made.		
Occidental Chemical	Affirmative	See Ingleside Cogeneration LP comment form
Ingleside Cogeneration LP	Yes	As a GO/GOP, Ingleside Cogeneration LP is subject only to TOP-001-2 R1 and R2, related to compliance with a Reliability Directive. We believe that the SDT has captured the appropriate circumstances for when a Reliability Directive is issued and identified - and the circumstances under which it may be not be possible to accommodate one. Furthermore, we agree with the language added to the corresponding Measures (M1 and M2) specifically allowing an attestation to be supplied to a CEA if a Reliability Directive was not received during the compliance time frame.
ComEd	Affirmative	Voted
Electric Reliability Council of Texas, Inc.	Affirmative	ERCOT supports the SDT's modifications.
Nebraska Public Power District	Affirmative	NPPD joins comments submitted by the Southwest Power Pool (SPP).
Southwest Power Pool Regional Entity	Yes	

Organization	Yes or No	Question 1 Comment
Imperial Irrigation District (IID)	Yes	
Dominion	Yes	
Luminant	Yes	
SPP Standards Review Group	Yes	
Arizona Public Service Company	Yes	
Independent Electricity System Operator	Yes	
City of Austin dba Austin Energy	Yes	
Liberty Electric Power LLC	Yes	
NV Energy	Yes	
American transmission Company	Yes	
FirstEnergy Corp	Yes	
Essential Power, LLC	Yes	
NextEra Energy, Inc.	Yes	
Cowlitz County PUD	Yes	
Response: Thank you for your support.		

2. The SDT made changes to TOP-002-3 in response to industry comments and the Quality Review. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made? If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

Summary Consideration: The majority of the comments received were requesting clarification or suggesting semantic changes. Clarifications have been provided but the semantic changes were not seen as providing any additional clarity to the standard.

Organization	Yes or No	Question 2 Comment
AEP Service Corp.; American Electric Power	Negative	Comments are being submitted via electronic form by Thad Ness on behalf of American Electric Power.
Bonneville Power Administration	Negative	Comments submitted separately.
Duke Energy	Negative	Comments submitted.
Duke Energy Carolina	Negative	Comments submitted
Florida Municipal Power Agency	Negative	Please see FMPA comments submitted separately.
Lakeland Electric	Negative	"Please see FMPA comments submitted separately"
Response: Thank you for submitting comments. Your comments are addressed below.		
MidAmerican Energy Co.	Negative	TOP-002 R2 uses the same vague language as TOP-001 R8. The wording "special subset of SOLs as defined by the TOP" needs to be added. Otherwise NERC and regional auditors will apply the wording broadly when the intent was for a specific subset of SOLs defined by the TOP. Also see the NSRF comments

Organization	Yes or No	Question 2 Comment
<p>Response: The wording of TOP-002-3, Requirement R2 is intentionally identical with that in TOP-001-2 to ensure consistency on terminology across the standards. The SDT does not believe these words are vague but believes they provide a specific reference for Transmission Operators to work with while allowing those Transmission Operators flexibility in operations. No change made.</p>		
<p>Seattle City Light</p>	<p>Negative</p>	<p>2. The SDT made changes to TOP-002-3 in response to industry comments and the Quality Review. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made? If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. 1 No Comments: R2, calls for TOP to have a plan to prevent exceeding SOLs of facilities identified in TOP-001-2 as “supporting reliability internal to its Transmission Operator Area.” This could cause TOPs to be in conflict with no remedy when there are competing transmission paths or facilities supporting internal reliability.</p> <p>R3 just requires TOP to notify all registered entities identified in R2, but again there is no requirement for those entities to comply with the plan. Is that all that is intended?</p> <p>This Standard could also be very difficult to comply with due to the data retention policy which requires maintaining six months worth of data for system analysis. The system studies requires huge amount of data and to maintain that amount of data for 6 months could be very expensive and complicated. Please reconsider cost vs. benefit of the data retention requirement.</p> <p>6. If you have any other comments on these standards that you have not already provided in response to the prior questions, please provide them here. Comments: Seattle City Light supports the efforts of the Real Time Operations Standards Drafting Team and approves of the direction proposed in these new TOP Standards. TOP-001 in particular clarifies the definition of Reliability Directive and provides straightforward requirements for reporting outages of relay and communication equipment. We are prepared to vote “affirmative” for all of the new TOP Standards</p>

Organization	Yes or No	Question 2 Comment
		of Project 2007-03 once details as discussed above are addressed and resolved.
<p>Response: R2: The SDT fails to see how the phrase in question will cause conflicts for the Transmission Operator. If there are competing solutions it is the obligation of the Transmission Operator to find the best solution for the reliability of the system. That is true today and it will not change in the future due to this phrasing. All this phrasing does is give the Transmission Operator another tool, namely elevating the status of certain SOLs, to come up with the best solution for reliability. No change made.</p> <p>R3: The SDT believes that Requirement R3 is informational in nature as it is in the planning horizon. Actual 'orders' to implement the plan will be issued at a later time by the Transmission Operator and are covered in other standards such as the proposed TOP-001-2. The SDT believes that the notification in this requirement will provide an opportunity for entities to comment on the plan and thus for the Transmission Operator to fine tune its plan. No change made.</p> <p>Data retention: In this day of cheap storage capability, the SDT does not believe that it will be an onerous burden to retain 6 months of analysis. This amount of storage is also consistent with guidelines provided by NERC staff. No change made.</p>		
Westar Energy	Negative	SDT has not adequately addressed previous comments.
<p>Response: The SDT points Westar to the responses posted for the previous posting. Without any further specific comments, the SDT has no further responses to offer.</p>		
Florida Municipal Power Pool	Affirmative	See FMPA comments
Florida Municipal Power Agency	No	The existing TOP-002-2 requires that both the BA and TOP perform current day, next day and seasonal plans. In the new TOP-002-3, the BA is eliminated from the applicability. Nowhere else in the standards is there a requirement for the BA to perform current-day, next-day and seasonal planning. The mapping document points to BAL-002 and the requirement for a BA to have enough Contingency Reserves (and confuses the references saying the R2 of BAL-002-1 requires a "plan", which it does not say). However, this is a real-time requirement of a BA and is not an operations planning analysis and is not a day-ahead plan. There ought to be a day-ahead plan to start enough generation to enable the load plus operating reserves to be met, which the existing TOP-02-2 standard essentially assigns to the BA. The mapping document

Organization	Yes or No	Question 2 Comment
		<p>also points to BAL-001, but, a 12-month rolling average of ACE has very little to do with day-ahead planning. And finally, the mapping document points to coordination needed in the Functional Model. The Functional Model is not mandatory and should not be depended upon in this manner. The mapping document says that the TOP develops the plan and passes it to the BA. This is not the case for unit commitment. For unit commitment, it is usually the other way around. TOPs develop constraints (e.g., SOLs) that the market participants use to transact; hence, the market participants (which involve the BAs) develop the transactions (which include unit commitment) often in parallel with the TOPs plans. TOPs do not plan or direct unit commitment except in cases where a unit needs to be "reliability must-run". FMPA is aware that there may be efforts to insert next-day planning into new BAL standards under development; however, it will be some time before those new standards are approved. IN the meantime, the new TOP standards should include operational planning analyses for the BA on an interim basis until those new BA standard(s) are approved and mandatory so that we do not create a gap in the interim.</p> <p>In addition, the standard has eliminated the current-day day and seasonal assessments and focuses only on next-day. FMPA believes that both current-day and seasonal remain important, to cover changes from yesterday's plan (e.g., unplanned outages that have occurred since yesterday's plan), and to coordinate planned outages seasonally.</p> <p>R1 - The SDT introduces a new term "Stability Limit" which seems duplicative of an SOL and adds a layer of ambiguity. What Stability Limits exist that would not be an SOL or IROL?</p> <p>Also, R1 and R2 become inconsistent with R1 referring to "Facility Ratings" and "Stability Limits" whereas R2 refers to "SOLs" and "IROLs". It would seem the two requirements should consistently use "SOLs" and "IROLs" consistently with FAC-014-2.</p>
City of Vero	No	The existing TOP-002-2 requires that both the BA and TOP perform current day, next

Organization	Yes or No	Question 2 Comment
		<p>day and seasonal plans. In the new TOP-002-3, the BA is eliminated from the applicability. Nowhere else in the standards is there a requirement for the BA to perform current-day, next-day and seasonal planning. The mapping document points to BAL-002 and the requirement for a BA to have enough Contingency Reserves (and confuses the references saying the R2 of BAL-002-1 requires a "plan", which it does not say). However, this is a real-time requirement of a BA and is not an operations planning analysis and is not a day-ahead plan. There ought to be a day-ahead plan to start enough generation to enable the load plus operating reserves to be met, which the existing TOP-02-2 standard essentially assigns to the BA. The mapping document also points to BAL-001, but, a 12-month rolling average of ACE has very little to do with day-ahead planning. And finally, the mapping document points to coordination needed in the Functional Model. The Functional Model is not mandatory and should not be depended upon in this manner. The mapping document says that the TOP develops the plan and passes it to the BA. This is not the case for unit commitment. For unit commitment, it is usually the other way around. TOPs develop constraints (e.g., SOLs) that the market participants use to transact; hence, the market participants (which involve the BAs) develop the transactions (which include unit commitment) often in parallel with the TOPs plans. TOPs do not plan or direct unit commitment except in cases where a unit needs to be "reliability must-run". FMPA is aware that there may be efforts to insert next-day planning into new BAL standards under development; however, it will be some time before those new standards are approved. IN the meantime, the new TOP standards should include operational planning analyses for the BA on an interim basis until those new BA standard(s) are approved and mandatory so that we do not create a gap in the interim.</p> <p>In addition, the standard has eliminated the current-day day and seasonal assessments and focuses only on next-day. FMPA believes that both current-day and seasonal remain important, to cover changes from yesterday's plan (e.g., unplanned outages that have occurred since yesterday's plan), and to coordinate planned outages seasonally.</p> <p>R1 - The SDT introduces a new term "Stability Limit" which seems duplicative of an</p>

Organization	Yes or No	Question 2 Comment
		<p>SOL and adds a layer of ambiguity. What Stability Limits exist that would not be an SOL or IROL?</p> <p>Also, R1 and R2 become inconsistent with R1 referring to "Facility Ratings" and "Stability Limits" whereas R2 refers to "SOLs" and "IROLs". It would seem the two requirements should consistently use "SOLs" and "IROLs" consistently with FAC-014-2.</p>
<p>Beaches Energy Services of theCity of Jacksonville Beach, Florida</p>	<p>No</p>	<p>The existing TOP-002-2 requires that both the BA and TOP perform current day, next day and seasonal plans. In the new TOP-002-3, the BA is eliminated from the applicability. Nowhere else in the standards is there a requirement for the BA to perform current-day, next-day and seasonal planning. The mapping document points to BAL-002 and the requirement for a BA to have enough Contingency Reserves (and confuses the references saying the R2 of BAL-002-1 requires a "plan", which it does not say). However, this is a real-time requirement of a BA and is not an operations planning analysis and is not a day-ahead plan. There ought to be a day-ahead plan to start enough generation to enable the load plus operating reserves to be met, which the existing TOP-02-2 standard essentially assigns to the BA. The mapping document also points to BAL-001, but, a 12-month rolling average of ACE has very little to do with day-ahead planning. And finally, the mapping document points to coordination needed in the Functional Model. The Functional Model is not mandatory and should not be depended upon in this manner. The mapping document says that the TOP develops the plan and passes it to the BA. This is not the case for unit commitment. For unit commitment, it is usually the other way around. TOPs develop constraints (e.g., SOLs) that the market participants use to transact; hence, the market participants (which involve the BAs) develop the transactions (which include unit commitment) often in parallel with the TOPs plans. TOPs do not plan or direct unit commitment except in cases where a unit needs to be "reliability must-run". We are aware that there may be efforts to insert next-day planning into new BAL standards under development; however, it will be some time before those new standards are approved. In the meantime, the new TOP standards should include operational</p>

Organization	Yes or No	Question 2 Comment
		<p>planning analyses for the BA on an interim basis until those new BA standard(s) are approved and mandatory so that we do not create a gap in the interim.</p> <p>In addition, the standard has eliminated the current-day day and seasonal assessments and focuses only on next-day. We believe that both current-day and seasonal remain important, to cover changes from yesterday's plan (e.g., unplanned outages that have occurred since yesterday's plan), and to coordinate planned outages seasonally.</p> <p>R1 - The SDT introduces a new term "Stability Limit" which seems duplicative of an SOL and adds a layer of ambiguity. What Stability Limits exist that would not be an SOL or IROL? Also, R1 and R2 become inconsistent with R1 referring to "Facility Ratings" and "Stability Limits" whereas R2 refers to "SOLs" and "IROLs". It would seem the two requirements should consistently use "SOLs" and "IROLs" consistently with FAC-014-2.</p>
<p>Response: The Balancing Authority has one role: To balance Load and resources. A key component of this role is to be able to recover from events that cause imbalance. The commenter intermingles the obligation of the Load-Serving Entity with that of the Balancing Authority. The SDT believes that in order for a Balancing Authority to comply with CPS and DCS and the requirements for emergency plans in EOP that they must plan and therefore a separate requirement is not needed and would actually represent double jeopardy. BAL-001-0.1a, BAL-002-1, EOP-001-0b, EOP-002-3, and EOP-003-1 cover these issues for the Balancing Authority.</p> <p>The standard has not eliminated other planning periods as Operational Planning Analysis covers all of the periods cited. What it does do is mandate a next-day analysis. Current day will be handled in Real-time operations and thus isn't needed in this planning environment. The SDT believes that longer term studies will be run by entities on an as needed basis but that requirements are only necessary for next-day. No change made.</p> <p>Stability Limit is a defined term in the NERC Glossary. IROLs and SOLs represent only part of what the Operational Planning Analysis (OPA) is to include. The OPA is to analyze all expected system conditions against all operating criteria. The SDT finds that is accomplished within a Transmission Operator Area by having an OPA that is assessed not to exceed any of its Facility Ratings or Stability Limits. While IROLs and SOLs represent many of these, they may not be granular enough to represent all of them. No change made.</p>		

Organization	Yes or No	Question 2 Comment
Bonneville Power Administration	No	<p>BPA appreciates the drafting team’s response to our previous comments and recommends additional clarification: Previous Comments: Given the potential uncertainty regarding how many day ahead studies may be required, BPA suggests adding more clarity to the standard TOP-002-3 to address. BPA recognizes that various regions experience peak operations at different times of the day, anticipated generation patterns shift over the course of the day; and transmission facilities of service start and stop times associated with planned maintenance and construction work at various times throughout the day. Hence, due to these multiple shifts in forecast system conditions, it is unclear whether more than one study is required to meet the requirements of this standard.</p> <p>Additional New Comments: Many entities tend to perform system studies more than one day ahead. Please specify the threshold at which a prior study would have to be updated to meet the next day study requirement. BPA suggests alternate language for the requirement ...something along the lines of ... An entity or TOP may perform a study more than one day in advance; they shall update the study if system conditions (such as line outages, etc.) changed such that there was more than a 5% change in the system operating limit, thereby requiring the need to rerun the study.</p>
<p>Response: There is no mandate in the standard regarding how many studies need to be performed. The requirement is for a valid analysis. If one study can get that done, then one study is sufficient. If conditions change, the SDT expects that the Transmission Operator will conduct another study to analyze the new conditions as the ‘old’ analysis would no longer be valid.</p> <p>The SDT believes that there is no single value applicable on a continent-wide basis that could be placed in a requirement and that the Transmission Operator is best suited to determine when a new analysis needs to be performed. No change made.</p>		
Consumers Energy	No	<p>This standard gives the TOP more direct authority than is in the MISO process today. The market has means to accommodate this operation. In R3, this may conflict with the present logic our TOP follows concerning their operation in the area of communicating conditions to Generation Operators and other Market Participants. We do not support this standard as written.</p>

Organization	Yes or No	Question 2 Comment
<p>Response: The commenter has failed to provide details on how Requirement R3 conflicts with policy so the SDT is unable to comment in that regard. However, the SDT wishes to point out that Requirement R3 does not require that the entire plan be sent to all entities – just that entity’s role in the plan. No change made.</p>		
<p>Southwest Transmission Cooperative, Inc.</p>	<p>Affirmative</p>	<p>We generally agree with the changes to the standard. However, we have identified the following concerns.</p> <p>TOP-001-2 R8 implies the Transmission Operator must look for SOLs that are not IROs in its Operational Planning Analysis that must be completed per TOP-002-3 R1. There is no such requirement in TOP-002-3 R1 or any other requirement that compels a Transmission Operator to look for these SOLs that are not IROs. Thus, the SDT needs to clarify if a Transmission Operator is required to look for these SOLs that are not IROs in the Operational Planning Analyses and why they are not referenced in TOP-003-2 R1. If the SDT did not intend for a Transmission Operator to be required to look for these SOLs that are not IROs, then it needs to refine TOP-001-2 R8 to be clear that the Transmission Operator may not have a need for these SOLs that are not IROs. TOP- 002-3 R2 further confuses the situation by referring to the SOLs that are not IROs that are identified in TOP-002-3 R1 rather than TOP-001-2 R8.</p> <p>Under the Compliance Enforcement Authority section, we suggest “entities” in the first bullet and “functional entities” in the second bullet should be changed to “registered entities”. This will make them consistent with one another and the function model. The “Reliability Functional Model Technical Document” describes a functional entity not as a specific company but rather a specific part of the functional model such as a Balancing Authority. Registered entities are specific companies. For example, SPP is a registered entity that works for their Regional Entity as the Reliability Coordinator functional entity.</p> <p>We disagree with the inclusion of voice recordings as an example of the type of evidence that might be retained for TOP-002-3. Operational Planning Analyses are typically conducted in a back office where communications would not be recorded. This might create the impression that there is now a requirement to record such</p>

Organization	Yes or No	Question 2 Comment
		<p>conversations. Recording of these conversations could mute much of the discussion that occurs among personnel performing these studies and working to resolve issues identified in them. Also, the three months retention period is not consistent with the change made to the retention period in TOP-001-2. It was changed to 90 days for voice recordings.</p>
<p>ACES Power Marketing</p>	<p>No</p>	<p>We generally agree with the changes to the standard. However, we have identified the following concerns.</p> <p>TOP-001-2 R8 implies the Transmission Operator must look for SOLs that are not IROLs in its Operational Planning Analysis that must be completed per TOP-002-3 R1. There is no such requirement in TOP-002-3 R1 or any other requirement that compels a Transmission Operator to look for these SOLs that are not IROLs. Thus, the SDT needs to clarify if a Transmission Operator is required to look for these SOLs that are not IROLs in the Operational Planning Analyses and why they are not referenced in TOP-003-2 R1. If the SDT did not intend for a Transmission Operator to be required to look for these SOLs that are not IROLs, then it needs to refine TOP-001-2 R8 to be clear that the Transmission Operator may not have a need for these SOLs that are not IROLs. TOP-002-3 R2 further confuses the situation by referring to the SOLs that are not IROLs that are identified in TOP-002-3 R1 rather than TOP-001-2 R8.</p> <p>Under the Compliance Enforcement Authority section, we suggest “entities” in the first bullet and “functional entities” in the second bullet should be changed to “registered entities”. This will make them consistent with one another and the function model. The “Reliability Functional Model Technical Document” describes a functional entity not as a specific company but rather a specific part of the functional model such as a Balancing Authority. Registered entities are specific companies. For example, SPP is a registered entity that works for their Regional Entity as the Reliability Coordinator functional entity.</p> <p>We disagree with the inclusion of voice recordings as an example of the type of evidence that might be retained for TOP-002-3. Operational Planning Analyses are typically conducted in a back office where communications would not be recorded.</p>

Organization	Yes or No	Question 2 Comment
		<p>This might create the impression that there is now a requirement to record such conversations. Recording of these conversations could mute much of the discussion that occurs among personnel performing these studies and working to resolve issues identified in them. Also, the three months retention period is not consistent with the change made to the retention period in TOP-001-2. It was changed to 90 days for voice recordings.</p>
<p>Brazos Electric Power Cooperative, Inc.</p>	<p>Negative</p>	<p>Additional clarification is necessary that warrants our negative vote. See the issues raised in the comments by ACES Power Marketing.</p>
<p>Response: The SDT expects the SOLs in question to come out of the analysis performed in Requirement R1 but does not believe that the requirement needs to explicitly tell the Transmission Operator that. It is part and parcel of the analysis function. No change made.</p> <p>CEA: The SDT is using language here that has been utilized in multiple standards projects to date and was supplied by NERC staff as accepted language. Furthermore, the SDT does not believe that the suggested changes will provided any additional clarity. No change made.</p> <p>Since this is a notification requirement, voice recordings are an appropriate type of evidence.</p>		
<p>AEP</p>	<p>No</p>	<p>In the previous comment period, AEP requested clarification on whether these requirements are in regards to pre-contingency monitoring or instead based on real-time flow. AEP assumed this was based on Real Time Flow, but we encouraged the drafting team to provide clarifying language to make it more clear to the reader. The drafting team responded by noting that “TOP-002-3 is about Operations Planning, thus it cannot be addressing actual Real-time flow” and “It addresses those flows contained in the Operational Planning Analysis (OPA) and the assessment thereof.” However, no such clarifying language was added to the standard. As stated in our response to Question #1, industry has provided comments to standard drafting teams in an effort to help avoid CANs, Interpretation Requests, and to increase the consistency of interpretation by both CEA’s and industry. And once again, while the team provided insight in their comments, the resulting lack of changes to the standard</p>

Organization	Yes or No	Question 2 Comment
		<p>still leave unnecessary ambiguity that could be easily addressed. Ambiguity of any kind deters from, rather than promotes, the reliability of the BES. Until such clarification is added to the standard itself, AEP cannot support the drafting team’s efforts in revising TOP-002-3.</p> <p>Rather than using terms such as “real-time flow”, we recommend using “projected post-contingency” and “projected pre-contingency”.</p>
<p>Response: The SDT believes that the definition of IROL speaks for itself and therefore that no further explanation is required within the standard. No change made.</p> <p>The SDT sees no additional clarity from the suggested change. No change made.</p>		
Duke Energy	No	<p>o R2 - Consistent with our comment above on TOP-001-2 Requirement R8, the phrase “supporting its internal area reliability” should be further clarified in some way.</p> <p>Also, change the phrase “as supporting” to “in support of”.</p>
<p>Response: The SDT believes that the Transmission Operator is uniquely qualified to determine such SOLs and that no further clarification is necessary. No change made.</p> <p>The SDT sees no additional clarity being provided by the suggested wording changes. No change made.</p>		
Oncor Electric Delivery	No	<p>Oncor agrees that the Operational Analysis Plan should be properly communicated, but that it should not be the role of the Transmission Operator to determine who is or who is not NERC Registered.</p>
<p>Response: NERC registered entities can easily be looked up and the SDT does not believe this is an onerous burden. This requirement as worded currently relieves the Transmission Operator of the obligation to notify entities that are not registered with NERC. No change made.</p>		
Southern Company	No	<p>R3- Southern understands the intent of this requirement is to notify all registered</p>

Organization	Yes or No	Question 2 Comment
		<p>entities that may be affected by a mitigation plan for the next day so they can be prepared to respond. However, in some cases like the one shown in the example below, it is unreasonable to expect the TOP to notify every GOP that could be re-dispatched. Requiring this would actually put the system at risk as the TOP would be focused on notifying GOPs inside its TOP area and potentially outside its TOP area and not focused on operating the system. Southern suggests that the requirement be changed to state that the TOP will notify "other TOP's and associated RC(s) associated with actions in the plan(s)" in a similar manner that other TOPs and RCs are notified in the proposed TOP-001-2, R3 and R5. If that is unacceptable to the SDT then it is suggested at a minimum that "all NERC registered entities" be clarified with the addition of the word "explicitly" just prior to "identified in the plan(s)". Example: An SOL is identified in the Operational Analysis for the next day from R2. The plan to mitigate this SOL is to call an IDC-TLR. The level of the TLR may or may not reach level 5. If the TLR reaches level 5 many generators will be required to be re-dispatched inside and outside of the TOPs area. This requirement will require the Transmission Operator to notify every Generator Operator that could possibly be re-dispatched for a TLR-5. Another concern with having the TOP notify all entities (which would include those outside their area) is the added FERC Standards of Conduct risk that the NERC standard is forcing the TOP to assume. For example, notification may go to a GOP which also performs market functions about which the TOP is unaware. In communicating the plan to the GOP, the TOP may inadvertently communicate non-public transmission information in violation of the Standards of Conduct. If communication is limited to external entities that are TOP and RC, this risk is eliminated and the communication to the GOP will take place by its native TOP - which should be familiar with any Standards of Conduct restrictions on communication to the GOP.</p>
<p>Response: The SDT believes that all entities that have a role in the plan need to be notified or the eventual implementation of the plan could be compromised. The requirement only stipulates that an entity receive notice of their role in the plan so there should be no fear of inadvertently providing sensitive information to an entity that shouldn't have such information. No change made.</p>		

Organization	Yes or No	Question 2 Comment
ReliabilityFirst Corporation	Abstain	ReliabilityFirst abstains and offers the same comments as submitted via the previous comment posting period.
<p>Response: The SDT points RFC to the responses posted for the previous posting. Without any further specific comments, the SDT has no further responses to offer.</p>		
Alabama Power Company	Affirmative	See comments submitted via the electronic comments form by Antonio Grayson.
American Transmission Company, LLC	Affirmative	Comments submitted.
Florida Power Corporation	Affirmative	comments submitted
FirstEnergy Energy; FirstEnergy Solutions	Affirmative	FE appreciates the hard work of the standards drafting team. Please see additional comments and suggestions submitted through the formal comment period.
Gulf Power Company	Affirmative	See comments submitted via the electronic comments form by Antonio Grayson.
Manitoba Hydro	Affirmative	Please see comments submitted by Joe Petaski (Manitoba Hydro)
Mississippi Power	Affirmative	See comments submitted via the electronic comments form by Antonio Grayson.
Progress Energy; Progress Energy Carolinas	Affirmative	"comments submitted"
Southern Company Generation; Southern Company Services, Inc.	Affirmative	Please see comments submitted by Antonio Grayson on behalf of each part of Southern Company.
Ohio Edison Company	Affirmative	FE appreciates the hard work of the standards drafting team. Please see additional comments and suggestions submitted through the formal comment period.

