Definition of BES

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=c257161b7bda4eae9ad643abd0dee09a) to submit comments on the SAR. The electronic comment form must be completed by **February 3, 2012.**

If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 1.609.947.3673.

[2010-17 Definition of BES project page](http://www.nerc.com/filez/standards/Project2010-17_BES.html)

Background Information

This posting is for soliciting comment.

This SAR is a direct result of the industry comment periods for Project 2010-17 Definition of BES Phase 1 where the industry indicated a need for further detailed examination of the technical concepts underlying the BES definition. Due to time constraints in Phase 1 brought about by the FERC Orders driving the revised definition, any expansion of the scope of Phase 1 was deferred to Phase 2 where time deadlines would be less of an issue. The language of the SAR is such that any and all aspects of the Phase 1 definition are open to discussion and possible revision. However, the SDT outlined some of the major points that were brought up in Phase 1 by bulleting them in the SAR description. The SDT does not consider this list to be an all exclusive one – it is simply a brief listing of those issues that were identified in Phase 1.

You do not have to answer all questions. Enter all comments in simple text format. Bullets, numbers, and special formatting will not be retained.

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

The scope of this project includes:

Collect and analyze information needed to support revisions to the definition of BES developed in Phase 1 of this project to provide a technically justifiable definition that identifies the appropriate electrical components necessary for the reliable operation of the interconnected transmission network. The definition development will include an analysis of the following issues which were identified during the development of Phase 1 of Project 2010-17 Definition of the BES. Clarification of these issues will appropriately define which Elements are necessary for the reliable operation of the interconnected transmission network.

* Develop a technical justification to set the appropriate threshold for Real and Reactive Resources used in the operation of the Bulk Electric System (BES)
* Determine if there is a technical justification to support the assumption that there is a reliability benefit of a contiguous BES
* Determine if there is a technical justification for the equipment which “supports” the reliable operation of the BES but is installed on the distribution system
* Determine if there is a technical justification to support an automatic interrupting device in Exclusions E1 and E3
* Determine if there is a technical justification to support the inclusion of Cranking Paths and Blackstart Resources
* Determine if there is a technical justification for selection of 100 kV as the bright-line voltage level
* Determine if there is a technical justification to support allowing power flow out of the local network under certain conditions and if so, what the maximum allowable flow should be

Provide improved clarity to the following:

* The relationship between the BES definition and the ERO Statement of Compliance Registry Criteria established in FERC Order 693
* The use of the term “non-retail generation”
* The language for Inclusion I4 on dispersed power resources
* The appropriate ‘points of demarcation’ between Transmission, Generation, and Distribution

Phase 2 of the definition development may include other improvements to the definition as deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing a high quality and technically justifiable definition of the Bulk Electric System (BES).

Based on the potential revisions to the definition of the Bulk Electric System (BES) and an analysis of the application of, and the results from, the exception process, the drafting team will review and if necessary propose revisions to the ‘Technical Principles’ associated with the Rules of Procedure Exception Process to ensure consistency in the application of the definition and the exception process.

1. Do you agree with this scope? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

The SDT has identified several issues that are included in the scope of Phase 2 of the project that are associated with the technical aspects of the definition and require technical justification to drive a revision to the definition. Compelling technical justification is an essential component in moving any revision forward that addresses the technical nature of the BES definition. The SDT is seeking to identify existing technical justifications (i.e., completed studies, technical papers, etc.) and requests your assistance to properly identify resources available to the SDT which will facilitate the SDT’s work in prioritizing its efforts.

Note: The SDT does not intend to respond to all responses associated with an entity’s knowledge of existing technical justification (i.e. analysis methodologies, completed studies, technical papers, etc.). The SDT is collecting potential resources that could assist in the development of compelling technical justification.

2. Do you agree that the SDT should pursue the development of technical justification to set thresholds for Real and Reactive Power Resources used in the reliable operation of the BES different from those presently existing in the BES definition?

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of existing technical justification (i.e., analysis methodologies, completed studies, technical papers, etc.) that would assist the SDT in the development of technical justification for this issue? If so, please provide details in the ‘Comments’ field.

[ ]  Yes

[ ]  No

Comments:

3. Do you agree that the SDT should pursue technical justification that supports the assumption that there is a reliability benefit of a contiguous BES?

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of existing technical justification (i.e., analysis methodologies, completed studies, technical papers, etc.) that would assist the SDT in the development of technical justification for this issue? If so, please provide details in the ‘Comments’ field.

[ ]  Yes

[ ]  No

Comments:

4. Do you agree that the SDT should pursue technical justification for including in the BES definition the equipment which “supports” the reliable operation of the BES?

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of existing technical justification (i.e. analysis methodologies, completed studies, technical papers, etc.) that would assist the SDT in the development of technical justification for this issue? If so, please provide details in the ‘Comments’ field.

[ ]  Yes

[ ]  No

Comments:

5. Do you agree that the SDT should pursue technical justification to support including an automatic interrupting device in Exclusions E1 and E3?

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of existing technical justification (i.e., analysis methodologies, completed studies, technical papers, etc.) that would assist the SDT in the development of technical justification for this issue? If so, please provide details in the ‘Comments’ field.

[ ]  Yes

[ ]  No

Comments:

6. Do you agree that the SDT should pursue technical justification to support the inclusion of Cranking Paths in the BES definition and to retain Blackstart Resources as part of the BES definition?

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of existing technical justification (i.e., analysis methodologies, completed studies, technical papers, etc.) that would assist the SDT in the development of technical justification for this issue? If so, please provide details in the ‘Comments’ field.

[ ]  Yes

[ ]  No

Comments:

7. Do you agree that the SDT should pursue technical justification for selection of 100 kV as the bright-line voltage level?

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of existing technical justification (i.e. analysis methodologies, completed studies, technical papers, etc.) that would assist the SDT in the development of technical justification for this issue? If so, please provide details in the ‘Comments’ field.

[ ]  Yes

[ ]  No

Comments:

8. Do you agree that the SDT should pursue technical justification to support allowing power flow out of the local network under certain conditions and if so, what the maximum allowable flow should be?

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of existing technical justification (i.e., analysis methodologies, completed studies, technical papers, etc.) that would assist the SDT in the development of technical justification for this issue? If so, please provide details in the ‘Comments’ field.

[ ]  Yes

[ ]  No

Comments:

9. Do you have any other issues that require technical justification that you feel need to be added to the SAR? If so, please provide a detailed explanation of the issue and why it should be included.

[ ]  Yes

[ ]  No

Comments:

10. Do you have any other issues that are associated with improving the clarity of the definition created in Phase 1 that will assist the Registered Entity in the identification of BES Elements without altering the intent or scope of the definition? If so, please provide a detailed explanation of the issue and why it should be included.

[ ]  Yes

[ ]  No

Comments:

11. Are you aware of any regional variances associated with approved NERC Reliability Standards that will be needed as a result of this project? If yes, please identify the Regional Variance.

[ ]  Yes

[ ]  No

Comments:

12. Are you aware of any business practice that will be needed or that will need to be modified as a result of this project? If yes, please identify the business practice:

[ ]  Yes

[ ]  No

Comments:

13. If you have any other comments on this SAR that you haven’t already mentioned above, please provide them here:

 Comments: