

**Name (17 Responses)**  
**Organization (17 Responses)**  
**Group Name (10 Responses)**  
**Lead Contact (10 Responses)**

**Contact Organization (10 Responses)**

**IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. Please be sure to click on 'finish' to complete the submittal process. (0 Responses)**

**Comments (27 Responses)**  
**Question 1 (23 Responses)**  
**Question 1 Comments (23 Responses)**  
**Question 2 (23 Responses)**  
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**Question 3 Comments (23 Responses)**

Individual
B
N
Company XYZ
Individual
Michael Falvo
Independent Electricity System Operator
Yes
We agree with the response. However, we do not agree with some of the details in the section that attempts to provide clarification, excerpt below: "Most Severe Single Contingency (MSSC) – this can be the loss of the BA's or RSG's single largest operating generator, or it can be a known common mode failure that causes more than one generator to fail when the contingency occurs; or it can be a firm transaction." We do not agree the term "firm transaction". The loss of or interruption to a transaction, regardless of its firmness, represents a loss of resource which may trigger the need to comply with the DCS requirement. In other words, a temporary deficiency in a BA's resource has no distinction on whether it is caused by the loss/interruption to a firm transaction or a non-firm transaction. Further, the term "firm transaction" is subject to debate as to whether the firmness is in the energy component or in the transmission service component. If the proposed clarification is to be adopted by registered entities as a guideline for compliance (which this interpretation appears to be attempting to provide), then it can have a potential for opening up a reliability gap since a BA or an RSG may not respond to a resource contingency resulting from the loss or an interruption to a non-firm transaction (however the firmness is interpreted to be). We suggest to remove the word "firm" from the clarification section.
Yes
Yes
(1) We generally agree with the proposed interpretation. However, we are not sure if this request fits well into NERC's criteria for acceptance as a valid request since it appears that the requester asks specifically on the compliance implications and compliance elements. We suggest the interpretation drafting team (IDT) to evaluate whether or not the request is a valid one that seeks clarity on the requirements, rather than on the compliance aspects of the standard/requirements. If the IDT does assess that the questions are addressing a compliance issue, then we suggest the IDT to bring this to the attention of the Standards Committee for a determination of the appropriate means to address the questions. (2) The IESO agrees with NERC's interpretation of BAL-002. However, we believe additional discussion and thought need to be applied to other Standards to ensure that no gaps or overlaps exist in both task execution and Standard application. Different Standards obligate Reliability Entities to fulfill certain tasks as it pertains to balancing: conditions. This includes: • BAL- 002 outlines

obligations to balance following Reportable Disturbances; • EOP-002 outlines obligations to balance during Capacity and Energy Emergencies; and • TOP-001 outlines obligations to balance during System Emergencies. All of these Standards have similarities but need interpretation to ensure consistent application. These interpretations are based on an understanding of the NERC Functional Model and upon clear statements in the purpose and requirement sections in the Standards. We believe that the objective of each of the Standards list above must be clarified to reduce confusion and support consistent application.

Individual

Nazra Gladu

Manitoba Hydro

Yes

Yes

Yes

Group

Northeast Power Coordinating Council

Guy Zito

Northeast Power Coordinating Council

Yes

Yes

Yes

Individual

Thad Ness

American Electric Power

No

We do not understand the interpretation provided by the drafting team based on the requirements of BAL-002-0. As a result, we cannot endorse the interpretation provided.

No

We do not understand the interpretation provided by the drafting team based on the requirements of BAL-002-0. As a result, we cannot endorse the interpretation provided. For example, it is not clear to us exactly what "pre-acknowledged" or "dynamic" means in regards to Reserve Sharing Groups. These terms are not found anywhere within the standard itself, nor are they commonly used to describe or qualify Reserve Sharing Groups.

No

We do not understand the interpretation provided by the drafting team based on the requirements of BAL-002-0. As a result, we cannot endorse the interpretation provided.

Individual

Oliver Burke

Entergy Services, Inc.