Organization	Yes or No	Question 2 Comment
<p>Response: Thank you for submitting comments. Your comments are addressed below.</p>		
<p>City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power; Tacoma Public Utilities</p>	<p>Affirmative</p>	<p>The term “anticipated ... Contingency event conditions” in R1. is not a NERC defined term and could be interpreted as requiring analysis of all contingencies including extreme events. The requirement should clarify if it only applies to certain types such as category P1 or whether each TO can independently select which types of contingencies they anticipate. One suggested form or rewording the requirement could be: R1. Each Transmission Operator shall have an Operational Planning Analysis that represents projected System conditions that will allow it to assess whether the planned operations for the next day within its Transmission Operator Area will exceed any of its Facility Ratings or Stability Limits during anticipated normal conditions and TPL-001-2 category P1 Single contingencies.</p>
<p>Response: The SDT believes that more than just single Contingencies need to be studied in order to have a viable plan. Extreme events are a separate item in the planning standards and would not be included here. No change made.</p>		
<p>Sacramento Municipal Utility District</p>	<p>Affirmative</p>	<p>Per discussion held at the NERC Standards Committee meeting in April, NERC Staff indicated changes would be made to the reference of "bulk power system" to "Bulk Electric System" would be changed on certain pertinent standards. This appears to be such a case.</p>
<p>Response: Neither of those terms is used within this standard. No change made.</p>		
<p>City of Austin dba Austin Energy</p>	<p>Yes</p>	<p>TOP-002-3, R1TOP-002-3, R1 states “Each Transmission Operator shall have an Operational Planning Analysis ...” and the mapping document says that this requirement “is patterned after the approved IRO-008-1, Requirement R1 for the Reliability Coordinator.” As such, Austin Energy suggests that the language in TOP-002-3, R1 be changed from “... shall have an Operational Planning Analysis ...” to “... shall perform an Operational Planning Analysis” This language matches IRO-008-1, R1 and better aligns with Measure 1 for TOP-002-3.</p>

Organization	Yes or No	Question 2 Comment
<p>Response: The language in Requirement R1 is intentional to allow for the use of a previously completed Operational Planning Analysis if it is still viable. No change made.</p>		
<p>Dominion</p>	<p>Yes</p>	<p>TOP-002-3 M2 should be updated to reflect the changes made in R2 (as suggested below).M2. Each Transmission Operator shall have evidence that it has developed a plan to operate within each IROL and each SOL which, while not an IROL, has been identified by the Transmission Operator as supporting reliability internal to its Transmission Operator Area, identified as a result of the Operational Planning Analysis performed in Requirement R1 in accordance with Requirement R2. Such evidence could include but it is not limited to plans for precluding operating in excess of each IROL and each SOL which, while not an IROL, was identified as a result of the Operational Planning Analysis.</p> <p>VSLs R2 (page 5 redline version) Severe Column should be updated to reflect the changes made in R2 (as suggested below).The Transmission Operator did not develop a plan to operate within those IROLs and each SOL which, while not an IROL, has been identified by the Transmission Operator as supporting reliability internal to its Transmission Operator Area, identified as a result of the Operational Planning Analysis performed in Requirement R1.</p>
<p>Response: The SDT sees no additional clarity being provided with the suggested change. No change made.</p>		
<p>Manitoba Hydro</p>	<p>Yes</p>	<p>Section 1.3 Data Retention - For consistency with TOP-001-2, the retention period for voice recordings in TOP-002-3 should be changed from 3 months to ‘ninety calendar days’.</p>
<p>Response: Your suggested change has been made.</p>		
<p>Progress Energy</p>	<p>Yes</p>	<p>Please change the R2 VSL from “supporting its internal area reliability” to “supporting reliability internal to its Transmission Operator Area...”.</p>

Organization	Yes or No	Question 2 Comment
<p>Response: The SDT sees no additional clarity being provided with the suggested change. No change made.</p>		
Idaho Power Company	Yes	I agree with the direction of the project. Consolidating all the TOP standards and eliminating the redundancy will make it much easier.
Cowlitz County PUD	Yes	This Standard is not applicable to Cowlitz PUD and the District will abstain in the ballot. However, this commenter sees no problems with the changes.
Nebraska Public Power District	Affirmative	NPPD joins comments submitted by the Southwest Power Pool (SPP).
ComEd	Affirmative	Voted
Consolidated Edison Co. of New York	Affirmative	See NPCC group comments
Electric Reliability Council of Texas, Inc.	Affirmative	ERCOT supports the SDT's modifications.
American transmission Company	Yes	
Arizona Public Service Company	Yes	
FirstEnergy Corp	Yes	
Imperial Irrigation District (IID)	Yes	
Independent Electricity System Operator	Yes	

Organization	Yes or No	Question 2 Comment
Occidental Chemical	Affirmative	See Ingleside Cogeneration LP comment form
Ingleside Cogeneration LP	Yes	
ISO New England Inc	Yes	
Kansas City Power & Light	Yes	
Liberty Electric Power LLC	Yes	
Luminant	Yes	
Lincoln Electric System	Negative	Please refer to comments submitted by the MRO NSRF for LES' concerns.
Great River Energy	Affirmative	Great River Energy agrees with the comments of the MRO NSRF
MRO NSRF	Yes	
New York Independent System Operator	Yes	
NextEra Energy, Inc.	Yes	
NV Energy	Yes	
Southwest Power Pool Regional Entity	Yes	
SPP Standards Review Group	Yes	
Texas Reliability Entity	Yes	

Organization	Yes or No	Question 2 Comment
Xcel Energy	Yes	
Response: Thank you for your support.		

3. The SDT made changes to TOP-003-2 in response to industry comments and the Quality Review. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made? If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

Summary Consideration: The comments received requested clarification or suggested semantic changes. The SDT has provided clarifications where requested. The semantic changes were not seen as providing any additional clarity to the requirements and have not been accepted. One change was made to Requirement R2, Part 2.1 to improve consistency between the requirement and the part in response to industry comments.

Part 2.1. A list of data and information needed by the Balancing Authority to support its analysis functions and Real-time monitoring.

Organization	Yes or No	Question 3 Comment
AEP Service Corp.; American Electric Power	Negative	Comments are being submitted via electronic form by Thad Ness on behalf of American Electric Power.
Cowlitz County PUD	Negative	Comment submitted.
Florida Municipal Power Agency	Negative	Please see FMPA comments submitted separately.
Kansas City Power & Light Co.	Negative	Comments and concerns with the proposed standards have been expressed within the NERC comment form
Lakeland Electric	Negative	"Please see FMPA comments submitted separately"
Omaha Public Power District	Negative	OPPD supports MRO and SPP RTO comments. Please see comments from Doug Peterchuck.
Response: Thank you for submitting comments. Your comments are addressed below.		
City of Garland	Negative	The requirements should be written such that they will support VSL levels of Lower,

Organization	Yes or No	Question 3 Comment
		Moderate, and High - not Severe only for R5. It should take minimal requirement sentence structuring to allow for all VSL levels to be assigned
<p>Response: The SDT believes that the severity of not fulfilling an entity’s obligations for this requirement warrant a single severe VSL. No change made.</p>		
East Kentucky Power Coop.	Negative	<p>The standard as proposed does not appear to comply with the stated intent of Project 2007-03, that being: “The industry needs clearer, unambiguous and enforceable standards in order to effectively operate the Bulk Electric System.” Not only are the changes to TOP-003 as vague—or ambiguous—if not more so than the previous TOP-003-1 standard, the requirements do not provide for any consistency between companies. For example, who between two parties determines, or in the case of an inability to reach agreement, who is responsible for arbitrating an agreement when two neighboring entities are attempting to establish a “mutually agreeable format”.</p> <p>Resolution could be problematic when required changes to a format between entities A and B would require format changes between entities A and C, A and D, and A and E, and would potentially require entity A to maintain several different format standards to meet the requirements for coordination between entities B, C, D, and E.</p> <p>Many items previously in TOP-003-1 appear to have been completely abandoned in lieu of much less prescriptive specifications in TOP-003-2. For example, clear provisions regarding timing of data availability listed in TOP-003-1 are not specified in any form in TOP-003-2 other than to require that entities needing to share data essentially “work it out amongst themselves”.</p> <p>The standard needs to better guide entities in regard to the type of data—at a minimum—they SHOULD be requesting and obtaining.</p> <p>Alternately, such format specifications should be left to the authority of the RC to coordinate among TO/BA entities for which they are responsible.</p>

Organization	Yes or No	Question 3 Comment
<p>Response: The SDT asserts that existing arbitration procedures can, and will be, used to resolve conflicts. No change made.</p> <p>Format agreements between A and B will not affect formats between A and C and vice versa. It is true that a Transmission Operator or Balancing Authority may need to support multiple formats but that is no different than it is today. No change made.</p> <p>The SDT believes that the requirements are sufficiently prescriptive without inhibiting needed flexibility in devising solutions. Mutual agreement amongst affected entities is a better solution in the long run than trying to force a one-size-fits-all approach to the problem. No change made.</p> <p>The concept of the data specification is that the Transmission Operator and Balancing Authority are in the best position to determine what data they need to perform their duties. This is in alignment with the approved IRO standards for the Reliability Coordinator. No change made.</p> <p>The Reliability Coordinator will be the final arbitrator on disputes but the SDT believes that it would be detrimental to the work of the Reliability Coordinator for them to be involved in each and every agreement if it isn't necessary. No change made.</p>		
INTELLIBIND	Negative	The Requirements are confusing and refer to other requirements. The original concept was that requirements shall stand alone, and not be dependent on other requirements or standards. Violation of R1 or R2 will cascade to additional violations based on the structure of the Standard. These issues should be repaired as a part of this revision.
<p>Response: The requirements do stand alone and are not dependent on other requirements. There are simple references to other requirements in Requirement R5 but no dependence. Each requirement stands alone and the VSLs follow suit so there are no cascading violations. No change made.</p>		
Seattle City Light	Negative	While the idea of making each BA and TOP formally outline a data specification for all the information it needs to perform its Operational Planning Analysis is a worthy concept, the requirements in this Standard for evidence and data retention are onerous. Specifically the requirement to retain all electronic or hard copies of data transmittals or retain attestations from all receiving entities would require a tremendous amount of resources to be compliant. It may also be technically impossible to comply with these requirements because the data specifications developed individually by each entity may not be compatible with each other. The

Organization	Yes or No	Question 3 Comment
		<p>formats and periodicity of data collected by each entity may not be compatible with the specifications and it could be impossible to comply with these requests without major changes to the infrastructure. As an alternative, most of the NERC registered entities are currently required to provide that data to their Reliability Coordinators (RC) using the specifications already developed by the RCs and that data could be used by the TOPs and BAs to perform their functions. Seattle City Light supports the efforts of the Real Time Operations Standards Drafting Team and approves of the direction proposed in these new TOP Standards. We are prepared to vote “affirmative” once details as discussed above are addressed and resolved.</p>
<p>Response: The SDT believes that it is counter-productive to involve the Reliability Coordinator in data transfers that are simply pass-through transfers and also believes that not all of the data required by a Transmission Operator or Balancing Authority will be available from the Reliability Coordinator in every instance. There is nothing in the standard that requires the retention of every data transmittal. Once an entity has provided evidence that they are supplying the data, the measure has been fulfilled. This should not be an onerous task. No change made.</p>		
Westar Energy	Negative	SDT has not adequately addressed previous comments.
<p>Response: The SDT points Westar to the responses posted for the previous posting. Without any further specific comments, the SDT has no further responses to offer.</p>		
AEP	No	<p>In the previous comment period, AEP suggested that R5 be modified so that it does not unintentionally create an edict to provide “any data” to parties simply because R5 could be interpreted as allowing requests of any kind. The SDT responded by stating that “Requirement R5 is bound by the constraints of Requirements R1 and R2 so that not just any information can be requested.” AEP does not see any explicit constraints specified in R1 or R2, and even if constraints were noted there, see nothing that would indicate those constraints would also apply to R5. At the most, the only possible constraint could be the “mutually agreeable format”, however that would seem to provide no bounds or constraints on the kind or amount of data being requested. We suggest providing further clarification that what has been mutually</p>

Organization	Yes or No	Question 3 Comment
		<p>agreed to by the parties involved, goes beyond simply the format of the data. In addition, it needs to be made clear that those constraints also apply to R5. Until such clarification is added to the standard itself, AEP cannot support the drafting team’s efforts in revising TOP-003-2.</p>
<p>Response: Requirement R1 clearly limits the data to that needed to support Operational Planning Analysis and Real-time monitoring. The SDT believes that this sufficiently limits the type and amount of data that can be requested. Requirement R5 is tied to the data specifications delivered in Requirements R3 and R4 so the limitations carry through. No change made.</p>		
Florida Municipal Power Pool	Affirmative	See FMPPA comments
Beaches Energy Services of the City of Jacksonville Beach, Florida	No	<p>Related to the BA performing a day-ahead plan discussed in FMPPA’s response to question 2, TOP-003-2 R2 only requires a BA to develop data specifications for reporting in real-time (i.e., bullet 2.1). There should be requirements for day-ahead as well.</p> <p>There are a number of data requirements that are proposed to be deleted and replaced with an ambiguous reference to a "specification for the data necessary", or a data specification, without any minimal requirements for what should be in that data specification. This approach will likely not go over well with the regulators. The SDT should be able to define a minimal list of data required, e.g, "such data specification will at minimum include: next-day load forecasts, next-day planned outages, generator capacity changes, protection system failures, special protection system status, real-time monitoring of generation and transmission, transmission Facility status, etc., etc." (note that these are all examples of specific requirements within the existing standards that the SDT is proposing to delete), possibly as an attachment to the standard.</p>
City of Vero	No	<p>Related to the BA performing a day-ahead plan discussed in FMPPA’s response to question 2, TOP-003-2 R2 only requires a BA to develop data specifications for reporting in real-time (i.e., bullet 2.1). There should be requirements for day-ahead</p>

