

Consideration of Comments on Emergency Operations SAR — Project 2009-03

The Emergency Operations SAR Drafting Team thanks all commenters who submitted comments on the SAR. The SAR was posted for a 45-day public comment period from December 7, 2009 through January 15, 2010. Stakeholders were asked to provide feedback on the standards through a special electronic comment form. There were 20 sets of comments, including comments from more than 70 different people from over 35 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

For this report, the comments have been organized by question number so it is easier to see where there is consensus. The comments submitted can be reviewed in their original format on the following Web page:

http://www.nerc.com/filez/standards/Project2009-03_Emergency_Operations.html

Most commenters agreed that there is a reliability-related need for the proposed standard actions and agreed that the clarity of the standards needs improvement. Commenters also suggested that the DT include the NERC BOT approved versions of the standards, the DT agreed and modified the SAR. The majority of commenters agreed that the list of functional entities was accurate but some commenters questioned the inclusion of the DPs, TSPs, PSEs, and LSEs. The DT responded that “The identification of a functional entity in the SAR does not mean that it will be included as an applicable entity in the revised standards. Its inclusion (in the scope) of the SAR allows the SDT to investigate their potential role, if any, in the revised standards.” Numerous commenters made suggestions that pertained to the standards rather than the SAR and the DT will address those during the standard drafting phase of the project. Minor changes were made to the SAR in response to stakeholder comments.

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 and Director of Standards, Herb Schrayshuen, at 609-452-8060 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Standards Processes Manual:
http://www.nerc.com/filez/standards/Standards_Processes_Manual.html

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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

		Commenter	Organization	Industry 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, LLC		NPCC	10										
2.	Gregory Campoli	New York Independent System Operator		NPCC	2										
3.	Roger Champagne	Hydro-Quebec TransEnergie		NPCC	2										
4.	Kurtis Chong	Independent Electricity System Operator		NPCC	2										
5.	Sylvain Clermont	Hydro-Quebec TransEnergie		NPCC	1										
6.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.		NPCC	1										
7.	Brian D. Evans-Mongeon	Utility Services		NPCC	8										
8.	Mike Garton	Dominion Resources Services, Inc.		NPCC	5										
9.	Brian L. Gooder	Ontario Power Generation Incorporated		NPCC	5										
10.	Kathleen Goodman	ISO - New England		NPCC	2										
11.	David Kiguel	Hydro One Networks Inc.		NPCC	1										
12.	Michael R. Lombardi	Northeast Utilities		NPCC	1										
13.	Randy MacDonald	New Brunswick System Operator		NPCC	2										
14.	Greg Mason	Dynergy Generation		NPCC	5										

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	Commenter	Organization	Industry Segment												
			1	2	3	4	5	6	7	8	9	10			
15. Bruce Metruck	New York Power Authority	NPCC 6													
16. Chris Orzel	FPL Energy/NextEra Energy	NPCC 5													
17. Robert Pellegrini	The United Illuminating Company	NPCC 1													
18. Saurabh Saksena	National Grid	NPCC 1													
19. Michael Schiavone	National Grid	NPCC 1													
20. Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC 3													
21. Gerry Dunbar	Northeast Power Coordinating Council	NPCC NA													
22. Lee Pedowicz	Northeast Power Coordinating Council	NPCC NA													
2.	Group	Denise Koehn	Bonneville Power Administration	X		X		X	X						
Additional Member			Additional Organization	Region Segment Selection											
1.	Jim Burns	Transmission Technical Operations	WECC	1											
2.	Sally Long	Transmission Technical Operations	WECC	1											
3.	Group	Ben Li	IRC Standards Review Committee		X										
Additional Member			Additional Organization	Region Segment Selection											
1.	Bill Phillips	MISO	MRO	2											
2.	Al Dicaprio	PJM	RFC	2											
3.	Mark Thompson	AESO	WECC	2											
4.	Charles Yeung	SPP	SPP	2											
5.	Steve Myers	ERCOT	ERCOT	2											
6.	Matt Goldberg	ISO-NE	NPCC	2											
7.	Lourdes Estrada-Saliner	CAISO	WECC	2											
8.	Jim Castle	NYISO	NPCC	2											
4.	Group	Sam Ciccone	FirstEnergy	X		X	X	X	X						
Additional Member			Additional Organization	Region Segment Selection											
1.	Dave Folk	FirstEnergy	RFC	1, 3, 4, 5, 6											
2.	Doug Hohlbaugh	FirstEnergy	RFC	1, 3, 4, 5, 6											
3.	Steve Megay	FirstEnergy	RFC	1											

