

## Comment Report

**Project Name:** NERC Standard Processes Manual | Sections 2.1, 3.7, 6, 7, 8 & 11  
**Comment Period Start Date:** 3/20/2017  
**Comment Period End Date:** 5/3/2017  
**Associated Ballots:** NERC Standard Processes Manual Sections 2.1, 3.7, 6, 7, 8 & 11 IN 1 OT

There were 42 sets of responses, including comments from approximately 129 different people from approximately 92 companies representing 10 of the Industry Segments as shown in the table on the following pages.

## **Questions**

- 1. Do you agree with the revisions to Section 6.0 of the SPM?**
- 2. Do you agree the technical committees (e.g., Operating Committee, Planning Committee, and Critical Infrastructure Protection Committee) should administer the Field Tests?**
- 3. Do you have any other comments concerning Section 6.0 of the SPM?**
- 4. Do you agree with the revisions to Section 7.0 of the SPM?**
- 5. Do you agree with the proposed process for posting and balloting Interpretations?**
- 6. Do you have any other comments concerning Section 7.0 of the SPM?**
- 7. Do you agree with the revisions to Section 11.0 of the SPM?**
- 8. Do you agree with the proposed process for vetting documents that may be posted as a supporting document to an approved Reliability Standard?**
- 9. Do you have any other comments concerning Section 11.0 of the SPM?**
- 10. Do you agree that an appellant should be able to withdraw its Level 1 or Level 2 appeal under Section 8 of the SPM by providing written notice to the NERC Director of Standards?**
- 11. Do you have any comments concerning the non-substantive updates to Sections 2.1 and 3.7 of the SPM?**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
ACES Power Marketing	Brian Van Gheem	6	NA - Not Applicable	ACES Standards Collaborators	Tara Lightner	Sunflower Electric Power Corporation	1	SPP RE
					Greg Froehling	Rayburn Country Electric Cooperative, Inc.	3	SPP RE
					Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	RF
					Mark Ringhausen	Mark Ringhausen	3,4	SERC
					John Shaver	Arizona Electric Power Cooperative, Inc.	1	WECC
					Bill Hutchison	Southern Illinois Power Cooperative	1	SERC
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Ginger Mercier	Prairie Power, Inc.	1,3	SERC
					Laurel Heacock	Oglethorpe Power Corporation	5,6	SERC
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
Scott Brame	North Carolina Electric Membership Corporation	3,4,5	SERC					
Chris Gowder	Chris Gowder		FRCC	FMPA	Tim Beyrle	City of New Smyrna Beach	4	FRCC
					Jim Howard	Lakeland Electric	5	FRCC

					Lynne Mila	City of Clewiston	4	FRCC
					Javier Cisneros	Fort Pierce Utility Authority	3	FRCC
					Randy Hahn	Ocala Utility Services	3	FRCC
					Don Cuevas	Beaches Energy Services	1	FRCC
					Jeffrey Partington	Keys Energy Services	4	FRCC
					Tom Reedy	Florida Municipal Power Pool	6	FRCC
					Steve Lancaster	Beaches Energy Services	3	FRCC
					Mike Blough	Kissimmee Utility Authority	5	FRCC
					Mark Brown	City of Winter Park	4	FRCC
					Chris Adkins	City of Leesburg	3	FRCC
					Ginny Beigel	City of Vero Beach	9	FRCC
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
MGE Energy - Madison Gas and Electric Co.	Joseph DePoorter	4		MRO NSRF	Joseph DePoorter	MGE	1,2,3,4,5,6	MRO
					Joseph DePoorter	MGE	1,2,3,4,5,6	MRO
DTE Energy - Detroit Edison Company	Karie Barczak	3		DTE Energy - DTE Electric	Jeffrey Depriest	DTE Energy - DTE Electric	5	RF
					Daniel Herring	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
Associated Electric	Mark Riley	1			Mark Riley	Associated Electric	1	SERC

Cooperative,  
Inc.

AECI &  
Member  
G&Ts

	Cooperative, Inc.		
Brian Ackermann	Associated Electric Cooperative, Inc.	6	SERC
Brad Haralson	Associated Electric Cooperative, Inc.	5	SERC
Todd Bennett	Associated Electric Cooperative, Inc.	3	SERC
Michael Bax	Central Electric Power Cooperative (Missouri)	1	SERC
Adam Weber	Central Electric Power Cooperative (Missouri)	3	SERC
Ted Hilmes	KAMO Electric Cooperative	3	SERC
Walter Kenyon	KAMO Electric Cooperative	1	SERC
Stephen Pogue	M and A Electric Power Cooperative	3	SERC
William Price	M and A Electric Power Cooperative	1	SERC
Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	SERC
Kevin White	Northeast Missouri Electric Power Cooperative	1	SERC
Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC
John Stickley	NW Electric Power	3	SERC