Organization	Yes or No	Question 3 Comment
		<p>as well.</p> <p>There are a number of data requirements that are proposed to be deleted and replaced with an ambiguous reference to a "specification for the data necessary", or a data specification, without any minimal requirements for what should be in that data specification. This approach will likely not go over well with the regulators. The SDT should be able to define a minimal list of data required, e.g, "such data specification will at minimum include: next-day load forecasts, next-day planned outages, generator capacity changes, protection system failures, special protection system status, real-time monitoring of generation and transmission, transmission Facility status, etc., etc." (note that these are all examples of specific requirements within the existing standards that the SDT is proposing to delete), possibly as an attachment to the standard.</p>
<p>Florida Municipal Power Agency</p>	<p>No</p>	<p>Related to the BA performing a day-ahead plan discussed in FMPA’s response to question 2, TOP-003-2 R2 only requires a BA to develop data specifications for reporting in real-time (i.e., bullet 2.1). There should be requirements for day-ahead as well.</p> <p>There are a number of data requirements that are proposed to be deleted and replaced with an ambiguous reference to a "specification for the data necessary", or a data specification, without any minimal requirements for what should be in that data specification. This approach will likely not go over well with the regulators. The SDT should be able to define a minimal list of data required, e.g, "such data specification will at minimum include: next-day load forecasts, next-day planned outages, generator capacity changes, protection system failures, special protection system status, real-time monitoring of generation and transmission, transmission Facility status, etc., etc." (note that these are all examples of specific requirements within the existing standards that the SDT is proposing to delete), possibly as an attachment to the standard.</p>
<p>Response: The Balancing Authority has one role: To balance Load and resources. A key component of this role is to be able to recover</p>		

Organization	Yes or No	Question 3 Comment
<p>from events that cause imbalance. The commenter intermingles the obligation of the Load-Serving Entity with that of the Balancing Authority. The SDT believes that in order for a Balancing Authority to comply with CPS and DCS and the requirements for emergency plans in EOP that they must plan and therefore a separate requirement is not needed and would actually represent double jeopardy. BAL-001-0.1a, BAL-002-1, EOP-001-0b, EOP-002-3, and EOP-003-1 cover these issues for the BA.</p> <p>The data specification concept has already been approved by FERC for Reliability Coordinators in the IRO standards. No change made.</p>		
Consumers Energy	No	The standard as written is more vague than the current TOP-003. It follows the logic of IRO-010 and talks about specification documents instead of actions that need to be taken. We do not support this standard as written.
<p>Response: The data specification concept has already been approved by FERC for Reliability Coordinators in the IRO standards. No change made.</p>		
Cowlitz County PUD	No	<p>After reviewing the industry comments submitted, Cowlitz is respectfully perplexed why comments were not addressed related to lack of recourse the receiving entity of a data specification has if the data specification is unreasonable. The data specification receiving entity must have some recourse to appeal unreasonable obligation requirements short of appealing a violation finding through the RE/NERC/FERC or ultimately a court of law. Due to the undefined nature of what constitutes a reasonable data specification document other than a “mutually agreeable format,” the risk of capricious dictatorial demands having no reliability return is high. The usage of “format” can only encompass the organization, plan, and style of the data to be submitted; this can’t be used to limit data submittal to that which is available at a rate of transmittal which is possible. Cowlitz can’t find a remedy for requirement R5 without allowing for some risk of entity intransigent behavior leading to RE or ERO intervention. However, there are current standards that allow, but limit, this risk by defining allowable exceptions. Examples which include such exceptions to requirements are “unless such actions would violate safety...,” contained in several standards; and “unless it provides a reliability reason</p>

Organization	Yes or No	Question 3 Comment
		to the requestor...," contained in Standard IRO-006-5. Cowlitz suggests the following exemptions: Unless data or information is not available without installation of additional equipment, or can't be reasonably available due to existing equipment limitations, available personnel limitations, or unexpected equipment failure.
<p>Response: The SDT asserts that there are existing arbitration processes that entities can employ short of going to NERC, FERC, or courts. No change made.</p>		
Idaho Power Company	No	TOP-003 will require that we create a list of data necessary to complete our operational planning analysis. Currently I don't think we have a good process for doing analysis so defining the data required may be difficult.
<p>Response: Compliance with this requirement will be mandatory, resulting in the need for the list mentioned by the commenter.</p>		
Liberty Electric Power LLC	No	Multiple entities commented in the prior round that the standard would expose RE's to violation space in the event of a communications failure. Although the SDT stated in the consideration of comments that "It is not the intent of the SDT that TOP-003-2 penalizes entities for communication errors. The intent is to have the data communications established.", the plain language of the standard is in conflict with this position. The standard as written states a RE "shall satisfy the obligations of the documented specifications for data." Among the specifications of real time data requests are the periodicity of the submission. For example, PJM in Manual 14D, Generator Operational Requirements, states "All data items, regardless of type, are collected and disseminated at the same 2-second rate. Instantaneous MW and MVAR information is collected on the same data scan as Integrated MWh and MVARh." If a RE has a loss of their RTU, they will have failed to "satisfy the obligations of the documented specifications for data", and be exposed to a potential violation. If the intent of the SDT is as stated in the previous consideration of comments, there must be some language to that effect added to the standard. In R1, adding a bullet 1.21 "an alternative format for use in the event of interruption of the mutually agreed format" would close the hole in the language as written and

Organization	Yes or No	Question 3 Comment
		satisfy the stated objections.
<p>Response: Loss of an RTU or other communication problems are covered in the COM standards. This requirement is solely for the set up required to fulfill an entity’s data obligations. No change made.</p>		
Luminant Energy; Luminant Generation Company LLC	Negative	See comments submitted by Luminant.
Luminant	No	<p>TOP-003-2 as currently written does not provide any recourse for the entity receiving a data request if that entity feels the data request is unreasonable either in content or timing or if the entity does not have the data available to submit. As such I would recommend modify R5 as follows:R5. Each.....shall satisfy the obligations of the documented specification for data. R5.1. If the entity receiving the data request cannot provide the requested data either in content or timing then the entity receiving the data request shall notify the requesting entity and provide a reason for not providing the data.</p>
<p>Response: The SDT asserts that there are existing arbitration processes that entities can employ short of going to NERC, FERC, or courts. No change made.</p>		
Great River Energy	Affirmative	Great River Energy agrees with the comments of the MRO NSRF
American transmission Company	No	<p>Requirement R3 and R4 should specify which entities are required to respond to data requests. For example, a TOP in Indiana who sends a request to a TOP in Wisconsin; should the TOP in Wisconsin be required to respond. ATC recommends that the term “contiguous entity” be referenced and added to the requirements.+</p>
MidAmerican Energy	No	See the NSRF comments
Lincoln Electric System	Negative	Please refer to comments submitted by the MRO NSRF for LES' concerns.

Organization	Yes or No	Question 3 Comment
Muscatine Power & Water	Negative	Please see comments submitted by the MRO NSRF
MRO NSRF	No	Requirement R3, and R4 must specify which entities are required to respond to data requests. For example should a TOP in Indiana send a request to a TOP in Wisconsin, must it be complied with. Suggest a, “contiguous entity” reference. Requirements R1 and R3 are very vague and need to add more specificity similar to that from existing standard TOP-005 which includes specific guidelines.
<p>Response: The SDT believes that data requirements may go beyond contiguous entities and that any entity receiving a data specification is obligated to respond. No change made.</p>		
City Utilities of Springfield, Missouri	Negative	City Utilities of Springfield, MO supports the comments from SPP.
Southwest Power Pool Regional Entity	No	SPP RE does not believe TOP-003-2 addresses the requirements in PRC-001.
<p>Response: Without specific comments, the SDT is unable to respond as the SDT believes the requirements are met.</p>		
Texas Reliability Entity	No	<p>1) Overall, this change to TOP-003-2 will cause differences in what each TOP/BA thinks it needs in terms of data, which will be difficult to audit. There should be a minimum set of data that the TOP/BA should address (especially when removing more specific Requirements such as those that are deleted from PRC-001-1.) For example, if a TOP or BA decides not to monitor its SPSs, which is currently required by PRC-001-1, there will be no repercussions from a compliance standpoint, but an impact to monitoring the state of reliability will occur.</p> <p>2) R1: We suggest adding “analysis functions” after Operational Planning Analysis to fully capture performance requirements for a TOP during Real-Time.</p> <p>3) R2: We suggest adding “Operational Planning Analyses” in front of “analysis functions”. The Operational Planning Analysis, by definition, includes “Expected</p>

Organization	Yes or No	Question 3 Comment
		<p>system conditions such as load forecast(s), generation output levels . . .,” which relate to the Real Power balance requirement that the BA must comply with. A BA should also create a documented specification for the data necessary for it to perform an Operational Planning Analysis, which may include development of integrated operational plans, acquiring reliability-related services from Generator Operators, providing generation dispatch to the Reliability Coordinator, and other responsibilities as dictated by the Functional Model.</p> <p>4) R3 We suggest adding “analysis functions” after Operational Planning Analysis to fully capture performance requirements for a TOP during Real-Time.</p> <p>5) R4: We suggest “Operational Planning Analyses” in front of “analysis functions” to be consistent with our comment that R2 should require “Operational Planning Analysis” data in the BA’s data specification.</p> <p>6) R3 and R4: What is the required time frame required for the TOP and BA to distribute changes to its data specification? We suggest adding a sentence that the TOP or BA must distribute its data specification within 30 calendar days of creation or revision.</p> <p>7) R5: What is the required time frame for an Entity to satisfy the obligations of the data specification? None is specified. We suggest a time frame of 30 calendar days from the date of receipt to comply with changes to data specifications.</p> <p>8) The VRF and VSL justification document was inconsistent and unconvincing in several respects related to TOP-003-2 R2. That should be revisited after the requirements are firmed up.</p>
<p>Response: 1. The SDT believes that each Transmission Operator and Balancing Authority will have different requirements for data. That is one of the reasons for the data specification concept. Any omissions in the data specification will be filtered out by the inability of the Transmission Operator or Balancing Authority to fulfill their obligations and should therefore be quickly rectified. Any penalties associated with such omission would thus be picked up in the other standards associated with those duties. No change made.</p>		

Organization	Yes or No	Question 3 Comment
<p>2. The SDT sees no additional clarity being provided with the suggested change. No change made.</p> <p>3. Requirement R1 previously included both the Transmission Operator and Balancing Authority. However, multiple comments in previous postings pointed out that Balancing Authorities do not perform Operational Planning Analyses and thus the requirement was split as it is now shown. No change made.</p> <p>4. The SDT sees no additional clarity being provided with the suggested change. No change made.</p> <p>5. Balancing Authorities do not perform Operational Planning Analyses. No change made.</p> <p>6. The SDT sees no additional clarity being provided with the suggested change. The timeframe is essentially determined in Requirements R1, Part 1.4 and R2, Part 2.4. No change made.</p> <p>7. Requirements R1, Part 1.4 and R2, Part 2.4 identify the timeframe involved. No change made.</p> <p>8. Without specific comments, the SDT is unable to respond.</p>		
ReliabilityFirst Corporation	Abstain	ReliabilityFirst abstains and offers the same comments as submitted via the previous comment posting period.
<p>Response: The SDT points RFC to the responses posted for the previous posting. Without any further specific comments, the SDT has no further responses to offer.</p>		
PNGC Group Comments		<p>Comments: In addition to the same Applicability argument we made in Question 1 for TOP-001-2, the PNGC comment group has a couple of minor issues with TOP-003-2:1. We question the Violation Risk Factor (VRF) of “Medium” for R5. R1-4 have VRFs of “Low” so the “Medium” designation for R5 seems unwarranted. If the SDT views the failure of TOPs and BAs to distribute data requests to other entities in an agreeable format as a “Low” risk, then the failure of those other entities to respond to issued data requests should also be a “Low” risk. We believe R1-5 should all have a “Low” VRF.</p> <p>2. R1 and R2 require the BA and TOP create a documented specification for data needed to perform analysis functions and Real-time monitoring. We question R1.2 and R2.2: “A mutually agreeable format.” There absolutely should be a mutually</p>

Organization	Yes or No	Question 3 Comment
		<p>agreeable format for the data but the standard doesn't define how that is to be accomplished. It seems to us that the TOP and BA will just issue the directive without consultation and that violation of R1.2 and R2.2 by the TOP or BA is unenforceable. We suggest expanding M1 and M2 to include acknowledgement by entities that are the subject of requests. The acknowledgment should include that the request was received and the data format is agreed to.</p>
<p>Response: Requirements R1 through R4 all represent actions that are taking place 'ahead' of time. Therefore, there is some flexibility regarding them. Requirement R5 is the actual supply of data and there is no slack involved. No change made.</p>		
<p>Kansas City Power & Light</p>		<p>There is no reliability purpose served by an Entity developing and posting specifications of data needed to perform its Operational Planning Analysis and Real-time monitoring. The only reliability action that matters is the request for data specific to other Entities in order to perform analysis and monitor operating conditions. These requirements would be more effective if they targeted the following principles:1. Identify the data needed to perform analysis and effectively monitor operating conditions,2. Identify the Entities that may have data useful to support analysis and monitoring operating conditions and, 3. Seek to obtain the data from other Entities by engaging the other Entities and coming to a mutual agreement regarding data exchange with the Entity.</p> <p>Requirement R5 does not allow for "mutual agreement" as the SDT has suggested in their response to comments from the last draft. As written, this requirement will cause an Entity that is a recipient of a request for data to fail the requirement if a mutual agreement cannot be made.</p> <p>The SDT further states in their response to comments that requirements R1 and R2 ensure disparity between Entities cannot occur. On the contrary, the specifications that are developed as required by these requirements lock an Entity into that specification. If another Entity cannot meet any part of the specification in a data exchange request, there is no recourse in these requirements to relax the specification. The SDT has good intentions, however, these requirements as written</p>

Organization	Yes or No	Question 3 Comment
		do not allow for the flexibility needed in the exchange of data with other parties.
<p>Response: The SDT disagrees. There is a definite reliability benefit to creating the data specifications as they are required in order for the Transmission Operator and Balancing Authority to obtain the data they need to fulfill their responsibilities. The recipient of the data specification must receive clear data requirements or it may fail to provide data necessary to support the reliability reason that instigated the issuance of the data specification.</p> <p>Requirement R5 does not include mutual agreement because that concept is covered in Requirements R1 and R2.</p> <p>The SDT asserts that there are existing arbitration processes that entities that provide adequate recourse if issues can't be resolved. No change made.</p>		
Alabama Power Company	Affirmative	See comments submitted via the electronic comments form by Antonio Grayson.
American Transmission Company, LLC	Affirmative	Comments submitted.
Duke Energy Carolina	Affirmative	comments submitted
FirstEnergy Energy Delivery; FirstEnergy Solutions	Affirmative	FE appreciates the hard work of the standards drafting team. Please see additional comments and suggestions submitted through the formal comment period.
Gulf Power Company	Affirmative	See comments submitted via the electronic comments form by Antonio Grayson.
Manitoba Hydro	Affirmative	Please see comments submitted by Joe Petaski (Manitoba Hydro)
Mississippi Power	Affirmative	See comments submitted via the electronic comments form by Antonio Grayson.
New York Independent System Operator	Affirmative	Comments have been provided
Ohio Edison Company	Affirmative	FE appreciates the hard work of the standards drafting team. Please see additional

Organization	Yes or No	Question 3 Comment
		comments and suggestions submitted through the formal comment period.
Southern Company Generation	Affirmative	Please see comments submitted by Antonio Grayson on behalf of each part of Southern Company.
Southern Company Services, Inc.	Affirmative	See comments submitted via the electronic comments form by Antonio Grayson.
Response: Thank you for following the instructions on submitting comments. Your comments are addressed below.		
City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	Affirmative	If a Transmission Operator or a Balancing Authority is requesting data from another entity, they must demonstrate a reliability impact validating the need for the requested data.
Response: By limiting data to that specified in Requirements R1 and R2, the SDT believes that only reliability related data will be requested. No change made.		
Nebraska Public Power District	Affirmative	NPPD joins comments submitted by the Southwest Power Pool (SPP).
Southwest Power Pool, Inc.	Affirmative	<p>We continue to disagree with the successive ballot process that forces entities to decide on a voting position concurrent with the submittal of comments on the same. NERC needs to explore other ways to expedite the voting/comment process without forcing industry to have faith that changes will be made after approval. Although SPP votes in favor of this standard, we have outstanding comments that should be addressed. We have submitted them in the standards process and reiterate some of them here.</p> <p>The Purpose Statement is too general and does not provide any direction of how the proposed standard will meet its stated intent. As written the Purpose Statement is applicable to any NERC standard that exists or can be imagined. We suggest additional wording of how this particular standard intends to do what it intends to is</p>

Organization	Yes or No	Question 3 Comment
		<p>needed. For example, "...through requiring all operating parties who need to take action have the knowledge and obligation to do so."</p> <p>Deleting the requirements from PRC-001 and including them in R1 and R2 of TOP-003-2 raises the question of what other types of data or information need to be included in the specification that do not normally come to mind when considering this type of information. To be sure that all the bases are covered, we would suggest that the SDT provide a guideline which incorporates the types of data and information they envisioned when drafting these requirements. Additionally, incorporating protective relay information in the data specifications of R1 and R2 raises the potential for auditors to question the contents of an entity's specification. Again, guidance is needed on the part of the TOP and BA in developing the specification initially. Could the SDT provide this initial guidance, or list of examples, in the form of a guideline?</p> <p>We have concerns with R1 and R2 being as open-ended as they are, especially since they are followed by the obligation to provide that data contained in R5. For example, how do you resolve issues when a mutual agreement cannot be reached? If an entity feels that the requestor is asking for data that goes beyond what they would reasonably need to perform their analysis, what process is used to resolve the stand-off?</p>
<p>Response: The SDT is a process user and does not determine the elements of the process. If the commenter has problems with the successive ballot concept, it should be directed to the NERC Standards Committee.</p> <p>The SDT believes that the Purpose Statement is direct and to the point and clearly identifies what is required. No change made.</p> <p>The SDT re-iterates its position that the Transmission Operator and Balancing Authority are the best ones to determine the contents of the data specification and that any attempt to provide a minimal list or other guidance would be short-sighted and possibly misleading. The SDT believes that an auditor can only question what is contained in the requirements and in this case that would include only the existence of the data specification and not its contents. Any omissions of data will be caught up in failures to adhere to other standards. No change made.</p> <p>The SDT asserts that there are existing arbitration processes that entities can employ short of going to NERC, FERC, or courts. No</p>		

Organization	Yes or No	Question 3 Comment
change made.		
Tacoma Public Utilities	Affirmative	If a Transmission Operator or a Balancing Authority is requesting data from another entity, they must demonstrate a reliability impact validating the need for the requested data.
Response: By limiting data to that specified in Requirements R1 and R2, the SDT believes that only reliability related data will be requested.		
Brazos Electric Power Cooperative, Inc.	Negative	Additional clarification is necessary that warrants our negative vote. See the issues raised in the comments by ACES Power Marketing.
Southwest Transmission Cooperative, Inc.	Affirmative	<p>Generally, we agree with the standard. However, we have one concern regarding the Data Retention section. The third bullet compels the Transmission Operator to retain evidence for three calendar years that it distributed its data specification. Because the data needs do not change frequently, it is possible that the Transmission Operator will have periods greater than three years in which the data specification was not updated and, thus, not communicated. What data and information would the Transmission Operator use to demonstrate compliance in this situation? Would an attestation be appropriate? If so, the measure should be updated to reflect this.</p> <p>All of the responses to comments regarding concerns of Requirement R5 indicate that the SDT intended for Requirement R5 to apply to the general satisfaction of the data specification and not any specific data points. However, the Data Retention section does not support this view point. It requires retention of 90 days worth of data. Normally, short periods of data are retained when they are expected to be voluminous. Thus, we assume the Data Retention section was anticipating that the actual data supplied would be retained. This seems inconsistent with the concept of generally satisfying the data specification. It would make more sense to have a statement from the Transmission Operator indicating the data specification has been satisfied or documentation of the enabling of data links to demonstrate general</p>

Organization	Yes or No	Question 3 Comment
		<p>satisfaction of the data requirements.</p> <p>Under the Compliance Enforcement Authority section, we suggest “entities” in the first bullet and “functional entities” in the second bullet should be changed to “registered entities”. This will make them consistent with one another and the function model. The “Reliability Functional Model Technical Document” describes a functional entity not as a specific company but rather a specific part of the functional model such as a Balancing Authority. Registered entities are specific companies. For example, SPP is a registered entity that works for their Regional Entity as the Reliability Coordinator functional entity.</p>
ACES Power Marketing	Yes	<p>Generally, we agree with the standard. However, we have one concern regarding the Data Retention section. The third bullet compels the Transmission Operator to retain evidence for three calendar years that it distributed its data specification. Because the data needs do not change frequently, it is possible that the Transmission Operator will have periods greater than three years in which the data specification was not updated and, thus, not communicated. What data and information would the Transmission Operator use to demonstrate compliance in this situation? Would an attestation be appropriate? If so, the measure should be updated to reflect this.</p> <p>All of the responses to comments regarding concerns of Requirement R5 indicate that the SDT intended for Requirement R5 to apply to the general satisfaction of the data specification and not any specific data points. However, the Data Retention section does not support this view point. It requires retention of 90 days worth of data. Normally, short periods of data are retained when they are expected to be voluminous. Thus, we assume the Data Retention section was anticipating that the actual data supplied would be retained. This seems inconsistent with the concept of generally satisfying the data specification. It would make more sense to have a statement from the Transmission Operator indicating the data specification has been satisfied or documentation of the enabling of data links to demonstrate general satisfaction of the data requirements.</p>

Organization	Yes or No	Question 3 Comment
		<p>Under the Compliance Enforcement Authority section, we suggest “entities” in the first bullet and “functional entities” in the second bullet should be changed to “registered entities”. This will make them consistent with one another and the function model. The “Reliability Functional Model Technical Document” describes a functional entity not as a specific company but rather a specific part of the functional model such as a Balancing Authority. Registered entities are specific companies. For example, SPP is a registered entity that works for their Regional Entity as the Reliability Coordinator functional entity.</p>
<p>Response: The SDT believes that data specifications will change within a 3 year period and thus the situation cited is not relevant. If by some chance the specification didn’t change, there are many ways to show that and the SDT doesn’t feel that this exception needs to be spelled out in the standard. No change made.</p> <p>Data retention for Requirement R5 does not require that all data be kept for 90 days. It states that an entity must show that they fulfilled the obligation of the requirement. One way to do that would be to keep the data but there are other ways to show it. No change made.</p> <p>The SDT sees no additional clarity being provided with the suggested change. No change made.</p>		
Manitoba Hydro	Yes	<p>R2.1 - For consistency with R2 and completeness, ‘analysis functions’ should be added to R2.1. Suggested wording: ‘A list of data and information needed by the Balancing Authority to support its analysis functions and Real-time monitoring’.</p>
<p>Response: The SDT agrees and has made conforming changes to Requirement R2, Part 2.1.</p> <p>Part 2.1. A list of data and information needed by the Balancing Authority to support its <u>analysis functions and</u> Real-time monitoring.</p>		
NextEra Energy, Inc.	Yes	<p>NextEra believes additional editing is needed to provide the step-by-step clarity the proposed Reliability Standard seeks to implement. To provide more clarity, NextEra suggests that in R3, R4 and R5 be rewritten as follows: “R3. Consistent with the requirements of R1, each Transmission Operator shall distribute its request for data</p>

Organization	Yes or No	Question 3 Comment
		<p>to each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-Serving Entity, Transmission Owner, and Distribution Provider that has data required to be used in the Transmission Operator’s Operational Planning Analysis and Real-time monitoring process. ““R.4 Consistent with the requirements of R2, each Balancing Authority shall distribute its data request to each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-Serving Entity, Transmission Owner, and Distribution Provider that has data required to be used in the Balancing Authority’s analysis functions and Real-time monitoring process.””R5. Each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-Serving Entity, Transmission Owner, and Distribution Provider that receives a data request pursuant to Requirement R3 or R4 shall provide the requested data.”</p>
<p>Response: The SDT sees no additional clarity being provided with the suggested change. No change made.</p>		
NV Energy	Yes	<p>We see no problem with what was changed in this posting; however, please note issues raised related to TOP-003-2 in the comment submitted on Question 6.</p>
<p>Response: Please see response to Q6.</p>		
Occidental Chemical	Affirmative	<p>See Ingleside Cogeneration LP comment form</p>
Ingleside Cogeneration LP	Yes	<p>We are encouraged that the SDT has added a statement in M3 and M4 calling for those TOPs and BAs who post their data specifications to also electronically notify the downstream data suppliers. This is a good first step in the use of a web-based data collection process - which we hope will replace the spreadsheet-based process mostly in place today. A goal of such a system must be to consolidate all operational data requirements into a single template, so that data suppliers are not subject to redundant criteria.</p>

Organization	Yes or No	Question 3 Comment
Bonneville Power Administration	Yes	BPA is in support of this standard due to the importance of being able to receive data.
Consolidated Edison Co. of New York	Affirmative	See NPCC group comments
Electric Reliability Council of Texas, Inc.	Affirmative	ERCOT supports the SDT's modifications.
ComEd	Affirmative	Voted
Arizona Public Service Company	Yes	
City of Austin dba Austin Energy	Yes	
Dominion	Yes	
Duke Energy	Yes	
Essential Power, LLC	Yes	
FirstEnergy Corp	Yes	
Imperial Irrigation District (IID)	Yes	
Independent Electricity System Operator	Yes	
ISO New England Inc	Yes	

Organization	Yes or No	Question 3 Comment
New York Independent System Operator	Yes	
Oncor Electric Delivery	Yes	
Progress Energy	Yes	
Southern Company	Yes	
SPP Standards Review Group	Yes	
Xcel Energy	Yes	
Response: Thank you for your support.		