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	Commenter	Organization	Industry Segment																	
			1	2	3	4	5	6	7	8	9	10								
4.	John Reed	FirstEnergy	RFC	1																
5.	Group	Jalal Babik	Electric Market Policy		X		X		X	X										
Additional Member Additional Organization Region Segment Selection																				
1.	Louis Slade		RFC	5																
2.	Mike Garton		NPCC	6																
6.	Group	Jason L. Marshall	Midwest ISO Standards Collaborators			X														
Additional Member Additional Organization Region Segment Selection																				
1.	Barb Kedrowski	We Energies	RFC	3, 4, 5																
2.	Kirit Shah	Ameren	SERC	1																
3.	Jim Cyrulewski	JDRJC Associates, LLC	RFC	8																
4.	Joe Knight	Great River Energy	MRO	1, 3, 5, 6																
7.	Group	Carol Gerou	NERC Standards Review Subcommittee																	X
Additional Member Additional Organization Region Segment Selection																				
1.	Chuck Lawrence	American Transmission Company	MRO	1																
2.	Tom Webb	WPS Corporation	MRO	3, 4, 5, 6																
3.	Terry Bilke	Midwest ISO Inc	MRO	2																
4.	Jodi Jenson	Western Area Power Administration	MRO	1, 6																
5.	Ken Goldsmith	Alliant Energy	MRO	4																
6.	Alice Murdock	Xcel Energy	MRO	1, 3, 5, 6																
7.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6																
8.	Eric Ruskamp	Lincoln Electric System	MRO	1, 3, 5, 6																
9.	Joseph Knight	Great River Energy	MRO	1, 3, 5, 6																
10.	Joe DePoorter	Madison Gas & Electric	MRO	3, 4, 5, 6																
11.	Scott Nickels	Rochester Public Utilities	MRO	4																
12.	Terry Harbour	MidAmerican Energy Company	MRO	6, 1, 3, 5																
8.	Individual	JT Wood	Southern Company Transmission		X		X													

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		Commenter	Organization	Industry Segment											
				1	2	3	4	5	6	7	8	9	10		
9.	Individual	Jonathan Appelbaum	Long Island Power Authority	X											
10.	Individual	Michael Gammon	Kansas City Power & Light	X		X		X	X						
11.	Individual	James H. Sorrels, Jr.	American Electric Power	X		X		X							
12.	Individual	Kasia Mihalchuk	Manitoba Hydro	X		X		X	X						
13.	Individual	Greg Rowland	Duke Energy	X		X		X	X						
14.	Individual	Kirit Shah	Ameren	X		X		X	X						
15.	Individual	Martin Bauer	Bureau of Reclamation					X							
16.	Individual	Jason Shaver	American Transmission Company	X											
17.	Individual	Dave Allen	Operations	X											
18.	Individual	Derek Bleyle	SCE&G	X		X		X	X						
19.	Individual	Dan Rochester	Independent Electricity System Operator		X										
20.	Individual	Scott Barfield	Georgia System Operations Corporation			X	X								

1. Do you agree that either there is a reliability-related need for the proposed standards action?

Summary Consideration: Most commenters agreed that there is a reliability-related need for the proposed standard actions. Several commenters made suggestions that pertained to the standards rather than the SAR and the DT will address those during the standard drafting phase of the project.

Organization	Yes or No	Question 1 Comment
Georgia System Operations Corporation	No	It is assumed that the word "either" in question 1 was not intended since there was only one statement to agree or disagree with. There is not a reliability-related need for modifications to these standards. There is a need for clarity. Lack of clarity could possibly affect reliability if it leads to misunderstandings that may lead to wrong actions by entities. There is also a need for measurability and reasonableness of the requirements. There is a need to eliminate requirements that do not impact the BES and eliminate redundant requirements. These needs are compliance-monitoring/enforcement-related needs and not reliability-related needs. Combining these 3 standards is not necessary but would be an improvement and is supported. It is agreed that the 3 bullets of options, under the "Brief Description" section for proposed changes, are desired goals.
Response: The Drafting Team (DT) agrees with your comment. The question should read “Do you agree that there is a reliability-related need for the proposed standard action?”		
Bureau of Reclamation	No	Reclamation does not agree with the SAR as it is written. In order to properly assess the need for this project which proposes to combine three complicated set of requirements into one, the SAR must provide the specifics. The SAR has only general references to inconsistencies with the functional model, phrases such as "various words or elements that need clarification "and IRO-001 "applicability issues that must be addressed". The SAR does not adequately explain the need to combine the standards. It would be preferable to make revisions to the three standards separately under one project. Since IRO is being revised, Reclamation believes the SAR should be evaluated after the IRO-001 is revised.
Response: The DT appreciates your comment. IRO-001-1 was originally a part of this project but has been removed because all of the issues and directives associated with that standard have been addressed by the Reliability Coordination SDT, Project 2006-06. The DT will evaluate the practicality or need to combine the three EOP standards.		
American Electric Power	Yes	
American Transmission Company	Yes	

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Organization	Yes or No	Question 1 Comment
Bonneville Power Administration	Yes	
Duke Energy	Yes	
Electric Market Policy	Yes	
FirstEnergy	Yes	
Independent Electricity System Operator	Yes	
IRC Standards Review Committee	Yes	
Kansas City Power & Light	Yes	
Long Island Power Authority	Yes	
Midwest ISO Standards Collaborators	Yes	
NERC Standards Review Subcommittee	Yes	
Northeast Power Coordinating Council	Yes	
SCE&G	Yes	
Southern Company Transmission	Yes	Combining these three standards would improve documentation of applicable requirements. It would also be consistent with the work done with the System Restoration from Blackstart Resources standards. (I would not say these proposed changes are critical to improve reliability but they do present some advantages).
Response: The DT appreciates your support and comments.		