						Cooperative, Inc.		
					Jeff Neas	Sho-Me Power Electric Cooperative	3	SERC
					Peter Dawson	Sho-Me Power Electric Cooperative	1	SERC
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Katherine Prewitt	Southern Company Services, Inc.	1	SERC
					R. Scott Moore	Alabama Power Company	3	SERC
					William D. Shultz	Southern Company Generation	5	SERC
					Jennifer G. Sykes	Southern Company Generation and Energy Marketing	6	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no Dominion	Paul Malozewski	Hydro One.	1	NPCC
					Guy Zito	Northeast Power Coordinating Council	NA - Not Applicable	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Bruce Metruck	New York Power Authority	6	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC

					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Sylvain Clermont	Hydro Quebec	1	NPCC
					Si Truc Phan	Hydro Quebec	2	NPCC
					Helen Lainis	IESO	2	NPCC
					Laura Mcleod	NB Power	1	NPCC
					Michael Forte	Con Edison	1	NPCC
					Kelly Silver	Con Edison	3	NPCC
					Peter Yost	Con Edison	4	NPCC
					Brian O'Boyle	Con Edison	5	NPCC
					Greg Campoli	NY-ISO	2	NPCC
					Michael Schiavone	National Grid	1	NPCC
					Michael Jones	National Grid	3	NPCC
					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
					Kathleen M. Goodman	ISO-NE	2	NPCC
Dominion - Dominion Resources, Inc.	Sean Bodkin	6		Dominion	Connie Lowe	Dominion - Dominion Resources, Inc.	3	NA - Not Applicable
					Lou Oberski	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
					Larry Nash	Dominion - Dominion Virginia Power	1	NA - Not Applicable

Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	2	SPP RE
					Deborah McEndafffer	Midwest Energy, Inc	NA - Not Applicable	NA - Not Applicable
					Robert Gray	Board of Public Utilities (BPU) Kansas City, Kansas	3	SPP RE
					Rober Hirschak	Cleco	1,3,5,6	SPP RE
					Ellen Watkins	Sunflower Electric Power Corporation	1	SPP RE
PPL NERC Registered Affiliates	Shelby Wade	1,3,5,6	RF,SERC	PPL NERC Registered Affiliates	Charlie Freibert	LG&E and KU Energy, LLC	3	SERC
					Brenda Truhe	PPL Electric Utilities Corporation	1	RF
					Dan Wilson	LG&E and KU Energy, LLC	5	SERC
					Linn Oelker	LG&E and KU Energy, LLC	6	SERC

**1. Do you agree with the revisions to Section 6.0 of the SPM?**

**LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6**

**Answer** No

**Document Name**

**Comment**

The new Section 6.2 "Communication and Coordination for All Types of Field Tests" states "After approval of the field test, the drafting team may request waivers of compliance for field test participants ...". This language leaves no room to identify and request waivers of compliance (waivers) at the time the field test is requested, when such waivers are known to be required as part conducting an effective field test.

Waivers necessary for successful field test data collection, if known, should be identified at the time a field test is requested because such information informs the field test approval process. Further, if waivers are needed as part of a field test, then not receiving approval for them would render the field test ineffective and make a request for a field test inappropriate.

Likes 2 Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex; Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne

Dislikes 0

**Response**

**Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates**

**Answer** No

**Document Name**

**Comment**

Section 6.1.2 (Field Test Suspension for Reliability Concerns) sets forth the process related to situations in which the field test is stopped or modified because it is creating a reliability risk to the Bulk Power System. It provides that in order for a field test to be restarted after being stopped, the drafting team must resubmit the filed test request and receive approval. However, it is unclear whether modification (not stoppage) would require resubmittal per Section 6.1.1 (Field Test Approval). If modification of the activity would also require resubmittal of the field test request, then the last sentence contained in Section 6.1.2 should be revised as follows: "Prior to the field test being restarted after it has been stopped or modified, the drafting team must resubmit the field test request and receive approval as outlined in Section 6.1.1."

With regard to the public posting of the field test plan and reports and results, the last sentence in the proposed Section 6.2 (Communication and Coordination for All Types of Field Tests) should be revised to provide for a deliberate consideration of potential impact on security and reliability. The sentence should be revised as follows: "The filed test plan and all reports and results (including the participant list) shall be publicly posted on the NERC web site, unless it is determined that such public posting would present reliability, confidentiality, or other concerns."

Likes 0

Dislikes 0

**Response**

**Michelle Amarantos - APS - Arizona Public Service Co. - 1**

**Answer** No

**Document Name**

**Comment**

The added sentence on the first paragraph of section 6 should be revised to clarify that if a field test is run, drafting teams are required to analyze the collected data.

Likes 0

Dislikes 0

**Response**

**Michael Haff - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC**

**Answer** No

**Document Name**

**Comment**

Adopt the comments of the National Rural Electric Cooperative Association (NRECA).

Additionally, concerning the major changes to Section 6.0 starting on page 28:

- a. Before any field tests are performed, a cost/benefit analysis of any resulting regulation should be performed;
- b. All communications between the drafting team, NERC, and any testing contractors (or other related parties), should be publicly available unless they meet CEII, NERC CIP restricted, etc.; and
- c. There should be the potential for a peer-review process of any field test results.