4. The SDT is suggesting the retirement of three requirements in PRC-001 since those requirements deal with data handling and can now be incorporated in the data specification concept suggested for TOP-003-2. Do you agree with the changes the drafting team has made? If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

Summary Consideration: The comments received were mainly requesting clarification or suggesting semantic changes. Clarification has been provided where necessary. The semantic changes were not seen as providing additional clarity and have not been incorporated.

One change to the standard was made due to industry comments. Section 1.2 of the Compliance Section was deleted as duplicative of Section 1.4.

Organization	Yes or No	Question 4 Comment
AEP		While AEP supports, in general, the removal of redundant requirements across standards, we do not yet agree with the proposed changes to TOP-003-2 (for the reasons provided in our response to Question #3). As such, AEP will reserve comment on any future changes that might be made to PRC-001 until further progress is made on TOP-003-2.
Response: Please see response to Q3.		
American transmission Company		ATC agrees with removing R6 from PRC-001, however ATC does not believe it is appropriately addressed in TOP-003-2. If the intent is to have SPS data as a part of a data specification, it should be stated in the requirements of TOP-003-2.
MRO NSRF		The NSRF agrees with removing R6 from PRC-001, however we do not feel it is appropriately addressed in TOP-003-2. If the intent is to have SPS data as a part of a data specification, it should be stated in the requirements of TOP-003-2.
Response: The intent of the data specification requirement concept is that the Transmission Operator and Balancing Authority will request all of the data that they need to fulfill their responsibilities. If that includes SPS data, then they will be expected to request it.		

Organization	Yes or No	Question 4 Comment
No change made.		
Florida Municipal Power Agency		Please see response to Question 6
City of Vero		Please see response to Question 6
Beaches Energy Services of the City of Jacksonville Beach, Florida		Please see response to Question 6
Response: Please see response to Q6.		
Manitoba Hydro		Section 1.4 Compliance Monitoring and Assessment Processes - Section 1.4 should be removed as it is identical to Section 1.2 'Compliance Monitoring and Reset Time Frame'.
Response: The SDT agrees that the sections are duplicative and has deleted Section 1.2.		
Southwest Power Pool Regional Entity		SPP RE does not believe TOP-003-2 addresses the requirements in PRC-001.
Response: The SDT disagrees. The data specification is required to contain all of the information that a Transmission Operator or Balancing Authority needs to fulfill its obligations. No change made.		
SPP Standards Review Group		No (The Yes/No boxes weren't on the screen. All I got was the comment box.)Deleting the requirements from PRC-001 and including them in R1 and R2 of TOP-003-2 raises the question of what other types of data or information need to be included in the specification that do not normally come to mind when considering this type of information. To be sure that all the bases are covered, we would suggest that the SDT provide a guideline which incorporates the types of data and information they envisioned when drafting these requirements. Additionally, incorporating protective

Organization	Yes or No	Question 4 Comment
		<p>relay information in the data specifications of R1 and R2 raises the potential for auditors to question the contents of an entity’s specification. Again, guidance is needed on the part of the TOP and BA in developing the specification initially. Could the SDT provide this initial guidance, or list of examples, in the form of a guideline?</p> <p>Also, measures for R1 and R3 are missing.</p>
<p>Response: The SDT re-iterates its position that the Transmission Operator and Balancing Authority are the best ones to determine the contents of the data specification and that any attempt to provide a minimal list or other guidance would be short-sighted and possibly misleading. The SDT believes that an auditor can only question what is contained in the requirements and in this case that would include only the existence of the data specification and not its contents. Any omissions of data will be caught up in failures to adhere to other standards. No change made.</p> <p>The scope of the changes that the SDT was allowed to make only involved the deletion of the requirements and did not represent a revision of the standard as a whole. That will be taken up in a later project. No change made.</p>		
NV Energy		<p>No, we believe there may be reliability gaps introduced with the specific deletion of old R2 from PRC-001. We are concerned that the open-ended specification of required data per proposed TOP-003 R1 may not adequately cover the notification of status and conditions for certain protection systems and SPS. With the requirement R2 in place, there is no doubt about the need to make notification of these sorts of losses or status changes. Absent the requirement, it is likely that inconsistent specifications for such information by TOP's or BA's will result.</p>
<p>Response: The SDT disagrees. The data specification is required to contain all of the information that a Transmission Operator or Balancing Authority needs to fulfill its obligations. No change made.</p>		
ACES Power Marketing		<p>No. While we are supportive of the changes, they do not appear to be coordinated with the Project 2007-06 System Protection Coordination that was started recently. It appears to retain the retired requirements.</p>
<p>Response: The version of PRC-001 that is posted on the web site is over two years old and does not represent the current work being done with that standard. The SDT has coordinated the changes to PRC-001 with the Project 2007-06 team and the next iteration</p>		

Organization	Yes or No	Question 4 Comment
shown by that project will not have the data requirements. No change made.		
Texas Reliability Entity		<p>No.1) Requirements R2, R5 and R6 of PRC-001-1, which are proposed to be deleted, are not actually replaced by any new or revised requirements in other standards, resulting in reliability gaps. The PRC-001-1 requirements relate to Same-day and Real-time Operations, whereas the TOP-003-2 requirements relate only to the Operations Planning time horizon. The real-time elements of the PRC-001-1 requirements are lost.</p> <p>2) R2- Removal of R2 assumes that the requirement intent will be included in TOP-003-2 R1 or R2 specification, but there is no new requirement to replace R2 of PRC-001.</p> <p>3) R2 - The requirements to “take corrective action as soon as possible” are extremely important to the reliability of the system and deleting them introduces a reliability gap. In the Issues Database document there is indication that R5 of TOP-001-2 satisfies the need for corrective action as soon as possible with the following phrase “Addressed in Requirement R5 in proposed TOP-001-2 where the Transmission Operator coordinates its operations.” However, the text of TOP-001-2 R5 does not actually support this approach and therefore leaves a reliability gap in the Standards.</p> <p>4) Texas RE disagrees with several of the PRC-001 issues listed as complete in the Issues Database. The referenced TOP Standards are extremely limited in scope and lacking in details (especially in light of ignoring Real-Time issues) and are not considered interchangeable with the deleted PRC-001 Requirements as suggested.</p> <p>5) R5- Removal of R5 assumes that the requirement intent will be included in TOP-003-2, but there is no new requirement to replace R5 of PRC-001.. R5 is related to the coordination of changes affecting protection systems of others. R5 should not be removed because it deals with coordination issues and not merely specification and provision of data.</p> <p>6) R6-We object to the proposed removal of R6 because this Real-time requirement is not picked up anywhere else, and elimination of the requirement to monitor and</p>

Organization	Yes or No	Question 4 Comment
		<p>communicate the status of Special Protection Systems will cause a reliability gap. 7) There are no Measures for Requirements R1 and R3.</p>
		<p>Response: 1. The SDT disagrees. TOP-003-2 sets up the transfer of Real-time information as shown in Requirements R1 and R2. No change made.</p> <p>2. The data specification is required to contain all of the information that a Transmission Operator or Balancing Authority needs to fulfill its obligations. No change made.</p> <p>3. Once the SDT provides notification as per TOP-001-2, Requirement R5, the SDT believes that they will be directed as to what to do. No change made.</p> <p>4. Without specific comments, the SDT is unable to respond. However, the SDT disagrees that the proposed standards ignore Real-time. No change made.</p> <p>5. The Transmission Operator already has the responsibility in its core set of duties to provide such coordination and the SDT believes that a separate requirement is not needed to reinforce this. No change made.</p> <p>6. The SDT disagrees. The data specification is required to contain all of the information that a Transmission Operator or Balancing Authority needs to fulfill its obligations. No change made.</p> <p>7. The scope of the changes that the SDT was allowed to make only involved the deletion of the requirements and did not represent a revision of the standard as a whole. That will be taken up in a later project. No change made.</p>
NextEra Energy, Inc.		Yes, we agree.
Liberty Electric Power LLC		Yes. Thank you to the SDT for removing these requirements.
Bonneville Power Administration		Yes, BPA is in support of the retirement of the three requirements in PRC-001 as the SDT is suggesting.
Essential Power, LLC		Yes, I support the recommendation.
Arizona Public Service		Yes, we agree with the changes the drafting team has made.

Organization	Yes or No	Question 4 Comment
Company		
Southern Company		Yes, we agree with the SDT's suggestion
City of Austin dba Austin Energy		We agree.
Imperial Irrigation District (IID)		Yes
Duke Energy		Yes
MidAmerican Energy		Yes - retire the three requirements in PRC-001
Cowlitz County PUD		Cowlitz supports the retirement.
FirstEnergy Corp		FE agrees with the changes that have been made by the drafting team.
Ingleside Cogeneration LP		Ingleside Cogeneration LP agrees that relay and equipment status can be included in a telemetry specification as part of TOP-003-2 - which is redundant with PRC-001-1 R2 and R6. Similarly, the coordination of changes in generation operating conditions such as de-ratings that could require changes in the TOP's Protection System (R5) can be captured in existing data submission vehicles that TOP-003-2 will also cover.
Oncor Electric Delivery		Agree with changes
Dominion		Agree with changes made.
Response: Thank you for your support.		

5. The VRF, VSL, and Time Horizons are part of a non-binding poll. Please indicate whether you agree or disagree with the VRF, VSL, and Time Horizon assignments. If you do not support these assignments or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

Summary Consideration: Several typos in the VRF/VSL justification document were pointed out by commenters and have been fixed. No other changes have been made to the VRFs or VSLs.

Organization	Yes or No	Question 5 Comment
PNGC Group Comments	No	Please see our response to Question 2.
Response: Please see response to Q2.		
AEP	No	In general, the VRFs and VSLs are too severe and punitive. Those stated for R1, R2, and R5 of TOP-001-2 are especially so, given what we see as open-endedness to what might be requested. As a result, AEP cannot support the proposed VRFs and VSLs.
Response: The SDT believes that the VRFs and VSLs follow accepted guidelines. Without any specific comments, the SDT is unable to provide specific responses. No change made.		
ACES Power Marketing	No	<p>The Moderate and High VSLs for TOP-001-2 R3, R5, R6, and R8 incorrectly use an “or” condition when “and” is necessary to establish the range of percentages of performance. As written now, any percentage from 0 to 100% qualifies for both VSLs.</p> <p>The following boiler plate language that is written before the VSLs for TOP-001-2 R8 needs to be included before all sets of VSLs that give an option to use integers or percentages. Otherwise, the VSLs will overlap. It should be included before TOP-001-2 R3, R5, and R6.</p> <p>“For the Requirement X VSL only, the intent of the SDT is to start with the Severe VSL first and then to work your way to the left until you find the situation that fits. In this</p>

Organization	Yes or No	Question 5 Comment
		<p>manner, the VSL will not be discriminatory by size of entity. If a small entity has just one affected reliability entity to inform, the intent is that that situation would be a Severe violation.”</p> <p>For the Severe VSL of TOP-002-3 R3, an extra space is needed before “15%”.</p>
<p>Response: The SDT agrees and has made conforming changes. The second ‘or’ condition in the Moderate and High VSLs is now “and”.</p> <p>The boilerplate language cited is merely an explanation of the SDT’s intent. The standard has been modified to show this language for Requirements R3, R5, R6, and R8 as suggested.</p> <p>The SDT agrees and has corrected the typo.</p>		
MidAmerican Energy	No	See the NSRF comments
MRO NSRF	No	<p>TOP-001-2 The adding the language of “or 5% or less of the affected Transmission Operators, whichever is less”, “or more than 5% or less than or equal to 10% of the affected Transmission Operators, whichever is less”, “or more then 10% or less than or equal to 15% of the affected Transmission Operators, whichever is less”, “ or more than 15% of the affected Transmission Operators, whichever is less” to R3, R5, and R6 is confusing and not necessary. For example: 10 affected TOs. The lower VSL states: The TO did not inform one other TO or 5% or less of the affected TOs, whichever is less. 5% of 10 is .5 TOs which is less than 1. The percentage language should be removed. TOP-003-2 - Same issue with VSLs as with TOP-001-2. The percentage language should be removed from R3 and R4. PRC-001-2 - R1 VSL for High and Severe seem arbitrary. Not knowing limitations are not as bad as not knowing purpose? Suggest either breakdown by number of systems. Ie: did not know purpose and limitations of 1 protection scheme, etc. Or Binary. Severe - did not know purpose and limitation of protections systems in its area.</p>
<p>Response: The percentage language was added at the direct behest of the Quality Review Team and utilizes standard language for</p>		

Organization	Yes or No	Question 5 Comment
this type of situation. No change made.		
Luminant	No	<p>The VSL for TOP-003-2 R5 places a more stringent severity level on the entities receiving the data requests than it places on the entities that are responsible for creating the data requests. As such, I would suggest changing the VSL for TOP-003-2 R5 to the following: Lower: The responsible entity receiving a data specification in Requirement R3 or R4 did not satisfy one of the obligations of the documented specification for data Moderate: The responsible entity receiving a data specification in Requirement R3 or R4 did not satisfy two of the obligations of the documented specification for data High: The responsible entity receiving a data specification in Requirement R3 or R4 did not satisfy three of the obligations of the documented specification for data Severe: The responsible entity receiving a data specification in Requirement R3 or R4 did not satisfy four or more of the obligations of the documented specifications for data.</p>
<p>Response: The SDT sees the previous requirements in TOP-003-2 as ahead of time requirements which mean that there is some slack that can be incorporated into the deliberations without jeopardizing reliability and VSLs reflect this fact. However, Requirement R5 is about the actual data transfer and there is no room for error, thus the more stringent VSL. No change made.</p>		
Kansas City Power & Light	No	In addition, the VSL for R5 in TOP-003 does not reflect partial efforts to exchange data by Entities.
<p>Response: Requirement R5 is about the actual data transfer and there is no room for error, thus the more stringent VSL. No change made.</p>		
Liberty Electric Power LLC	No	As written data transmission failures subject REs to a severe violation in R5, see Q3 response.
<p>Response: Please see response to Q3.</p>		
NV Energy	No	PRC-001 R1: Though this requirement does not appear to be within the scope of the

Organization	Yes or No	Question 5 Comment
		<p>SDT's efforts in this project, we note that for R1 (familiarity of purpose and limitations of protection systems), there is no Measure in the Standard, and the VSL's appear to be quite subjective. I would like to make a specific suggestion, but cannot do so without knowing what sort of Measures are intended for this requirement. Perhaps, change the VSL language to state "Entity does not possess documentation describing purpose/limitations of its protection systems for its Operator personnel."</p>
<p>Response: The scope of the changes that the SDT was allowed to make only involved the deletion of the requirements and did not represent a revision of the standard as a whole. That will be taken up in a later project. No change made.</p>		
Duke Energy	No	<ul style="list-style-type: none"> o TOP-001-2 VSLs should be revised consistent with our comments on the requirements. o TOP-003-2 VSLs have explanatory language on how the SDT intends the VSLs to be used. This language needs to be incorporated into the VSLs more directly, because compliance personnel will not be bound by the SDT's intent.
<p>Response: No changes were made to the requirements as explained in Q1. No change made.</p> <p>The SDT believes that the VSL language is correct and will not need to be changed to reflect the explanation which will be deleted from the final draft. It was provided here for ease of reference to commenters. No change made.</p>		
Texas Reliability Entity	No	<ol style="list-style-type: none"> 1) VSL for TOP-001-2 R3: Operational Planning Analysis, by definition, excludes Real-Time issues such as "actual Emergencies." We suggest improving the requirement as discussed above and then making conforming revisions to this VSL. 2) VSL for TOP-001-2 R5: "When conditions permit" is subjective and ambiguous therefore consistency in auditing will not occur. Are you sure that "whichever is less" is what you mean to say here? (also applies to VSLs for R3, R6 and R8) 3) TOP-001-2 R7: VRF justification statement is incomplete ("The requirements are viewed as similar since they both refer to <missing text>") 4) TOP-001-2 R8: In the VRF justification, the text in the second and third bullets

Organization	Yes or No	Question 5 Comment
		<p>appears to be garbled.</p> <p>5) TOP-001-2 R9: We recommend this requirement be assigned a “High” VRF. Uncorrected SOL violations could cause bulk power system instability, separation, and or cascading if exacerbated in Real-Time by other SOL violations, contingencies, faults, or misoperations (and may be dependent on the SOL Methodology timing in FAC-011 and not be captured in TOP-001-2 R7). Note that the VRF justification for R10 correctly refers to a High VRF for R9. Additionally, remove the word “local” in all places used in the R9 VRF justification.</p>
<p>Response: 1. No changes were made to the requirement as explained in Q1. Therefore, no changes are necessary to the VSL.</p> <p>2. The SDT reviewed the indicated wording and verified that it is what was meant. As conditions permit is well accepted terminology in a situation where a hard and fast value is not possible. No change made.</p> <p>3. The SDT agrees and has corrected the text.</p> <p>4. The SDT agrees and has corrected the text.</p> <p>5. SOLs, by definition, can’t cause instability, etc., and thus the VRF is correctly stated as Medium. The VRF justification document will be corrected accordingly. The SDT believes that the use of ‘local’ is appropriate.</p>		
Oncor Electric Delivery	No	<p>For TPL-001”Oncor respectfully takes the position that the proposed language in R6 will not provide a coordinated communication effort in the event of a planned outage of telemetry, control equipment and associated communication channels. The term “negatively impacted interconnected registered entities” is too broad and too subjective. Oncor believes that the Reliability Coordinator is in the best position to determine who is negatively impacted and that they should be the entity that makes further notification after receiving the initial planned outage request from the originating entity.”</p>
<p>Response: Please see response to Q1.</p>		
Cowlitz County PUD	No	<p>After reviewing the industry comments submitted, Cowlitz is respectfully perplexed</p>

Organization	Yes or No	Question 5 Comment
		<p>why comments were not addressed related to the VSL binary treatment of R5. A data specification document may be very complex, and the Standard does not define non-compliance other than obligations were not satisfied. One data variable missing (either accidental omission or inability to provide) can incur an immediate violation if the data specification document does not include any leniency in this regard. Further, the proposed VLS for R5 does not allow for any credit of the entity's effort in fulfilling the obligations set forth in a data specification document.</p>
<p>Response: The SDT disagrees. Requirement R5 is not about individual failures in communications. Please see response to Q3. No change made.</p>		
<p>Bonneville Power Administration</p>		<p>TOP-001-2 VRFs/VSLs - NO - BPA recommends a sliding scale based on duration and percentage of the SOL violation. Example: If an entity is high by 2% of the SOL for 1 minute, their VSL should be substantially lower than if they were 25% off for more than 30 minutes. Sliding scale should start at the bottom ... couple of MW for a minute ... as an example.</p> <p>TOP-002-3: VRFs/VSLs - NO - BPA recommends a sliding scale based on how far off the original study was from the after the fact analysis. Example: If an entity did not have a study, the penalty should be severe. If an entity did have a study, but it was only 5% off, the penalty should be less severe.</p> <p>TOP-003-2 VRFs/VSLs - YES - BPA is in support.</p>
<p>Response: The SDT understands the concept of a sliding scale that is being suggested but finds it impractical and potentially unwieldy to implement. In addition, it doesn't take into account the fact that 2% on one line in a particular location may be a more severe impact on the overall reliability of the system than 25% on another line. No change made.</p>		
<p>Western Eledtricity Coordinating Council</p>	<p>Yes</p>	<p>I support the language of the VSLs for the proposed standards. I also understand the logic behind the statement included above the VSLs for R8 of TOP-001 and R3 and R4 of TOP-003. However, I question whether or not it is appropriate for this type of language to appear in the VSLs. It seems that this should be handled by the Regional</p>

Organization	Yes or No	Question 5 Comment
		Enforcement departments.
<p>Response: That language will be removed in the final draft. No change made.</p>		
Independent Electricity System Operator	Yes	In the Violation Severity Levels section of the standards, items that contain “whichever is less” following the “or” statement, may be difficult to interpret. As a suggestion, this could be addressed by improving the wording, providing examples or categorizing non-compliance as a percentage only (rather than a number “or” percentage, whichever is less)
<p>Response: The percentage language was added at the direct behest of the Quality Review Team and utilizes standard language for this type of situation. No change made.</p>		
City of Austin dba Austin Energy	Yes	The VSL for TOP-001-2, R8 includes instruction to “start with the Severe VSL first and then to work your way to the left until you find the situation that fits.” It explains that the goal is to assign a Severe VSL to a small entity who has just one affected reliability entity to inform and fails to do so. This structure usually makes sense; however, it is not applicable to R8. R8 requires the TOP to inform its RC of SOLs that have been identified as supporting reliability. The variability in the requirement is in the number of SOLs identified not in the number of registered entities to inform. The intent of being non-discriminatory by size of entity is already covered with regards to the number of SOLs identified because the VSL uses the “# SOLs or % of SOLs, whichever is less” approach, and the instruction becomes unnecessary. Austin Energy recommends that the SDT remove the instruction statement above R8.
<p>Response: The statement will be removed in the final draft. No change made.</p>		
Imperial Irrigation District (IID)	Yes	
Dominion	Yes	

Organization	Yes or No	Question 5 Comment
SPP Standards Review Group	Yes	
Arizona Public Service Company	Yes	
Southern Company	Yes	
Idaho Power Company	Yes	
Ingleside Cogeneration LP	Yes	
Manitoba Hydro	Yes	
FirstEnergy Corp	Yes	
NextEra Energy, Inc.	Yes	
<p>Response: Thank you for your support.</p>		

6. If you have any other comments on these standards that you have not already provided in response to the prior questions, please provide them here.

Summary Consideration: The SDT identified one comment on the mapping document that was corrected due to comments received to this question.

Organization	Yes or No	Question 6 Comment
AEP Marketing, AEP Service Corp.	Negative	Comments are being submitted via electronic form by Thad Ness on behalf of American Electric Power.
American Electric Power	Negative	Comments are being submitted via electronic form by Thad Ness on behalf of American Electric Power.
Cowlitz County PUD	Negative	Comment submitted.
Duke Energy, Duke Energy Carolina	Negative	Comments submitted.
Florida Municipal Power Agency	Negative	Please see FMPA comments submitted separately.
Kansas City Power & Light Co.	Negative	Comments and concerns with the proposed standards have been expressed within the NERC comment form.
Lakeland Electric	Negative	"Please see FMPA comments submitted separately"
Luminant Energy	Negative	See comments submitted by Luminant.

Luminant Generation Company LLC	Negative	Comments submitted via NERC web comment form.
Omaha Public Power District	Negative	Please see OPPD comments from Doug Peterchuck
Progress Energy Carolinas	Negative	Comments submitted
Response: Thank you for submitting comments.		
City of Green Cove Springs	Negative	<p>The existing TOP-001-1 R7 essentially requires communication to the RC and neighboring TOPs any time a Facility is to be switched. The new TOP-001-2 R5 will only require such communication when such switching would result in an "Adverse Reliability Impact" defined as: "The impact of an event that results in frequency-related instability; unplanned tripping of load or generation; or uncontrolled separation or cascading outages that affects a widespread area of the Interconnection." This significantly reduces the requirements for communication / notification for switching Facilities. It is worthwhile to communicate switching of some Facilities whether or not they would result in an "Adverse Reliability Impact". Suggest rephrasing to something like any unplanned switching of Facilities not "noticed" through data provision of TOP-003-2. With the number of human error events that have occurred, we should not be reducing the communication / notification requirements.</p> <p>R8 is not needed since it is already covered in FAC-014-2 R5.2. As a result, R9, R10 and R11 ought to be modified to refer to FAC-014-2 rather than R8.</p>
<p>Response: R7: The SDT believes that notification for any switching event is contrary to good operating practice as it would load up the message queue with unnecessary information and could lead to an operator missing an important message within a group of unneeded messages. TOP-003-2 allows for an entity to request reliability-based information from another entity so they may include status on any piece of equipment that may possibly effect its operations. Therefore, the SDT does not believe that a reliability gap has been created. No change made.</p> <p>R8: The SDT asserts that there are subtle differences in TOP-001-2 and FAC-014-2 that the commenter is missing. FAC-014-2 provides a simple list of SOLs while TOP-001-2 is looking at particular SOLs that need special treatment. Therefore, there is no redundancy. No change made.</p>		

<p>City of Green Cove Springs</p>	<p>Negative</p>	<p>The existing TOP-002-2 requires that both the BA and TOP perform current day, next day and seasonal plans. In the new TOP-002-3, the BA is eliminated from the applicability. Nowhere else in the standards is there a requirement for the BA to perform current-day, next-day and seasonal planning. The mapping document points to BAL-002 and the requirement for a BA to have enough Contingency Reserves (and confuses the references saying the R2 of BAL-002-1 requires a "plan", which it does not say). However, this is a real-time requirement of a BA and is not an operations planning analysis and is not a day-ahead plan. There ought to be a day-ahead plan to start enough generation to enable the load plus operating reserves to be met, which the existing TOP-02-2 standard essentially assigns to the BA. The mapping document also points to BAL-001, but, a 12-month rolling average of ACE has very little to do with day-ahead planning. And finally, the mapping document points to coordination needed in the Functional Model. The Functional Model is not mandatory and should not be depended upon in this manner. The mapping document says that the TOP develops the plan and passes it to the BA. This is not the case for unit commitment. For unit commitment, it is usually the other way around. TOPs develop constraints (e.g., SOLs) that the market participants use to transact; hence, the market participants (which involve the BAs) develop the transactions (which include unit commitment) often in parallel with the TOPs plans. TOPs do not plan or direct unit commitment except in cases where a unit needs to be "reliability must-run". We are aware that there may be efforts to insert next-day planning into new BAL standards under development; however, it will be some time before those new standards are approved. IN the meantime, the new TOP standards should include operational planning analyses for the BA on an interim basis until those new BA standard(s) are approved and mandatory so that we do not create a gap in the interim.</p> <p>In addition, the standard has eliminated the current-day day and seasonal assessments and focuses only on next-day. we believes that both current-day and seasonal remain important, to cover changes from yesterday's plan (e.g., unplanned outages that have occurred since yesterday's plan), and to coordinate planned outages seasonally.</p>
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Response: The Balancing Authority has one role - to balance Load and resources. A key component of this role is to be able to recover from events that cause imbalance. The commenter intermingles the obligation of the Load-Serving Entity with that of the Balancing Authority. The SDT believes that in order for a Balancing Authority to comply with CPS and DCS and the requirements for emergency plans in EOP standards that they must plan and therefore a separate requirement is not needed and would actually represent double jeopardy. BAL-001-0.1a, BAL-002-1, EOP-001-0b, EOP-002-3, and EOP-003-1 cover these issues for the Balancing Authority.