Yes

Yes
Yes
Individual
John Appel
Public Utility District #1 of Chelan County
Chelan PUD supports the interpretation of BAL-002-0 on behalf of the NWPP.
Individual
Don Schmit
Nebraska Public Power District
Yes
The interpretation is consistent with the common understanding of the industry on how BAL-002-0 has been historically applied. We thank the IDT for the clarification.
Yes
The interpretation is consistent with the common understanding of the industry on how BAL-002-0 has been historically applied. We thank the IDT for the clarification.
Yes
The interpretation is consistent with the common understanding of the industry on how BAL-002-0 has been historically applied. We thank the IDT for the clarification.
Group
Arizona Public Service Company
Janet Smith, Regulatory Affairs Supervisor
Arizona Public Service Company
Yes
Yes
Yes
Individual
Carter Edge
SERC
No
The interpretations process is not an appropriate mechanism to address a compliance monitoring and enforcement issue. Further, the words in the requirements do not support the interpretation, no matter how much the interpretation reflects how the industry and ERO have historically approached the Disturbance Control Standard. The purpose of the Disturbance Control Standard (DCS) is to ensure the Balancing Authority is able to utilize its Contingency Reserve to balance resources and demand and return Interconnection frequency within defined limits following a Reportable Disturbance. Specifically, Requirement 1 requires each Balancing Authority to have access to and/or operate Contingency Reserve to respond to Disturbances. Prior to penalties and sanctions under Section 215, the consequence of failing DCS was to require an increase in contingency reserves. This is the "compliance evaluation" referred to under Section D. The expectation is that Balancing Areas respond to the loss of resources regardless of magnitude to restore ACE and minimize the risk to reliable operation of being "out of balance". There was recognition, however, that interconnected operations increased the reliability of the grid by reducing the consequences of a single area being out of balance at any given time and thus allowed the collective greater utilization of installed capacity to

serve load rather than retain it as contingency reserves. Thus, the concept of “most severe single contingency” (MSSC) as a criterion against which to require additional contingency reserve was employed and for large contingencies may require more time to respond. Fifteen minutes is a “benchmark” time-frame that is reasonable to expect a Balancing Area to recover from a credible contingency. There is nothing magical about that time (it used to be 10 minutes), but the BA should not “lean” on the system longer than is necessary regardless of the magnitude. Performance outside this benchmark can only be determined by an inspection of the facts and circumstances of each instance. All Balancing Authorities and Reserve Sharing Groups are required to review, no less frequently than annually, their probable contingencies to determine their prospective most severe single contingencies. The NERC glossary defines Contingency as the “unexpected failure or outage of a system component, such as a generator, transmission line, circuit breaker, switch or other electrical element”. Thus, the compliance action or inaction (“decline to pursue”) with respect to the performance of an entity against the stated requirements in the standard is a matter of the CMEP and should not be addressed through the standards interpretations process. Compliance activity should be based on the facts and circumstances of each case measured against the performance requirements of the standard. Standards (including interpretations) are for describing the behaviors and actions of registered entities necessary for the reliable planning and operation of the bulk power system not the Compliance Enforcement Authority. Informed and expert discretion rather than this interpretation (which requires inaction) is a better answer for the Reliability Assurer. Further, ALR 2-5 has a stated purpose as a measure of how much risk a system is exposed to for extreme or unusual contingencies (Simultaneous Contingencies – Multiple Contingencies occurring within one minute or less of each other shall be treated as a single Contingency. If the combined magnitude of the multiple Contingencies exceeds the most severe single Contingency, the loss shall be reported, but excluded from compliance evaluation). The results of ALR 2-5 are expected to help validate current contingency reserve requirements and document how often these “extreme or unusual” contingencies occur. These activities should continue.

No

See answer to question #1.

No

See Response to question #1.

Group

ISO-RTO Standards Review Committee

Terry Bilke

MISO

Yes

We agree with the response. However, we do not agree with some of the details in the section that attempts to provide clarification, excerpt below: “Most Severe Single Contingency (MSSC) – this can be the loss of the BA’s or RSG’s single largest operating generator, or it can be a known common mode failure that causes more than one generator to fail when the contingency occurs; or it can be a firm transaction.” We do not agree the term “firm transaction”. The loss of or interruption to a transaction, regardless of its firmness, represents a loss of resource which may trigger the need to comply with the DCS requirement. In other words, a temporary deficiency in a BA’s resource has no distinction on whether it is caused by the loss/interruption to a firm transaction or a non-firm transaction. Further, the term “firm transaction” is subject to debate as to whether the firmness is in the energy component or in the transmission service component. If the proposed clarification is to be adopted by registered entities as a guideline for compliance (which this interpretation appears to be attempting to provide), then it can have a potential for opening up a reliability gap since a BA or an RSG may not respond to a resource contingency resulting from the loss or an interruption to a non-firm transaction (however the firmness is interpreted to be). We suggest to remove the word “firm” from the clarification section.