Likes 0

Dislikes 0

**Response**

**Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC**

**Answer** No

**Document Name**

**Comment**

SCE has concerns regarding the proposed revisions to Section 6, the “Process for Conducting field Tests”. The last sentence of the first paragraph in Section 6.0 states that “drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard.” This sentence is open to interpretation and should be clarified that drafting teams are accountable to conduct a field test when required to do so by an approved SAR. Additionally, in the event that a field test has the ability to expose the grid to reliability concern or does not provide sufficient information to formulate a conclusion, as identified in revision to Section 6.1.2 and 6.1.3, SCE believes the entire project should be recommended for withdrawal. Instead, the proposed revision gives the SDT the capability to move a project forward by terminating a field test with the approval of the lead NERC technical committee and only provide notification to the Standards Committee chair. In an extreme circumstance this could end with a new/ revised standard, with a failed or incomplete field test, moving onto the balloting phase of the standards development lifecycle. In this manner, the new language to Section 6 transfers the ultimate authority for the development of a standard from the Standards Committee, which approved a SAR with contingencies, to the lead NERC technical committee which may lack proper representation of the affected industry segments. SCE recognizes not every standard or requirement requires a field test, but in those rare instances where a field test is necessary to properly develop a standard and/ or requirement(s), as indicated by an approved SAR, the Standards Process Manual should not include provisions for a drafting team to fail to perform the field test.

Likes 0

Dislikes 0

**Response**

**Romel Aquino - Edison International - Southern California Edison Company - 3**

**Answer** No

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.

Likes 0

Dislikes 0

**Response**

**Mark Riley - Associated Electric Cooperative, Inc. - 1, Group Name AECI & Member G&Ts**

**Answer** No

**Document Name**

**Comment**

AECI & its member G&Ts support the National Rural Electric Cooperative Association's comments listed below:

Is the current SAR form set up properly for a field test-only request? It's unclear to us if it is.

In 6.1, the second and third bullet, in the second bullet it states that the technical committee “oversees” the field test and then the in the third bullet it states that the field test is “conducted” by the drafting team. We believe this language is confusing on roles and responsibilities – what is the difference

between “oversees” and “conducted” as used in these bullets? We believe that this needs to be clarified in this section so that the drafting team and the technical committee clearly understand their roles and responsibilities.

In 6.1.1, the first paragraph on page 29 of the redline, second sentence, the following language should be added at the end of the sentence “prior to conducting a field test.”

In the second paragraph on page 29 of the redline, first line, it’s unclear what “technical adequacy” means in this context. This should be explained further in this paragraph. In the same paragraph, 5th line, who is intended to receive the “communicating status” of the results of the field test? This should be made clear in this paragraph.

In the third paragraph on page 29 of the redline, first line, it states that the SC’s decision to approve the field test “shall be based solely.....” when the SC votes on the technical committee’s recommendation. Is the SC voting on process or technical issues here? It seems the SC should only be voting on process, not on evaluating technical issues. This paragraph might need to be revised to clarify what the SC is approving here as it relates to the authorities in the SC charter and other governing documents.

In Section 6.1.2, first sentence, the beginning of the sentence should be changed to “During the field test *being conducted by the drafting team.....*” (new text is in italics and underlined)

On page 30 of the redline, in the new 6.2, first sentence, the following new text should be added – “After approval of the field test, *but prior to the start,.....*” (new text is in italics and underlined.) Also on the 9th line of this paragraph the following new text should be added to “responsible for approving any modifications or terminations, *prior to any compliance PV’s that could be issued otherwise,.....*” (new text is in italics and underlined)

Likes 0

Dislikes 0

### Response

**Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2**

Answer

No

Document Name

Comment

See comments for Question #3

Likes 0

Dislikes 0

### Response

**Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators**

Answer

No

Document Name

Comment

It appears the documents to support the request to conduct a field test are separate documents. We believe the implementation schedule and list of expectations for periodic updates should all be incorporated into the field test plan. Moreover, the test plan should identify upfront if the participant list will be made public at a later date or identify potential confidentiality and other concerns. Furthermore, we believe the test plan should be updated to reflect trial extensions as they occur.

Likes 0

Dislikes 0

### Response

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name** Southern Company

**Answer**

No

**Document Name**

**Comment**

See Section 6.1.3. It is unclear as to why a field test would extend beyond the period of Standard development if the reason for conducting a field test is to validate concepts that form the basis for a new or revised NERC requirement. This is supported by the statement in Section 6.1 that the field test should be conducted prior to issuance of a SAR. So, it seems important enough to the authors of this SPM to have the results of the field test prior to even initiating the Standards development process. It seems to me that if a field test is initiated after the start of the Standards development process then the field test schedule would actually drive the Standard development schedule to a certain degree. They couldn't be independent.

Likes 0

Dislikes 0

### Response

**Barry Lawson - National Rural Electric Cooperative Association - 3,4**

**Answer**

No

**Document Name**

**Comment**

NRECA has the following comments:

Is the current SAR form set up properly for a field test-only request? It's unclear to us if it is.

In 6.1, the second and third bullet, in the second bullet it states that the technical committee "oversees" the field test and then the in the third bullet it states that the field test is "conducted" by the drafting team. We believe this language is confusing on roles and responsibilities – what is the difference between "oversees" and "conducted" as used in these bullets? We believe that this needs to be clarified in this section so that the drafting team and the technical committee clearly understand their roles and responsibilities.

In 6.1.1, the first paragraph on page 29 of the redline, second sentence, the following language should be added at the end of the sentence "prior to conducting a field test."

In the second paragraph on page 29 of the redline, first line, it's unclear what "technical adequacy" means in this context. This should be explained further in this paragraph. In the same paragraph, 5th line, who is intended to receive the "communicating status" of the results of the field test? This should be made clear in this paragraph.

In the third paragraph on page 29 of the redline, first line, it states that the SC's decision to approve the field test "shall be based solely....." when the SC votes on the technical committee's recommendation. Is the SC voting on process or technical issues here? It seems the SC should only be voting on process, not on evaluating technical issues. This paragraph might need to be revised to clarify what the SC is approving here as it relates to the authorities in the SC charter and other governing documents.

In Section 6.1.2, first sentence, the beginning of the sentence should be changed to "During the field test *being conducted by the drafting team.....*" (new text is in italics and underlined)

On page 30 of the redline, in the new 6.2, first sentence, the following new text should be added – "After approval of the field test, *but prior to the start,.....*" (new text is in italics and underlined.) Also on the 9th line of this paragraph the following new text should be added to "responsible for approving any modifications or terminations, *prior to any compliance PV's that could be issued otherwise,.....*" (new text is in italics and underlined)

Likes 0

Dislikes 0

### Response

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

### Response

**Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF**

**Answer**

Yes

**Document Name**

**Comment**

We question if a field test would ever make an entity non-compliant with an existing Standard? If so, should there be a section on making the field testing entity exempt from being found non-compliant with an effective Standard during the field test? We believe this wording should be within Section 6.

Likes 0

Dislikes 0

**Response**

**David Kiguel - David Kiguel - 8**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Andrew Gallo - Austin Energy - 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Steven Rueckert - Western Electricity Coordinating Council - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

**Response**

**Chris Scanlon - Exelon - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion**

**Answer** Yes

**Document Name**

<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Karl Blaszkowski - CMS Energy - Consumers Energy Company - 1,3,4,5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Chris Gowder - Chris Gowder On Behalf of: Carol Chinn, Florida Municipal Power Agency, 5, 6, 4, 3; David Schumann, Florida Municipal Power Agency, 5, 6, 4, 3; Joe McKinney, Florida Municipal Power Agency, 5, 6, 4, 3; Ken Simmons, Gainesville Regional Utilities, 1, 3, 5; Lynne Mila, City of Clewiston, 4; Randy Hahn, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 5, 6, 4, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Chris Gowder, Group Name FMPA</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes 0

**Response**

**Michael Godbout - Hydro-Qu?bec TransEnergie - 1 - NPCC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**David Greyerbiehl - CMS Energy - Consumers Energy Company - 1,3,4,5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Lauren Price - American Transmission Company, LLC - 1**

**Answer**

Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>David Ramkalawan - Ontario Power Generation Inc. - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes 0

**Response**

**Jamie Monette - Allete - Minnesota Power, Inc. - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Thomas Rafferty - Edison International - Southern California Edison Company - 5**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.

Likes 0

Dislikes 0

**Response**

**Kenya Streeter - Edison International - Southern California Edison Company - 6**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

<b>Answer</b>	
<b>Document Name</b>	Test document.docx
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

**2. Do you agree the technical committees (e.g., Operating Committee, Planning Committee, and Critical Infrastructure Protection Committee) should administer the Field Tests?**

**Barry Lawson - National Rural Electric Cooperative Association - 3,4**

**Answer** No

**Document Name**

**Comment**

As stated above we are concerned about the difference between “oversees” and “conducted” and now this question says the technical committees should “administer” the field test. This new term confuses things even more. As stated above, we believe that this needs to be clarified in this section so that the drafting team and the technical committee clearly understand their roles and responsibilities.

Likes 0

Dislikes 0

**Response**

**Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators**

**Answer** No

**Document Name**

**Comment**

(1) We seek clarification of the reference to Lead NERC Technical Committee in this proposed revision. Does the reference mean the committee collectively, its chairperson, its executive committee, or a simple majority? These committees meet in a formal setting quarterly, and actions related to the field trial may need to be taken more immediately.

(2) Based on this proposal, it appears likely that the NERC Technical Committees will appoint a task force to provide administrative oversight over the initiation, execution, and termination of field trials. Clarification regarding those eligible to participate on these task forces is needed.

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

**Answer** No

**Document Name**

**Comment**

We agree that the appropriate technical committee(s) should have oversight of the field tests however, we have several concerns for them actually administering the test. Our first concern would be applicable to having the appropriate structured process/procedures to developing the test plan. The second concern would be associated with the technical committee(s) having the appropriate resources to conduct the field tests. If their resources are limited, we can only assume a third party entity would be used to conduct the test. The final concern would be if a third party was used, what criteria would the technical committee(s) use to help ensure that the third party is qualified to conduct the field test? The review group would like to see more documentation on how these areas would be addressed.

Likes 0

Dislikes 0

### Response

**Michael Haff - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC**

**Answer** No

**Document Name**

### Comment

Adopt the comments of the National Rural Electric Cooperative Association (NRECA).

Likes 0

Dislikes 0

### Response

**Michelle Amarantos - APS - Arizona Public Service Co. - 1**

**Answer** No

**Document Name**

### Comment

AZPS is unsure that the technical committees would have the needed visibility to know if a field test needed to be terminated for reliability reasons, see section 6.1.2.

Likes 0

Dislikes 0

### Response

**Romel Aquino - Edison International - Southern California Edison Company - 3**

**Answer** Yes

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.

Likes 0

Dislikes 0

**Response**

**Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

As long as the comments mentioned in response to Q1 are addressed, SCE agrees with the field test administration proposals. A technical committee will contain the necessary expertise to conduct or administer the field tests. Accountability to SARs with compulsory field tests will ensure that technical committee field tests are beholden to the collective approval of affected industry segments.

Likes 0

Dislikes 0

**Response**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jamie Monette - Allele - Minnesota Power, Inc. - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**David Ramkalawan - Ontario Power Generation Inc. - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Lauren Price - American Transmission Company, LLC - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**David Greyerbiehl - CMS Energy - Consumers Energy Company - 1,3,4,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Michael Godbout - Hydro-Qu?bec TransEnergie - 1 - NPCC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Chris Gowder - Chris Gowder On Behalf of: Carol Chinn, Florida Municipal Power Agency, 5, 6, 4, 3; David Schumann, Florida Municipal Power Agency, 5, 6, 4, 3; Joe McKinney, Florida Municipal Power Agency, 5, 6, 4, 3; Ken Simmons, Gainesville Regional Utilities, 1, 3, 5; Lynne Mila, City of Clewiston, 4; Randy Hahn, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 5, 6, 4, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Chris Gowder, Group Name FMPA**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 1,3,4,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Chris Scanlon - Exelon - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF**

**Answer**

Yes

**Document Name**

**Comment**

Likes 1

Larry Heckert, N/A, Heckert Larry

Dislikes 0

**Response**

**Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6**

**Answer** Yes

**Document Name**

**Comment**

Likes 2

Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne; Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex

Dislikes 0

**Response**

**Steven Rueckert - Western Electricity Coordinating Council - 10**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Andrew Gallo - Austin Energy - 6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response****John Seelke - LS Power Transmission, LLC - 1****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****John Seelke - LS Power Transmission, LLC - 1****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****John Seelke - LS Power Transmission, LLC - 1****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

**David Kiguel - David Kiguel - 8**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Mark Riley - Associated Electric Cooperative, Inc. - 1, Group Name AECI & Member G&Ts**

**Answer**

**Document Name**

**Comment**

AECI & its member G&Ts support the National Rural Electric Cooperative Association's comments listed below:

As stated above we are concerned about the difference between “oversees” and “conducted” and now this question says the tehcnical committees should “administer” the field test. This new term confuses things even more. As stated above, we believe that this needs to be clarified in this section so that the drafting team and the technical committee clearly understand their roles and responsibilities.

Likes 0

Dislikes 0

**Response**

**Kenya Streeter - Edison International - Southern California Edison Company - 6**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison

Likes 0

Dislikes 0

**Response**

**Thomas Rafferty - Edison International - Southern California Edison Company - 5**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.

Likes 0

Dislikes 0

**Response**

**3. Do you have any other comments concerning Section 6.0 of the SPM?**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

**Document Name**

**Comment**

No.

Likes 0

Dislikes 0

**Response**

**David Kiguel - David Kiguel - 8**

**Answer**

**Document Name**

**Comment**

The Sentence "The drafting team may be supplemented with other individuals based on the required technical expertise needed to support the field test." is ambiguous. While the concept is appropriate, the Manual should provide detail on how individuals are nominated and selected. Suggest to add that NERC Reliability Standards Staff shall identify individuals with the appropriate technical expertise and make a recommendation for approval by the Standards Committee.

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

**Document Name**

**Comment**

No

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

**Document Name**

**Comment**

No.

Likes 0

Dislikes 0

**Response**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6**

**Answer**

**Document Name**

**Comment**

There are grammar issues and typos hidden by the redline.

Likes 2

Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne; Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex

Dislikes 0

**Response**

**Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates**

**Answer**

**Document Name**

**Comment**

See response to Question 1.

Likes 0

Dislikes 0

**Response**

**Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric**

**Answer**

**Document Name**

**Comment**

No

Likes 0

Dislikes 0

**Response**

**Chris Scanlon - Exelon - 1**

**Answer**

<b>Document Name</b>	
<b>Comment</b>	
Propose that the statement in paragraph 2 of section 6.0 “The drafting team may be supplemented with other individuals based on the required technical expertise needed to support the field test” be moved to the second or third bullet in Section 6.1. and that it be clarified that the relevant Technical Committees and Staff identify the additional expert(s) to assign to the team.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
In the Section 6 changes, it states “Proposed Section 6.1.2 provides that the lead NERC technical committee overseeing the field test may stop or modify the field test if it determines that the field test activity poses a reliability risk to the Bulk Power System.”	
What is the role of the host utility in this effort? I would hope that the host and NOT the NERC technical committee has over-riding authority to stop a field test if the host believes reliability is impacted.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
None.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Thomas Rafferty - Edison International - Southern California Edison Company - 5</b>	

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Romel Aquino - Edison International - Southern California Edison Company - 3</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Kenya Streeter - Edison International - Southern California Edison Company - 6</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Lauren Price - American Transmission Company, LLC - 1</b>	
<b>Answer</b>	
<b>Document Name</b>	

**Comment**

None.

Likes 0

Dislikes 0

**Response****Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC****Answer****Document Name****Comment**

It is important to balance the role of the technical committees in field tests and delineate where oversight should begin and delegated authority from the SC should end. The current proposal delegates too much of the SC authority to the NERC technical committees to potentially "streamline" the existing process. The tradeoff between efficiency and due process cannot ignore the significance of segment oversight. It is not sufficient to justify the proposed revisions on the basis that the ballot pool includes the necessary segment representation either. Any SAR which required field tests was approved to ensure prudent standards development. Using ballot pool participation as a justification for delegating more authority to NERC technical committees changes the nature of the SAR without due process.

Likes 0

Dislikes 0

**Response****David Ramkalawan - Ontario Power Generation Inc. - 5****Answer****Document Name****Comment**

In conducting a field test for a technical concept the drafting team may be supplemented with technical experts. The drafting team is responsible for developing the field test plan, including the implementation schedule, and for identifying compliance related issues such as the potential need for compliance waivers.

According to 6.1: Field Tests and Data Analysis - Field tests to validate concepts that support the development of Reliability Standards should be conducted, to the extent possible, before the SAR for a project is finalized.

Please clarify who is responsible for the field test if the SAR for the project has been finalized and there is no SDT for that project.

It is OPG's opinion that the SAR/project should not be concluded before the field tests have been executed with the collected data analyzed/interpreted and required results adequately reflected/implemented in the new standard/revision of the old standard.

Likes 0

Dislikes 0

**Response**

**Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb**

**Answer**

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

**Answer**

**Document Name**

**Comment**

We would like to see more documentation on how NERC Staff and the technical committee(s) plan to implement the waiver process.

Likes 0

Dislikes 0

**Response**

**Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2**

**Answer**

**Document Name**

**Comment**

Please provide clarification on who conducts a field test during the SAR stage if the Standards Committee hasn't appointed an SDT during the SAR stage (which seems possible under section 4.3 of the SPM). Do they have to appoint an SDT for the purpose of the field test? In Section 6.1.1, the 3rd

bullet should be further clarified that the standard drafting team conducting the field test is responsible for updating their respective NERC technical committee.

In Section 6.1.1 – Field Test Approval, revisions currently state that the NERC technical committee will be responsible for “coordinating and communicating status of the results of the field test.” It is unclear to whom the technical committee will communicate status to. The Standards Committee? NERC Staff? The Board? All bodies in general? Later on in section 6.2, it states “Prior to the ballot of any standard involving a field test, the drafting team shall provide to the Standards Committee either a preliminary report of the results of the field test to date, if the field test will continue beyond standard development, or a final report if the field test has been completed.” This is inconsistent with the statement above that the technical committee will be the primary communicator for the status of the project. Who will act as the primary spokesman for the field test? This role should be clarified.

If the NERC Standards Committee does not approve a technical committee’s recommendation, is the SDT and/or technical committee able to resubmit a request for a field test that addresses the NERC SC’s concerns? Section 6 is currently silent on this instance. “ A rejection does not preclude the SDT from engaging in further research on the standard concept or field test plan.” Provide justification for compliance exemption – seek compliance department concurrence.

The changes suggest that the field test could last past the development of a standard. This seems to be inconsistent with the fundamental point of the field test, which is to test a concept for purposes of a possible new standard. Should the field test process be independent of (or a condition to) the standards development process? If it is possible to "pilot" a proposed change to a requirement, wouldn't it be preferable to have the NERC technical committees do this before a new standard is proposed, or at least as part of the SAR process? Please clarify that a field test may not last beyond the development of a standard. – Ben thinks this is clear but it’s not, so he asks we put this comment in our responses.

Please provide clarification on what it means to have the NERC technical committee "oversee" the field test (and to coordinate all entity participation in the test) while at the same time the SDT is supposed to be responsible for "conducting" the field test. What do these different roles mean? Who gets to decide how the test works in the event of a disagreement on process?

Likes 0

Dislikes 0

### Response

**Jamie Monette - Allete - Minnesota Power, Inc. - 1**

**Answer**

**Document Name**

**Comment**

No.