Organization	Yes or No	Question 1 Comment
Manitoba Hydro	Yes	EOP-001-0 should have the Attachment 1-EOP-001-0 and its 15 elements “assigned” to more appropriate entities. As now they are all directly assigned to TOP and BA. The consistent theme (as per FMPA) is the delegating or clarifying of various requirement responsibilities to the appropriate entities (e.g.: generation issues to TOP, transmission issues to BA)
<p>Response: The DT appreciates your support and comments. The list of issues that will be addressed by the Standard Drafting Team does include clarification of the responsible entity.</p>		
Ameren	Yes	The current standards are too vague to support reliability and too detailed in other areas where no BES benefit is accrued.
<p>Response: The DT appreciates your support and comment.</p>		
Operations	Yes	The TO's will have plans to mitigate transmission related emergencies and the BA/GO's will follow Directives to support reliability, and the TO will support capacity emergencies without compromising transmission reliability or safety. The BA's will have plans to mitigate capacity emergencies and will receive support from TO's short of compromising system reliability or safety. Your reference should point to R2.2 not R3.2
<p>Response: The DT appreciates your support and comments. When this SAR was originally drafted, the version of EOP-001 that was in effect was EOP-001-0, and it was R3.2 that included the requirement for both Transmission Operators and Balancing Authorities to develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system. When EOP-001-0 was updated and replaced with EOP-001-1, this subrequirement was renumbered as R2.2.</p>		

2. Do you agree with the scope of the proposed standards action?

Summary Consideration: The majority of commenters believed that merging the three EOP standards should be considered; a few commenters suggested that the DT not have a predetermined mindset. One commenter suggested that the DT include the NERC BOT approved version of the standards. The DT agreed with this suggestion and has modified the SAR. Several commenters made suggestions that pertained to the standards rather than the SAR and the DT will address those during the standard drafting phase of the project.

Organization	Yes or No	Question 2 Comment
Bureau of Reclamation	No	See previous comment
<p>Response: The DT appreciates your comment. IRO-001-1 was originally a part of this project but has been removed because all of the issues and directives associated with that standard have been addressed by the Reliability Coordination SDT, Project 2006-06. The DT will evaluate the practicality or need to combine the three EOP standards.</p>		
Georgia System Operations Corporation	No	The scope may be good but it may also help improve the standards and compliance monitoring or enforcement if EOP-005 would be merged together with these 3 standards included in the SAR. EOP-005 is interrelated with the 3 standards. If merging EOP-005 with the other 3 would make the resulting merged standard too long, then EOP-005 could still stand alone.
<p>Response: The DT thanks you for your comments. As EOP-005-2 was just recently completed, making additional changes before the standard has had a chance to be fully implemented would not be an efficient use of industry resources.</p>		
Ameren	Yes	
American Electric Power	Yes	
American Transmission Company	Yes	
Electric Market Policy	Yes	
Kansas City Power & Light	Yes	

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Organization	Yes or No	Question 2 Comment
Long Island Power Authority	Yes	
Midwest ISO Standards Collaborators	Yes	
NERC Standards Review Subcommittee	Yes	
Operations	Yes	
SCE&G	Yes	
Southern Company Transmission	Yes	
Bonneville Power Administration	Yes	<p>a. Agree with the idea of merging EOP-001-0, EOP-002-2, and EOP-003-1 into a single Standard. b. Requirement 8 from IRO-001-1 should be included in a new single EOP standard and removed from IRO-001-1. This would allow IRO-001-1 to apply only to Reliability Coordinators and Regional Reliability Organizations. .c. BPA supports improving clarity and removing redundant and non essential requirements (those that don't support bulk power system reliability).</p>
<p>Response: The DT appreciates your support and comments. These issues will be addressed by the Standard Drafting Team. IRO-001-1 was originally a part of this project but has been removed because all of the issues and directives associated with that standard have been addressed by the Reliability Coordination SDT, Project 2006-06.</p>		
FirstEnergy	Yes	<p>Although we agree with the scope, the team should use EOP-001-1 instead of EOP-001-0. EOP-001-1 has been NERC Board approved since October 2008 as part of the "Pre-2006" project on IROs.</p>
<p>Response: The DT appreciates your support and comments. The DT agrees with your comment and will include EOP-001-1 and EOP-001-2 in the revised SAR.</p>		
Manitoba Hydro	Yes	<p>From Brief Description: Modify requirements to improve clarity and remove ambiguity; EOP-001. Clarify or justify requirements, responsibilities as assigned to TOP and BA. (Example: In PRC-007-0 Introduction describes how each entity is responsible for the Standard or Requirement, TO has to own a UFLS, TOP has to operate UFLS, DP owns or operates UFLS, LSE operate UFLS)The above methodology removes the vagueness of why an entity is assigned a requirement. From Brief Description: Move or eliminate</p>

Organization	Yes or No	Question 2 Comment
		requirements or start new SAR process; EOP-001-0 Attachment 1 and its 15 elements require some work. These elements appear “rough” as they may have been translated from Operating Policies on the Version 0 process. Create a SAR for these items?
<p>Response: The DT appreciates your support and comments. The list of issues that will be addressed by the Standard Drafting Team does include clarification of the responsible entity. A single SAR can be used to modify several standards, so there is no need to develop a separate SAR for EOP-001 Attachment 1.</p>		
Duke Energy	Yes	Only RC responsibilities from IRO-001-1 that relate to emergency plans and operations should be included in the SAR scope. Other RC responsibilities in IRO-001-1 should remain in IRO-001-1.
<p>Response: The DT appreciates your support and comments. IRO-001 was originally a part of this project but has been removed because all of the issues and directives associated with that standard have been addressed by the Reliability Coordination SDT, Project 2006-06.</p>		
Northeast Power Coordinating Council	Yes	The SDT should not assume that the three EOP standards will be merged. EOP-001 deals with operational plans for both resource and transmission emergencies, whereas EOP-002 and EOP-003 deal with the actions needed in real-time to mitigate generation deficiency. EOP-001 is unique when compared with EOP-002, and EOP-003. Merging EOP-001 with the other two EOP standards will not result in gain in efficiency. The SDT should not assume that the three EOP standards will be merged. EOP-001 deals with operational plans for both resource and transmission emergencies, whereas EOP-002 and EOP-003 deal with the actions needed in real-time to mitigate generation deficiency. EOP-001 is unique when compared with EOP-002, and EOP-003. Merging EOP-001 with the other two EOP standards will not result in a gain in efficiency.
<p>Response: The DT appreciates your comment. The DT will evaluate the practicality or need to combine the three EOP standards.</p>		
Independent Electricity System Operator	Yes	We generally agree with the scope of the proposed actions. However, we urge the SDT not to presume or pre-determine that the three EOP standards will be merged. EOP-001 deals with operational plans for both resource and transmission emergency, whereas EOP-002 and EOP-003 deal with actions needed in real-time to mitigate generation deficiency. EOP-001 clearly has a place of its own. We do not believe that merging this together with the other two EOP standards will result in any efficiency gain.
IRC Standards Review Committee	Yes	We generally agree with the scope of the proposed actions. However, we urge the SDT not to presume or pre-determine that the three EOP standards will be merged. EOP-001 deals with operational plans for both resource and transmission emergency, whereas EOP-002 and EOP-003 deal with actions needed in real-time to mitigate generation deficiency. EOP-001 clearly has a place of its own. We do not believe that merging this together with the other two EOP standards will result in any efficiency gain.

Organization	Yes or No	Question 2 Comment
<p>Response: The DT appreciates your support and comments. The list of issues that will be addressed by the Standard Drafting Team does include clarification of the responsible entity.</p>		

3. Do you agree that the list of entities includes all those functional entities that may have one or more requirements assigned to them as part of this project? If not, please state specific reasons why not.

Summary Consideration: The majority of commenters agreed that the list of functional entities was accurate but some commenters questioned the inclusion of the DPs, TSPs, PSEs, and LSEs. The DT will consider the applicability of all functional entities throughout the Standard development phase.

Organization	Yes or No	Question 3 Comment
American Electric Power		Assessing the appropriate applicability of functional entities is part of the scope of the SAR. We believe that this is an appropriate and worthwhile effort.
Response: The DT appreciates your comments.		
Georgia System Operations Corporation		At least one requirement in the 3 existing standards applies to each of the entities listed except to a DP. As long as an existing requirement is not extended to entities not now included. If EOP-005 is merged in, it is agreed that a DP should be covered because they are involved in system restoration. It is possible that they also should be covered because they may be involved in load shedding.
Response: The DT appreciates your comments. The identification of a functional entity in the SAR does not mean that it will be included as an applicable entity in the revised standards. Its inclusion (in the scope) of the SAR allows the SDT to investigate their potential role, if any, in the revised standards. The Distribution Provider (DP) has been identified as a functional entity that 'may' have responsibility for some requirements in the revised standards. The Reliability Functional Model, Version 5, states that the DP (Real Time): Implements voltage reduction and sheds load as directed by the Transmission Operator or Balancing Authority.		
Manitoba Hydro	No	Just examining EOP-001-0 (along with its attachment) involves the following processes: Development Maintain Implement Coordination Load shedding System Restoration Fuel and Inventory Environmental constraints Customer appeals, etc. which are all placed directly on TOP and BA. For instance, Attachment 1, Element 2, Fuel Switching. Does this mean fuel energy for Diesel Backups for black start plants, or the actual supply for a Thermal Unit? Does this include coal? These elements belong directly to a GO.
Response: The DT appreciates your comments. The identification of a functional entity in the SAR does not mean that it will be included as an applicable entity in the revised standards. Its inclusion (in the scope) of the SAR allows the SDT to investigate their potential role, if any, in the revised standards. The Generator Owner has been identified as a functional entity that 'may' have responsibility for some requirements in the revised standards because of the fuel elements listed in Attachment 1.		
Electric Market Policy	No	Nothing in the SAR itself seems to justify addition of the following entities; Transmission Service Provider,

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Organization	Yes or No	Question 3 Comment
		<p>Purchasing-Selling Entity, or Load-Serving Entity. Given that, in most cases, these entities do not own physical assets (and if they do, they are probably also registered as either TO, GO or DP), do not see where including them promotes reliability. We did note that they were added in efforts related to Project 2006-06 as well as Project 2007-02. Do not agree with inclusion in Project 2007-02 and noted that many commenters also disagree with inclusion in Project 2006-06.</p>
<p>Response: The DT appreciates your comments. The identification of a functional entity in the SAR does not mean that it will be included as an applicable entity in the revised standards. Its inclusion (in the scope) of the SAR allows the SDT to investigate their potential role, if any, in the revised standards.</p>		
Kansas City Power & Light	No	<p>This should not include Transmission Service Provider, Purchase-Selling Entity. These functions provide for the normal and routine transactions for energy and transmission capacity and do not prohibit or add any reliability related actions taken by Operators.</p>
<p>Response: The DT appreciates your comments. The identification of a functional entity in the SAR does not mean that it will be included as an applicable entity in the revised standards. Its inclusion (in the scope) of the SAR allows the SDT to investigate their potential role, if any, in the revised standards.</p>		
FirstEnergy	No	<p>We are not sure how the Distribution Provider (DP) is involved in the requirements of these standards. They are checked as an applicable entity but no explanation is given as to why they are being added to these standards which currently place no responsibilities on the DP. (Note: UFLS and UVLS schemes can be and are sometimes installed on DP and LSE facilities. This would require applicability to them.)</p>
<p>Response: The DT appreciates your comments. The Distribution Provider (DP) has been identified as a functional entity that 'may' have responsibility for some requirements in the revised standards. The Reliability Functional Model, Version 5, states that the DP (Real Time): Implements voltage reduction and sheds load as directed by the Transmission Operator or Balancing Authority. The inclusion of the LSE in the SAR does not mean that they will be included as an applicable entity in the revised standards. Their inclusion (in the scope) of the SAR allows the SDT to investigate their potential role, if any, in the revised standards.</p>		
American Transmission Company	Yes	
Bonneville Power Administration	Yes	
Bureau of Reclamation	Yes	

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Organization	Yes or No	Question 3 Comment
Duke Energy	Yes	
IRC Standards Review Committee	Yes	
Long Island Power Authority	Yes	
Midwest ISO Standards Collaborators	Yes	
NERC Standards Review Subcommittee	Yes	
Northeast Power Coordinating Council	Yes	
Operations	Yes	
SCE&G	Yes	
Southern Company Transmission	Yes	
Ameren	Yes	Although as the team works through the process it might find additions or deletions need to be made to support reliability. We would offer that the drafting effort recognize this option and not force the standard based on these early assessments.
Response: The DT appreciates your support and comments.		
Independent Electricity System Operator	Yes	We believe the checked entities will largely cover the responsible entities that will be assigned at least a requirement. However, we do not think that the list needs to be exhaustive. The SDT should have the leverage to add entities as needed as it begins drafting the standards.
Response: The DT appreciates your support and comments.		

4. If you are aware of the need for a regional variance or business practice that we should consider with this SAR, please identify it here.

Summary Consideration: Most commenters did not mention any known regional variances or business practices that should be considered. However, a concern was raised on recent NAESB changes to transmission service types that may need to be addressed; either in this set of standards or by NAESB.

Organization	Yes or No	Question 4 Comment
NERC Standards Review Subcommittee		N/A
Georgia System Operations Corporation		No known variances
Electric Market Policy		None
American Electric Power		None known at this time.
SCE&G		None known.
Kansas City Power & Light		Not aware of any regional variances or business practices.
Operations		Not enough information to support making a decision on this point
Response: The DT appreciates your comment.		
Duke Energy	Business Practice	Regional Variance: The reliability gap issue with retail power marketers is only applicable to regions with RTOs/ISOs. Business Practice: EOP-002-2 deals with transmission reservations, but does not currently address Conditional Firm Service. We believe that requirements associated with the adjustment of transmission service priorities should be moved to NAESB Business Practices.
Response: The DT appreciates your comment and will address these issues during the standards drafting phase.		

5. If you have any other comments on this SAR that you have not already provided in response to the prior questions, please provide them here. Note that any comments recommending specific changes to the standards will be forwarded to the standard drafting team and will not be addressed by the SAR drafting team.

Summary Consideration: Most commenters agreed that there is a reliability-related need for the proposed standard actions. Numerous commenters mentioned the clarity of the standards needed improvement. The DT reiterated that writing clear unambiguous requirements is NERC’s goal. Numerous commenters made suggestions that pertained to the standards rather than the SAR and the DT will address those during the standard drafting phase of the project. The DT made minor changes to the wording of the SAR in response to a commenter.

- The first sentence on Page SAR-2, under Industry Need was changed to: “The industry needs standards that are technically accurate, clearly written so as to leave no confusion as to what a requirement means, and support the overall goal of ensuring bulk power system reliability.”
- In the Global Improvements section on Page SAR-13, the second sentence was modified to read: “Additionally, each standard must be clearly written, so that bulk power system users, owners, and operators are informed of the expected behavior or have knowledge of the expected behavior.” The DT has received results-based training and will incorporate these concepts into this project.
- The DT added a list of relevant interpretations to the SAR.

Organization	Question 5 Comment
Bonneville Power Administration	<p>a. In the paragraph under Industry Need, page SAR-2, suggest that the first sentence be rewritten to state as follows: "The industry needs standards that are technically accurate, clearly written so as to leave no confusion as to what a requirement means, and support the overall goal of ensuring bulk power system reliability".</p> <p>b. One concern with the EOP standards - and others - is the lack of use of the defined terms - with appropriate capitalization - from the NERC Glossary of Terms Used in Reliability Standards. The use of these terms without appropriate capitalization leads to confusion as to whether the words in the requirement mean something different than the defined term.</p> <p>c. On page SAR-10 The EOP-002-2 the comment from FERC about not using the TLR procedure to mitigate IROL violations doesn't seem right. IS FERC saying to allow an IROL to be VIOLATED (TOP-004 R1) by not changing phase shifters or ATC corrections or etc, so that a deficient entity won't be forced to shed load under a EEA? EOP-001 R2 says to have load reduction available to mitigate IROL. Or do they mean re-evaluate the IROL limits first which is already in</p>

Organization	Question 5 Comment
	<p>the standard?</p> <p>d. In Attachment 2, page SAR-12, paragraph 3, suggest rewording 2nd sentence to say "Additionally, each standard must be clearly written, so that bulk power system users, owners, and operators are informed of the expected behavior (or have knowledge of the expected behavior, rather than "put on notice")."</p>
<p>Response:</p> <p>a. The DT appreciates your comments and believes the statement as written captures your thought. Writing clear unambiguous requirements is NERC's goal.</p> <p>b. Your comments will be considered during the standard drafting phase of the project.</p> <p>c. The bullets in the SAR pertaining to the FERC directives from Order No. 693 are summaries, the full version of the directive is included in Order No. 693 Paragraph 574 through Paragraph 577.</p> <p>d. The DT agrees with your comment and has modified the SAR.</p>	
<p>Georgia System Operations Corporation</p>	<p>Declaring/communicating when an entity is in an alert level should remain in the appropriate EOP/IRO standards and not moved to a COM standard. The requirements relating to emergencies in all other groups of standards (mainly BAL, COM, IRO, and TOP) should be moved to EOP standards. The BAL, IRO, and TOP standards should cover non-emergency requirements. An exception should be requirements relating to training, drills, and tests which should be moved to the PER standards and removed from EOP and other standards. Some requirements for load shedding (e.g., automatic load shed) should be moved to PRC standards and not included in the EOP standards.</p>
<p>Response: The DT appreciates your comments. Your comments will be considered during the standard drafting phase of the project.</p>	
<p>Kansas City Power & Light</p>	<p>Do not support the notion of development of specific load shedding capability that should be provided and the maximum amount of delay before load shedding can be implemented. Each region is developing their own regional standard for load shedding and it should be left at that.</p>
<p>Response: The DT appreciates your comments. Your comments will be considered during the standard drafting phase of the project.</p>	
<p>FirstEnergy</p>	<p>FE has the following additional comments:</p> <ol style="list-style-type: none"> 1. Interpretations which have been approved should be incorporated into these standards to provide clarity. Two examples are the interpretation of EOP-001-0 per Project 2008-09 and the interpretation of EOP-002-2 per project 2008-07. 2. The SAR does not detail modifications directed by FERC Order 693 for standard IRO-001-1. The SAR should add

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	<p>these directives which include: (a) Remove Regional Reliability Organization as an applicable entity (Order 693 pp. 896); (b) Add Measures and Levels of Non-Compliance as requested by APPA (Order 693 pp. 897). Also, although not directives, FERC indicated that NERC should consider FirstEnergy Corp.'s and California Cogeneration's suggestions for improvement. These include: (a) FirstEnergy suggests that NERC clarify whether Requirement R8, which requires entities to comply with a reliability coordinator directive "unless such actions would violate safety, equipment or regulatory or statutory requirements," refers to personnel safety, equipment safety or both. In addition, it suggests the establishment of a chain of command so that, for example, if a generator receives conflicting instructions from a balancing authority and a transmission operator, it can determine which instruction governs (Order 693 pp. 893); (b) California Cogeneration comments that the Reliability Standard fails to address the operational limitations of QFs because they have contractual obligations to provide thermal energy to their industrial hosts. It contends that a QF can be directed to change operations only in the case of a system emergency, pursuant to 18 CFR Â§ 292.307 (Order 693 pp. 895)</p> <p>3. With regard to EOP-001-1 R2.1, plans to mitigate operating emergencies for insufficient generating capacity are not made in a vacuum. They must consider deliverability of the power and since the BA typically does not have sufficient information about the transmission system to ensure deliverability, the TOP has to assist in this determination.</p> <p>4. With regard to EOP-001-1 R2.2, plans to mitigate operating emergencies on the transmission system are not made in a vacuum. The Balancing Authority controls the tools used by the Transmission Operator for re-dispatching generation in order to eliminate overloads on the transmission system in instances where the overloaded facility is needed to maintain reliability. Since the TOP typically does not have sufficient information about the generation facilities outside his area of responsibility, the BA has to assist in this determination.</p> <p>5. With regard to EOP-001-0 R2 load shedding aspects, when load is shed due to insufficient voltage, the TOP is the one who has the tools to recognize the need for this load shed. However, shedding load for an under voltage condition via UFLS impacts the BA. Since this is an automatic operation, the BA needs to know where these facilities are located and how much load can be affected so they know how to react when this load shedding occurs.</p> <p>6. With regard to EOP-001-1 R4, the current requirement does specify "applicable elements in Attachment 1-EOP-001-0" which removes the items specified in the SAR as problematic and not applicable to the TOP from the list. The solution appears to be two separate lists, one for TOPs and one for BAs.</p> <p>7. With regard to Requirement R2 of EOP-003-1, the SAR table cites EOP-001-0 rather than EOP-003-1.</p> <p>8. With regard to the Real-time Best Practices Standards Study Group comment to "Establish document plans and procedures for conservative operations" it is not clear from the SAR what is expected of the drafting team for addressing this comment. Is this something that is missing from the standard? More information is needed with regard to this comment.</p> <p>9. With regard to FERC's December 20, 2007 and April 4, 2008 Orders, more information is needed with regard to what</p>

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	<p>is expected of the drafting team for addressing these items. It would be more useful to the drafting team if only the excerpts from the order that they are expected to address are included in the SAR.</p> <p>10. With regard to the Real-time Best Practices Standards Study Group comment to "Provide the location, Real-time status, and MWs of Load available to be shed," it is not clear from the SAR what is expected of the drafting team for addressing this comment. Is this something that is missing from the standard? More information is needed with regard to this comment.</p> <p>11. The SAR suggests separating the requirements relating to the TOP and BA; one for the BA and one for the TOP. However, this is not reflected in the Standard review forms. Also, this seems contrary to the industry comments contained in the review forms. The SAR should be reconciled to provide a consistent and clear message to the drafting team of what is offered for consideration and what must be included in the new standard.</p> <p>12. The Standard Review Form for EOP-002-2 makes reference to R10. Version EOP-002-2.1 included in the current version of the reliability standards does not contain an R10. The reference to this requirement should be revised to be correct or removed from the SAR.</p> <p>13. The Standard Review Form for EOP-003-1 contains a version 0 comment that states "Move to Policy 5 & 9." The reference to these policies should be revised to reflect the applicable standard or removed from the SAR.</p>
<p>Response: The DT appreciates your comments.</p> <ol style="list-style-type: none"> 1. The team has added a list of relevant interpretations to the SAR in support of your comment. 2. IRO-001-1 was originally a part of this project but has been removed because all of the issues and directives associated with that standard have been addressed by the Reliability Coordination SDT, Project 2006-06. 3. The DT will consider your comments and suggestions during the standard drafting phase of the project. 4. The DT will consider your comments and suggestions during the standard drafting phase of the project. 5. The DT will consider your comments and suggestions during the standard drafting phase of the project. 6. The DT will consider your comments and suggestions during the standard drafting phase of the project. 7. The DT thanks you for catching this mistake. The relevant standard is EOP-003-1 and will be corrected in the modified SAR. 8. The Standard Drafting Team will consider all issues listed in the SAR; as such, the SDT will discuss the idea of 'conservative operations'. 9. The DT agrees with your comment. The SDT will resolve the issue and post the resolution. 10. The Standard Drafting Team will consider all issues listed in the SAR; as such, the SDT will discuss the inclusion of this type of information in the revised standards. 	

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	<p>11. As stated in the ‘Brief Description’ on page 3 of the SAR: “The standard drafting team will review the associated items in what is termed the “NERC Standards Issues Database (Issues Database).” The Issues Database is used by the NERC standards program staff to track the issues and concerns identified with a particular standard. Prior to the development of the Issues Database, the Standard Review Form was utilized to capture all issues referencing a particular standard. The Standard Review Forms and the Issues Database excerpts applicable to these standards are listed in (Attachment 1).</p> <p>12. The DT agrees and thanks for your comment and suggestion. The VRF comments referencing Requirement R10 should reference Requirement R9.</p> <p>13. The DT agrees and will make the appropriate response to those comments. Some older comments have lost relevancy due to standard revisions.</p>
NERC Standards Review Subcommittee	N/A
American Electric Power	No additional comments at this time.
Duke Energy	None
Electric Market Policy	None
Response:	
SCE&G	SCE&G looks at consolidation of redundant requirements and standards as having a positive impact on reliability. We support this objective and feel it is necessary to improve clarity of both requirements and standards.
Response: The DT appreciates your support and comment.	
Independent Electricity System Operator	The Performance-based Reliability Standard Task Force has presented an assessment of the existing standards, a method to develop standards that support reliability performance and risk management, and is working on an overall plan to transition existing standards to a new set of standards. We view the proposed scope of this SAR is largely in line with the Performance-based Reliability Standard Task Force’s general direction, and may well be an element of the TF’s transition plan. To avoid duplicated work and to support prioritization of needed projects balancing scarce resource, we suggest the SAR proponent to liaison with Dave Taylor of NERC to identify the best way forward including whether or not this project should proceed alone and if so, the timing to start drafting the standards.

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<p>Response: The DT appreciates your support and comment, and has collaborated with the group responsible for implementing results-based standards. The DT was trained on and will be implementing the result-based concepts in this project.</p>	
<p>Long Island Power Authority</p>	<p>These comments are for the SDT. Reference is to existing standards:</p> <ol style="list-style-type: none"> 1) EOP-001 R2.3 requires plans for load shedding and so does EOP-003 2) EOP-001 R2 and R3 can be merged. 3) EOP-001 R6 - Uses the term "coordinate with other...as appropriate". How is "appropriate" determined? Suggest tie it in with existing R3.3. 4) EOP-001 R6.3 - Consider eliminating because its literal meaning means in an emergency do one or the other, not both, and nothing else. 5) EOP-001 R6.4 - Transmission Operators do not arrange for fuel deliveries to Generators. What does arranging for electrical energy through normal operating channels mean? If it's an emergency, can there be an Emergency communication protocol? 6) EOP-003 R2 and R3 - Eliminate. The under frequency load shed program is developed by the Regional Entity in PRC-006. 7) EOP-003 R5 - Poorly written. By using the word "further" it implies that either uncontrolled separation, loss of generation, or system shutdown has occurred. 8) EOP-003 R6 - Redundant to R5 because after separation, if frequency is not restored, there is a risk of further loss of generation and system shutdown. 9) EOP-003 R8 - The second requirement to be capable of implementing load shedding in a timeframe adequate for responding to the emergency can not be met in all circumstances. The problem is with the use of "the emergency". This captures all emergencies, not just the planning scenarios where manual load shedding can be deployed. 1 0) Consider Adding to the Glossary definitions for Load Shed, and Load Reduction1) Consider not using the term emergency plan. The proper term is a Plan for Emergencies.
<p>Response: The DT appreciates your comments. Your comments will be considered during the standard drafting phase of the project.</p>	
<p>Southern Company Transmission</p>	<p>Under Applicable Reliability Principles on SAR-5 I believe the following principle should be included: The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand. The goal of the actions taken during Capacity and Energy Emergencies is to return (or at attempt to return) the balance between supply and demand and eventually bring the system back to operate within</p>

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	its reliable operating frequency and voltage limits.
<p>Response: The DT agrees and appreciates your comments. The SAR will be modified appropriately to include this Reliability Principle.</p>	
Ameren	We hope that this effort is on a fast-track schedule. Additionally, this may be a group of standards that would be a good fit for treatment as suggested by Gerry Cauley and the “ad-hoc” team
<p>Response: The DT appreciates your support and comments. It is the Standards Committee’s responsibility to direct the DTs and the DT will comply with that direction. The standards developed under this project will be developed using the results-based Process suggested by Gerry Cauley.</p>	