Yes

Yes

It might be clearer if the reponse added the phrase [of the Disturbance Control Standard] after “loss

shall be reported, but excluded from compliance evaluation". Following a large event, the BA would still be accountable for other standards (e.g. IRO standards)

Group

ACES Power Marketing Standards Collaborators

Ben Engelby

ACES Power Marketing

Yes

We conceptually agree with the position of the interpretation. However, we believe that the current response expands issues that were not raised in the original question. One example is that the "MSSC value at any given time may be more or less than the annually identified prospective MSSC" is contradictory to the interpretation. How could the MSSC value could ever be higher than the list of candidate MSSCs identified in the annual review. Also, in the "reporting only" category in response 1, the IDT incorrectly characterizes that the ERO would have authority or the information to alert the BA that two (or more) contingencies must be considered as a single event and thus considered as the MSSC. The ERO does not determine the MSSC, the BA or RSG makes that determination. For simplicity and clarity, we recommend that the interpretation state: Disturbances greater than MSSC are excluded from the compliance calculation, based on the additional compliance information section of BAL-002-0. The IDT could strike everything following this statement from the interpretation and would convey the same message in a more clear and concise manner.

Yes

We largely agree with the interpretation. However, we want to point out that the concept of pre-acknowledged RSGs have disincentivized Adjacent Balancing Authorities (not in a pre-acknowledged RSG) to provide reserves in less than 10 minutes even if they are capable. If an Adjacent Balancing Authority provides emergency energy in an amount that exceeds its own MSSC with a ramp less than 10 minutes and fails to recover its ACE from within 15 minute of the initial disturbance, the Adjacent BA may be found non-compliant despite the fact the it provided the appropriate reliability assistance. Compliance should not disincentivize actions that ensure reliability.

Yes

We agree for the most part with this interpretation. However, we do have a few points we would like to address. We recommend striking the entire second paragraph because it is irrelevant. The standard does not say comply with DCS "for every reportable disturbance." The key is whether a BA is required to recover ACE within 15 minutes for contingencies greater than MSSC, and that answer is no. The IDT should keep the interpretation simple. A recommendation for wording the interpretation: A BA is not required to recover ACE within 15 minutes for contingencies greater than MSSC, as stated in section 1.4 ("Additional Compliance Information"). We recommend that the IDT reduce the amount detail in the rationale and focus on the three questions in the request. The current draft of the interpretation is wordy, confusing and provides excessive details instead of answering the questions that were asked. Also, the IDT did not state that this interpretation would apply to BAL-002-1, which has been enforceable since 4/1/2012. If NERC is going to continue with the interpretation process for BAL-002, the interpretation should apply to both versions of the standard. Finally, we encourage NERC to consolidate standard projects. There are currently 10 standard projects under development for BAL standards. NERC should consider either a consolidation to a reduced amount of BAL projects or even a single project to cover all BAL issues in order to avoid duplication, overlap, inefficient use of resources and confusion.

Group

El Paso Electric

Pablo Oñate

El Paso Electric

Yes

El Paso Electric (EPE) generally supports the first interpretation proposed by the IDT but is concerned with the language immediately following "To be clear..." because it does not acknowledge the fact that many BAs have placed responsibility in the hands of a RSG. The interpretation states that "...a BA is

responsible for the MSSC at all times...". EPE believes that this responsibility should be shared with a RSG, where appropriate. EPE would be more comfortable with an interpretation that read "To be clear a BA or RSG, as applicable, is responsible for the MSSC at all times..."

Yes

EPE generally supports the second interpretation by the IDT but requests that IDT clarify the scope of compliance evaluations for BAs who are part of a RSG and experienced a reportable event, without regard to whether any individual BA member of the RSG requested assistance. If a RSG determines that the group as a whole complied with CPS then there should be no need for any individual BA review or reporting under R5, without regard to whether the BA called for reserve activation from other RSG members, or not. The interpretation should include this clarification.

Yes

No Comment.

Individual

x

x

Individual

linda Horn

Wisconsin Electric Power Company

We are supporting the comments of MISO.

Group

Duke Energy

Greg Rowland

Duke Energy

Yes

We suggest that there should be a SAR to define the terms MSSC and "excludable disturbance" add them to the NERC Glossary.

No

It's not clear what the drafting team is saying, particularly the reference to "dynamic allocation of membership". What's the difference between pre-acknowledged RSGs and dynamically allocated RSGs, and why are the exclusion rules different?

No

It's not clear what the drafting team is saying. Does "excluded from compliance evaluation" mean that R4 does not apply to Disturbances that exceed the MSSC for a BA or RSG? Does it matter if the RSG is pre-acknowledged or dynamically allocated? The drafting team's response to Question 2 seems to indicate that it does matter. We agree that DCS is not applicable for losses greater than the MSSC, and also that DCS compliance is not required for losses less than 80% of the MSSC (or lower if a lower threshold is adopted for DCS reporting). This interpretation is performed on BAL-002-0, but the current effective standard is BAL-002-1 as of 4-1-2012. If the interpretation is approved, what is its applicability to BAL-002-1? Under BAL-002-0 the default Disturbance Recovery Period could be adjusted to better suit the needs of an Interconnection (R4.2) and the default Contingency Reserve Restoration Period could be adjusted to better suit the reliability targets of the Interconnection (R6.2), both based on analysis approved by the NERC Operating Committee. This has been deleted from both requirements in BAL-002-1.

Group

Associated Electric Cooperative Inc - JRO00088

David Dockery

Associated Electric Cooperative Inc

No

Remove: The final paragraph beginning with "The Performance Standard Reference document initially

included..." Rationale: A text-search of BAL-002-0, downloaded from the NERC website, fails to yield any instances of the word "dynamic", meaning that it appears nowhere within the four-corners of the BAL-002-0 Standard. Responsible Entities are subject only to the Standard's requirements as written and within its Effective Dates 4/1/2005 to 8/5/2010, when BAL-002-1 effectively replaced it. NERC's BOT Approved August 2, 2006 filing with The Commission appears to contain the oldest copy of FERC approved NERC Glossary of Terms Used in Reliability Standards. It contains no instances of the word "dynamic" that correspond in any way to Reserve Sharing Group membership, although "Reserve Sharing Group" and "Reportable Disturbance" are defined within that document. Although the SDT asserts the augmented concept of RSG dynamic membership, those references within this interpretation should be stricken because the "dynamic membership" concept clearly does not exist within the "four-corners of the Standard" which was balloted and approved by industry stakeholders. Instead BAL-002-0 wording indicates that each RSG can establish its own guidance, necessary to comply with the Requirements. Requirement R2 provides each Reserve Sharing Group the flexibility concerning its policies governing how it collectively fulfills its responsibility to meet Requirements R3, R4, R5 and R6. However Requirement R5's parenthetical does appear to provide some governance concerning a BA's reporting within a Reserve Sharing Group when they do not call for reserve activation from its other members, that they are subject to individually reporting their performance in responding to that event. (In either case of reporting per R5 parenthetical, the RSG's collectively-committed units' spinning-mass and short-term governor response would have fulfilled the reliability objective of this Standard, unless the Reportable Disturbance's magnitude was much greater than anticipated by the RSG in its entirety.)

No

Replace: The entire answer. With: "Yes." Rationale: In our opinion, the IDT failed to answer Question #2, which could have been answered with a simple "Yes". Instead, they appear to attempt legislating upon particulars of how all RSGs should structure portions of their policies under R2, by again referring to the concept of "dynamic membership". Our understanding is that such expansion of Standard governance can only be done under SDT effort and subsequent industry approval through the ballot process. (See AECl's earlier response to Question 1 above.)

Yes

We agree with this summary determination. In addition, the August 2, 2006 NERC BOT approved, and subsequently FERC accepted Glossary definition for Reportable Disturbance clearly specified that the definition "not be retroactively adjusted in response to observed performance", adding weight to this drafting-team's response to Question 3. (FERC\_Filing\_Proposed\_Reliability\_Standards\_Docket\_RM06-16-000.pdf)

Individual

Greg Travis

Idaho Power Co.

Yes

Yes

Yes

Group

Bonneville Power Administration

Chris Higgins

Transmission Reliability Program

Yes

Yes

Yes
BPA is in support of BAL-002-0 Interpretation and has no comments or concerns at this time.
Group
SPP Standards Review Group
Robert Rhodes
Southwest Power Pool
Yes
This interpretation is consistent with the common understanding of the industry on how BAL-002-0 has been historically applied. We thank the IDT for the clarification.
Yes
Again, this interpretation is consistent with the common understanding of the industry on how BAL-002-0 has been historically applied. We thank the IDT for the clarification.
Yes
Again, this interpretation is consistent with the common understanding of the industry on how BAL-002-0 has been historically applied. We thank the IDT for the clarification.
Individual
RoLynda Shumpert
South Carolina Electric and Gas
Yes
Yes
Yes
Individual
Anthony Jablonski
ReliabilityFirst
No
ReliabilityFirst votes in the Negative for the Interpretation of BAL-002 since ReliabilityFirst believes the drafted interpretation to Question 1 incorrectly expands on the language in Requirement R4 and incorrectly attempts to explain how to comply with the Requirement. If a reportable disturbance occurs (i.e. contingencies that are greater than or equal to 80% of the most severe single Contingency) and is greater than the most severe single Contingency, ReliabilityFirst questions why an entity would not be required to meet the Disturbance Recovery Criterion. Nowhere within the requirements are there exceptions for Reportable Disturbance greater than the most severe single Contingency. Based on R4, the applicable entity "...shall meet the Disturbance Recovery Criterion within the Disturbance Recovery Period for 100% of Reportable Disturbances". For example, if an entity failed to meet the meet the Disturbance Recovery Criterion for a disturbance equaling 110% of their most severe single Contingency, they would potentially be found non-compliant. In addition, ReliabilityFirst does not believe the quasi definition of "Simultaneous Contingencies" within the "Additional Compliance Information" is not enforceable since it is not a Reliability Requirement, and is not even a NERC Defined term.
Yes
ReliabilityFirst disagrees with the drafted interpretation. Regardless of the references to outside sources (the reserve requirement specified in R3.1 of BAL-002-0, the text of Section 1.4 of Part D of BAL-002-0, and the documented history of the development of BAL-002-0), compliance is to be assessed on a requirement by requirement basis. Requirement R4 requires that an applicable entity "...shall meet the Disturbance Recovery Criterion within the Disturbance Recovery Period for 100% of



Reportable Disturbances". Clearly, there is no exception listed within the requirements for Reportable Disturbances greater than the most severe single Contingency.

Individual

Maggy Powell

Exelon Corporation

Yes

Yes

No

Response 3 of the interpretation that requests clarification on the phrase "excluded from compliance evaluation" could be clearer. The first portion of the response gives the impression that the IDT is of the opinion that the obligation to comply with the DCS extends to events larger in magnitude than the MSSC. The paragraphs that follow go on to clarify that an event greater than the MSSC would not be required to recover ACE within 15 minutes, making compliance with the DCS not mandated in these instances. The latter (disturbances exceeding the MSSC being excluded from DCS compliance and 15 minute recovery) is consistent with practice and in line with the interpretation indicated by the NWPP. In order to more fully clarify the interpretation, the IDT should make clear that compliance with the DCS is not mandated for disturbances exceeding the MSSC.

Group

SERC Operating Committee Standards Review Team

Gerald Beckerle

Ameren

Yes

The SERC OC Standards Review Group gladly presents the following comments. The SERC OC Standards Review Group agrees only with the interpretation portion of the response. The Group strongly disagrees there is a need for the additional explanation of the interpretation. The explanation presents more confusion and questions around the Standard. The simple interpretation is very clear and concise.

No

The SERC OC Standards Review Group feels the interpretation and clarification are both very confusing, thus raising numerous other questions. The use of the words "pre-acknowledged RSGS" and "dynamic allocated RSGS" appear to be new terms introduced in the response. Also, a reference to a Technical Document is made in the response. The Group is unsure of what Technical Document the IDT is referring. Nor does the Group understand if such reference to the Technical Document is an agreement with such document by the IDT or if the Technical Document is referenced as to be included in the response and subject to being opened and the processes and procedures of such document being made part of a compliance audit.

Yes

NONE

Individual

Brent Ingebrigtsen

LG&E and KU Services Company

No

The IDT's explanation of MSSC may be unnecessary and confusing, especially statements such as: "MSSC is a variable that the BA knows and operates to in real time." "Thus the BA knows its MSSC which can vary from hour to hour and minute to minute." "To be clear a BA is responsible for the MSSC at all times (the MSSC value at any given time may be more or less than the annually identified prospective MSSC)." In the absence of an identifiable/specific reason, which is recognized by the BA

in advance, the real-time MSSC should not exceed the prospective MSSC. Unless such an abnormal situation exists, all evaluations of DCS compliance must be based on the prospective MSSC value. The IDT needs to be very clear with any language suggesting that the real-time MSSC can exceed the planned/recognized/"prospective" MSSC. If a disturbance exceeds the planned/recognized/"prospective" MSSC value, it is outside the definition of MSSC and should not be subject to compliance evaluation. The requirement for a prospective MSSC is for the MSSC be used for planning purposes, not for real-time operations, even though it is used in such operations. MSSC is not a defined term in the NERC Glossary but work is in progress under NERC Project 2010-14.1 to develop a definition of MSSC. Therefore, it would not be in the best interest of the IDT in providing this interpretation to attempt to describe or define MSSC. LGE and KU Services recommends all language related to the IDT's explanation of MSSC be deleted from Response 1. Also, the language explaining the "Compliance and reporting category" and "Reporting only category" appears to be outside the inquiry of Question 1 and is suggested for deletion. LGE and KU Services suggests Response 1 be reduced to simply the first sentence of the response as it clearly answers Question 1: "The IDT agrees that the Disturbance would be excluded from compliance."

No

The meaning and use of the adjectives "pre-acknowledged" and "dynamically allocated" in description of RSG in Response 2 seem to be unnecessary, confusing and beyond the scope of Question 2. As stated in Response 2, there is a NERC Glossary definition of RSG and that is the subject of Question 2 – not the applicability of R5 to organizational variations of RSGs. The IDT has referenced a "Technical Document" that has not been included in the posting. The content therefore of the Technical Document is unknown. LGE and KU Services suggests Response 2 be reduced to only the language used in the "In summary,...." portion of the response as it clearly answers Question 2, edited as follows: "The Standard was written to provide RSGs the same considerations as a single BA for purposes of exclusions from DCS compliance evaluation. Thus for a RSG the exclusion rules would be used in the same manner as they would be used for a single BA. This applies to both multiple contingencies occurring within one minute or less of each other being treated as a single Contingency and to Contingencies that occur after one minute of the start of a Reportable Disturbance but before the end of the Disturbance Recovery Period."

Yes

Individual

Cheryl Moseley

Electric Reliability Council of Texas, Inc.

ISO SRC

No

ERCOT agrees with the SRC comments. However, in addition to the SRC comments, ERCOT offers the following: ERCOT does not agree with additional details in the section that attempts to provide clarification. See the two excerpts below: Quote from Additional Compliance Information section: "To be clear a BA is responsible for the MSSC at all times (the MSSC value at any given time may be more or less than the annually identified prospective MSSC). An undefined "common mode" failure can occur but it is exempted from R4's requirement to meet the BA's or RSG's disturbance recovery criteria within the Disturbance Recovery Period. An undefined common mode failure (i.e. a disturbance that exceeds the MSSC) must be reported to allow the ERO to help ensure that it is not a continuing condition." There should be a period after the word "reported" and the phrase "to allow the ERO to help ensure that it is not a continuing condition." should be struck and removed. Quote from Additional Compliance Information section: "The Reporting only category is designed to track multiple contingency events that are not subject to Requirement R4. This category is designed to ensure that common mode (single point of failures) events are not missed. Thus if two or more contingencies repeatedly occur, the expectation was that the ERO would have the information to alert the BA that the two contingencies must be considered as a single event and thus considered as the MSSC." The entire last sentence should be struck and removed. BA's are the functional entities responsible for coordinating with RC's, other BAs, TOPs, and GOPs to determine if a common mode failure requires a different MSSC. The ERO (NERC) is an oversight entity responsible for developing reliability standards and monitoring and enforcing compliance with those standards. It is not a functional entity. As such, it has no role in functional responsibilities, including the establishment of single contingencies and

operating to respect such contingencies in accordance to the applicable NERC standards and requirements. Accordingly, it is inappropriate for the interpretation to suggest, either directly or indirectly, that the ERO is in a position to monitor contingencies on the system, common mode or otherwise, to determine if such reoccurrences warrant consideration of multiple contingencies as a single contingency that could serve as an areas MSCC. There is explicit language in the interpretation that places the ERO in this role. Because this exceeds the scope of the ERO's functions and authority the interpretation must be revised to remove the problematic language. The above revisions are intended to address this issue, and ERCOT respectfully suggests the SDT make the suggested deletions.

Yes

ERCOT agrees with the SRC comments.

Yes

ERCOT agrees with the SRC comments.

Individual

Brett Holland

Kansas City Power & Light

Yes

Yes

Yes