The standard has not eliminated other planning periods as Operational Planning Analysis covers all of the periods cited. What it does do is mandate a next-day analysis. Current day will be handled in Real-time operations and thus isn't needed in this planning environment. The SDT believes that longer term studies will be run by entities on an as needed basis but that requirements are only necessary for next-day. No change made.

<p>City of Green Cove Springs</p>	<p>Negative</p>	<p>R1 - The SDT introduces a new term "Stability Limit" which seems duplicative of an SOL and adds a layer of ambiguity. What Stability Limits exist that would not be an SOL or IROL? Also, R1 and R2 become inconsistent with R1 referring to "Facility Ratings" and "Stability Limits" whereas R2 refers to "SOLs" and "IROLs". It would seem the two requirements should consistently use "SOLs" and "IROLs" consistently with FAC-014-2.</p> <p>Related to the BA performing a day-ahead plan discussed in FMPA's response to question 2, TOP-003-2 R2 only requires a BA to develop data specifications for reporting in real-time (i.e., bullet 2.1). There should be requirements for day-ahead as well.</p> <p>There are a number of data requirements that are proposed to be deleted and replaced with an ambiguous reference to a "specification for the data necessary", or a data specification, without any minimal requirements for what should be in that data specification. This approach will likely not go over well with the regulators. The SDT should be able to define a minimal list of data required, e.g, "such data specification will at minimum include: next-day load forecasts, next-day planned outages, generator capacity changes, protection system failures, special protection system status, real-time monitoring of generation and transmission, transmission Facility status, etc., etc." (note that these are all examples of specific requirements within the existing standards that the SDT is proposing to delete), possibly as an attachment to the standard.</p>
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Response: Stability Limit is a defined term in the NERC Glossary. IROLs and SOLs represent only part of what the Operational Planning Analysis (OPA) is to include. The OPA is to analyze all expected system conditions against all operating criteria. The SDT finds that is accomplished within a Transmission Operator Area by having an OPA that is assessed not to exceed any of its Facility Ratings or Stability Limits. While IROLs and SOLs represent many of these, they may not be granular enough to represent all of them. No change made.

The SDT agrees and has made conforming changes to Requirement R2, Part2.1.

Part 2.1. A list of data and information needed by the Balancing Authority to support its analysis functions and Real-time monitoring.

The data specification concept has already been approved by FERC for Reliability Coordinators in the IRO standards. No change made.

City of Green Cove Springs	Negative	<p>While we agrees with a results-based approach to standards, it seems to us that there have been a number of human-error based problems that justify agreed upon protocols and procedures being covered by the standards. Hence, TOP-004 R6, which requires development of formal policies and procedures among neighboring TOPs should not be eliminated from the standards.</p> <p>On the Mapping Document, TOP-004-2 R5, on the discussion that the requirement be deleted, the document says that the TOP does not have the authority to unilaterally separate without the approval of the RC. FMPA believes that they do if there is an imminent threat (e.g., the exceptions to IRO-001-2 of “unless such actions would violate safety, equipment, or regulatory or statutory requirements”). So, while FMPA agrees that the requirement can be deleted, the reason for the deletion does not seem accurate.</p>
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Response: TOP-004-2, Requirement R6 has been superseded by the NERC Reliability Standards taken as a whole. Examples of such would be the proposed TOP-001-2.

The SDT agrees and has updated the mapping document accordingly.

City of Garland	Negative	R5 VSL levels should have low, moderate, and high - not just severe
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Response: As explained in Q5, there is no room for error in Requirement R5 and thus it has been assigned a binary VSL. No change made.

Commonwealth of Massachusetts Department of Public Utilities	Negative	<ul style="list-style-type: none"> o There is use of the term “Reliability Directive” in the standard which is currently and formally under development as part of another project. The posting states that this definition was agreed to by all affected project teams using it, however if the other project team formally charged with this definition’s development, changes it, then this standard and perhaps others, will have to be revisited. Bringing these standards forward seems inefficient and problematic for many. o Also in Requirement 8 there was an issue expressed by one RSC member that System Operating Limits are local limits and should not be subject of part of the NERC standards and the requirement as written creates a “subset” of SOLs that affect reliability. This could create an overly complicated standard and could lead to compliance difficulties.
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Response: Please see response to identical comments in Q1.

Detroit Edison Company	Negative	<p>R3- The sentence should read “... inform its Reliability Coordinator and other Transmission Operator(s), ...” The word other is missing in the current draft.</p> <p>R6- The statement “... negatively impacted interconnected NERC registered entities...” is to vague. This could be an easy trip up during an audit.</p> <p>M6- same as R6- The statement “... negatively impacted interconnected NERC registered entities...” is to vague.</p> <p>VSLs- R6- The statement “... negatively impacted interconnected NERC registered entities...” is to vague.</p>
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Response: Please see response to identical comments in Q1.

<p>East Kentucky Power Coop.</p>	<p>Negative</p>	<p>The standard as proposed does not appear to comply with the stated intent of Project 2007-03, that being: “The industry needs clearer, unambiguous and enforceable standards in order to effectively operate the Bulk Electric System.” Not only are the changes to TOP-003 as vague-or ambiguous--if not more so than the previous TOP-003-1 standard, the requirements do not provide for any consistency between companies. For example, who between two parties determines, or in the case of an inability to reach agreement, who is responsible for arbitrating an agreement when two neighboring entities are attempting to establish a “mutually agreeable format”. Resolution could be problematic when required changes to a format between entities A and B would require format changes between entities A and C, A and D, and A and E, and would potentially require entity A to maintain several different format standards to meet the requirements for coordination between entities B, C, D, and E. Many items previously in TOP-003-1 appear to have been completely abandoned in lieu of much less prescriptive specifications in TOP-003-2. For example, clear provisions regarding timing of data availability listed in TOP-003-1 are not specified in any form in TOP-003-2 other than to require that entities needing to share data essentially “work it out amongst themselves”. The standard needs to better guide entities in regard to the type of data-at a minimum-they SHOULD be requesting and obtaining. Alternately, such format specifications should be left to the authority of the RC to coordinate among TO/BA entities for which they are responsible.</p>
<p>Response: Please see response to identical comment in Q3.</p>		
<p>INTELLIBIND</p>	<p>Negative</p>	<p>There should either be a description of what the specific vote is for, or a link to the information for each vote if you want to encourage affirmative voting.</p>
<p>Response: Your comment will be passed on to staff for consideration in future postings.</p>		
<p>National Association of Regulatory Utility Commissioners</p>	<p>Negative</p>	<p>Given the standard uses the term Reliability Directive as a defined term but is not proposing to define the term in this standard for adoption in the glossary, it is inappropriate to finalize this standard.</p>

<p>Response: Please see response to Q1.</p>		
Oncor Electric Delivery	Negative	Oncor believes that the Reliability Coordinator is in the best position to determine who the negatively impacted interconnected registered entities are and to effectively coordinate communication efforts after receiving the initial planned outage request from the originating entity. In addition, the term “negatively impacted interconnected registered entities” is too broad and too subjective. As a result, we recommend R6 be revised to: Each Balancing Authority and Transmission Operator shall notify its Reliability Coordinator and negatively impacted interconnected NERC registered entities of planned outages of telemetering equipment, control equipment and associated communication channels between the affected entities.
<p>Response: Please see response to identical comment in Q1.</p>		
ReliabilityFirst Corporation	Negative	ReliabilityFirst votes in the negative and offers the same comments as submitted via the previous comment posting period.
<p>Response: Without specific comments, the SDT is unable to respond other than to point to previous posting responses.</p>		
Santee Cooper	Negative	The implementation date should be at least twelve months to be consistent with TOP-001-2 and TOP-002-3. What was the rationale of reducing the implementation time from twenty-four months to ten months?
<p>Response: The implementation date was reduced due to multiple comments in the previous posting as commenters felt that the proposed standards reflected what was already being done and would not incorporate much change. The ten month implementation period was intended to allow time for dissemination of the data specification prior to the other changes taking effect (the standards with a 12 month implementation period.)</p>		

<p>Seattle City Light</p>	<p>Negative</p>	<p>While the idea of making each BA and TOP formally outline a data specification for all the information it needs to perform its Operational Planning Analysis is a worthy concept, the requirements in this Standard for evidence and data retention are onerous. Specifically the requirement to retain all electronic or hard copies of data transmittals or retain attestations from all receiving entities would require a tremendous amount of resources to be compliant. It may also be technically impossible to comply with these requirements because the data specifications developed individually by each entity may not be compatible with each other. The formats and periodicity of data collected by each entity may not be compatible with the specifications and it could be impossible to comply with these requests without major changes to the infrastructure. As an alternative, most of the NERC registered entities are currently required to provide that data to their Reliability Coordinators (RC) using the specifications already developed by the RCs and that data could be used by the TOPs and BAs to perform their functions. Seattle City Light supports the efforts of the Real Time Operations Standards Drafting Team and approves of the direction proposed in these new TOP Standards. We are prepared to vote “affirmative” once details as discussed above are addressed and resolved.</p>
<p>Response: Please see response to identical comment in Q3.</p>		
<p>Southwest Transmission Cooperative, Inc.</p>	<p>Negative</p>	<p>The Moderate and High VSLs for TOP- 001-2 R3, R5, R6, and R8 incorrectly use an “or” condition when “and” is necessary to establish the range of percentages of performance. As written now, any percentage from 0 to 100% qualifies for both VSLs “For the Requirement X VSL only, the intent of the SDT is to start with the Severe VSL first and then to work your way to the left until you find the situation that fits. In this manner, the VSL will not be discriminatory by size of entity. If a small entity has just one affected reliability entity to inform, the intent is that that situation would be a Severe violation.”</p> <p>For the Severe VSL of TOP-002-3 R3, an extra space is needed before “15%”.</p>
<p>Response: Please see response to identical comment in Q5.</p>		

Western Electricity Coordinating Council	Abstain	I agree with the language of the VSLs for TOP-003-2. I also understand the logic behind the statement included above the VSLs for R3 and R4. However, I question whether or not it is appropriate for this type of language to appear in the VSLs. It seems that this should be handled by the Regional Enforcement departments.
Response: The language will be removed from the final drafts. No change made.		
Mississippi Power	Affirmative	See comments submitted via the electronic comments form by Antonio Grayson.
Gulf Power Company	Affirmative	See comments submitted via the electronic comments form by Antonio Grayson.
Georgia Power Company	Affirmative	See comments submitted by Antonio Grayson.
Bonneville Power Administration	Affirmative	Please see BPA's submitted comments
Alabama Power Company	Affirmative	See comments submitted via the electronic comments form by Antonio Grayson.
Southern Company Generation	Affirmative	Please see comments submitted by Antonio Grayson on behalf of each part of Southern Company.
Response: Thank you for submitting comments.		
Nebraska Public Power District	Affirmative	NPPD joins comments submitted by the Southwest Power Pool (SPP).

Southwest Power Pool, Inc.	Affirmative	We continue to disagree with the successive ballot process that forces entities to decide on a voting position concurrent with the submittal of comments on the same. NERC needs to explore other ways to expedite the voting/comment process without forcing industry to have faith that changes will be made after approval. Although SPP votes in favor of this standard, we have outstanding comments that should be addressed. We have submitted them in the standards process and reiterate some of them here. The Purpose Statement is too general and does not provide any direction of how the proposed standard will meet its stated intent. As written the Purpose Statement is applicable to any NERC standard that exists or can be imagined. We suggest additional wording of how this particular standard intends to do what it intends to is needed. For example, "...by requiring applicable entities to have the data necessary to perform reliability analyses and real-time monitoring.'
<p>Response: Please see response to identical comment in previous questions.</p>		
City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	Affirmative	If a Transmission Operator or a Balancing Authority is requesting data from another entity, they must demonstrate a reliability impact validating the need for the requested data.
<p>Response: Please see response to identical comment in Q3.</p>		
City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	Affirmative	We would like to request that specific definitions are included for the individual time horizons. We suggest the following potential definitions: 1. Same Day Operations - Routine actions required within the time frame of a day, but not real-time. 2. Real-time Operations - Actions required within one hour or less to preserve the reliability of the bulk electric system. 3. Operations Assessment - Follow-up evaluations and reporting of real-time operations.
<p>Response: The latest set of approved Time Horizon classifications is posted on the Reliability Standards Resources Web Page.</p>		
Electric Reliability Council of Texas, Inc.	Affirmative	ERCOT supports the SDT's modifications.

Response: Thank you for your support.

END OF REPORT