Likes 0

Dislikes 0

<b>Response</b>	
<b>Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name</b> ACES Standards Collaborators	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>(1) A business process diagram identifying the coordination between the NERC Technical Committees, the NERC Standards Committee (SC), and NERC Staff should be included in this section. The proposed language does not accommodate outcomes such as what happens in the event that the Lead NERC Technical Committee rejects the request to oversee the field trial. We also believe NERC Compliance and Enforcement should be involved earlier in the process to determine compliance waivers for currently enforceable Reliability Standards. This should occur before SC approval for the initiation of the field trial.</p> <p>(2) The last sentence of the first paragraph, "Drafting teams are not required to collect and analyze data or to conduct a field test to validate a Reliability Standard," should be removed. We believe the intent of this sentence is already implied within the first sentence of the paragraph.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name</b> Southern Company	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>See Section 6.2. There is a sentence in Section 6.2 that can read somewhat ambiguously as follows: "The NERC Compliance Monitoring and Enforcement Program Staff shall determine whether to approve the requested waivers and shall be responsible for approving any modifications or terminations that may become necessary following the start of the field test." This sentence could be misunderstood to imply that the NERC Compliance Monitoring and Enforcement Program Staff has an approval role in modifications to the field tests, when it is believed, their approval responsibility is restricted only to the waivers.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	

**4. Do you agree with the revisions to Section 7.0 of the SPM?**

**Barry Lawson - National Rural Electric Cooperative Association - 3,4**

**Answer** No

**Document Name**

**Comment**

On page 32 of the redline, Section 7.1, first line, it is confusing to NRECA that a valid interpretation does not “interpret” the language of the requirement. We strongly urge that the word “interpret” not be deleted from this sentence.

On page 32 of the redline, Section 7.2.1, NRECA has the following requests for clarity. In bullet 3 it refers to “an existing or future standard,” but its unclear how far in the future this is referring to. Since some standards can take a number of years to develop, should a request for and interpretation be rejected because something is going to be done in that area in 5 to 8 years from now? There should be some limitation on what “future” means in this context. Maybe “future” means a project that has a SAR submitted that would address the interpretation issue. In bullet 5 NRECA recommends that the term “record” be clarified so that everyone knows what that means, such as the record of draft standards, comments, responses to comments or something along these lines. In bullet 8, the use of “plain on its face” is very subjective and very difficult to challenge. NRECA recommends deleting bullet 8.

On page 32 of the redline, footnote 27, NRECA requests that examples of “applicable NERC Compliance Monitoring and Enforcement Program processes” be added to the footnote.

Likes 0

Dislikes 0

**Response**

**Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators**

**Answer** No

**Document Name**

**Comment**

The use of “Interpretation” and “clarify” are used interchangeably within this section, yet are observed to have clearly different meanings. We recommend revising the language to only use one term for consistency throughout this section.

Likes 0

Dislikes 0

**Response**

**Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2**

**Answer** No

<b>Document Name</b>	
<b>Comment</b>	
See comments for Question #5	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>David Ramkalawan - Ontario Power Generation Inc. - 5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
OPG does not agree with the elimination of the requirement for the Interpretation Drafting Team to respond in writing to each submitted comment. OPG is of the opinion that this can be wrongfully interpreted as the team not having to respond to the comments submitted during the official commenting period. All comments should be dispositioned in some way.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
The review group has a concern that this section uses the terms 'Interpretation' and 'clarify' interchangeably as we understand them to have clearly different meanings. We recommend that staff revise the language to use only one of the terms for consistency throughout this section.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Mark Riley - Associated Electric Cooperative, Inc. - 1, Group Name AECl &amp; Member G&amp;Ts</b>	
<b>Answer</b>	No

<b>Document Name</b>	
<b>Comment</b>	
<p>AECI &amp; its member G&amp;Ts support the National Rural Electric Cooperative Association's comments listed below:</p> <p>On page 32 of the redline, Section 7.1, first line, it is confusing to NRECA that a valid interpretation does not "interpret" the language of the requirement. We strongly urge that the word "interpret" not be deleted from this sentence.</p> <p>On page 32 of the redline, Section 7.2.1, NRECA has the following requests for clarity. In bullet 3 it refers to "an existing or future standard," but its unclear how far in the future this is referring to. Since some standards can take a number of years to develop, should a request for and interpretation be rejected because something is going to be done in that area in 5 to 8 years from now? There should be some limitation on what "future" means in this context. Maybe "future" means a project that has a SAR submitted that would address the interpretation issue. In bullet 5 NRECA recommends that the term "record" be clarified so that everyone knows what that means, such as the record of draft standards, comments, responses to comments or something along these lines. In bullet 8, the use of "plain on its face" is very subjective and very difficult to challenge. NRECA recommends deleting bullet 8.</p> <p>On page 32 of the redline, footnote 27, NRECA requests that examples of "applicable NERC Compliance Monitoring and Enforcement Program processes" be added to the footnote.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p><b>Michael Haff - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC</b></p>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>Adopt the comments of the National Rural Electric Cooperative Association (NRECA).</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p><b>Chris Gowder - Chris Gowder On Behalf of: Carol Chinn, Florida Municipal Power Agency, 5, 6, 4, 3; David Schumann, Florida Municipal Power Agency, 5, 6, 4, 3; Joe McKinney, Florida Municipal Power Agency, 5, 6, 4, 3; Ken Simmons, Gainesville Regional Utilities, 1, 3, 5; Lynne Mila, City of Clewiston, 4; Randy Hahn, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 5, 6, 4, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Chris Gowder, Group Name FMPPA</b></p>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	

Improvements have been made, but there remains too much ambiguity and latitude for the Interpretation process to be practically implemented. The following are areas where clarity is needed.

While it is valid to look to the development record of a Standard to determine whether an Interpretation is needed (4th bullet under Section 7.2.1), some discussion of what constitutes the “record” is needed so there is a common understanding.

The 5th bullet under Section 7.2.1 conflicts with Section 7.3. How can a request be rejected because it identifies an issue requiring a Standard modification, but also have an Interpretation drafting team identifying deficiencies and submitting SARs? The last paragraph of Section 7 recognizes that an Interpretation can stand in the gap until a Standard can be revised.

Section 7.1 says an Interpretation may not “alter” the scope of a Standard, but the 6th bullet under Section 7.2.1 only allows for rejection if the request seeks to “expand” the scope.

The 7th bullet under Section 7.2.1 is too subjective and open-ended. The fact that an Interpretation request was submitted means that it is not plain on its face to someone. Instead NERC Staff and the requestor should discuss and attempt to come to an understanding of the meaning, which may result in the modification or withdrawal of the request. If confusion remains, then an Interpretation drafting team and/or the ballot pool should determine (per Section 7.3) whether an Interpretation is needed, not NERC Staff or the SC.

In addition to these clarifications, timetables for action should be added to the process. As it stands, there is no limit to the amount of time NERC Staff can take to determine the validity of an Interpretation request. A reasonable limitation (something less than 90 days) is needed so that requests do not linger without action.

Likes 0

Dislikes 0

### Response

**Michael Godbout - Hydro-Qu?bec TransEnergie - 1 - NPCC**

**Answer**

No

**Document Name**

**Comment**

Please see our answer to the next question.

Likes 0

Dislikes 0

### Response

**Michelle Amarantos - APS - Arizona Public Service Co. - 1**

**Answer**

No

**Document Name**

**Comment**

In section 7.1, please define the “scope of a requirement.”

Step 2 on page 35 should be updated to reflect previous edits regarding NERC staff.

Likes 0

Dislikes 0

### Response

**Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF**

Answer

No

Document Name

### Comment

The first bullet of Section 7.3 states that the “NERC Reliability Standards staff shall review the draft Interpretation and to provide a recommendation to the Standards Committee...”. Then once the Interpretation has passed ballot, on the top of page 34 it states, “If approved by the ballot pool, NERC Staff shall review the final Interpretation...”. This is the same language in two different places. Recommend that the latter language be remove.

Likes 1

Larry Heckert, N/A, Heckert Larry

Dislikes 0

### Response

**Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates**

Answer

No

Document Name

### Comment

The revision in proposed Section 7.2.1 (Rejection of an Interpretation Request) that allows a request for Interpretation to be rejected if an “existing or future standard development project” can address the issue effectively allows for an indefinite delay in NERC responding to *Request for Interpretation*. Any issue could arguably be addressed by a “future standard development project” and a request for an interpretation on that issue could be rejected on that basis. As such, it is overly broad and subjective. We suggest removing “or future” to ensure the issue is not arbitrarily delayed. The suggested language for the second bullet in Section 7.2.1 is as follows: “Where the issue can be addressed by incorporating the issue into an existing standard development project.”

Likes 0

Dislikes 0

### Response

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>Section 7.2 needs to be clarified. While the revised section makes reference back to Section 4.0, the revised 7.2 also includes exceptions to the drafting process. From our reading of the revised language, it is unclear whether or not the drafting team will have to reply to stakeholder comments in writing. We believe the intent is to have the drafting team only respond to comments in written form during the official comment period, which is acceptable. However we are concerned that the proposed revised language could be read to mean that the drafting team does not have to reply to comments at all. We recommend that Section 7.2 explicitly state that written responses will be provided to comments received during the official comment period for new interpretations.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Daniel Grinkevich - Con Ed - Consolidated Edison Co. of New York - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>Section 7.2 needs to be clarified. While the revised section makes reference back to Section 4.0, the revised 7.2 also includes exceptions to the drafting process. From our reading of the revised language, it is unclear whether or not the drafting team will have to reply to stakeholder comments in writing. We believe the intent is to have the drafting team only respond to comments in written form during the official comment period, which is acceptable. However we are concerned that the proposed revised language could be read to mean that the drafting team does not have to reply to comments at all. We recommend that Section 7.2 explicitly state that written responses will be provided to comments received during the official comment period for new interpretations.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Thomas Foltz - AEP - 5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>Section 7.1: While AEP does not object to removing the word “interpret” from this section so that it reads “An Interpretation may only clarify the language of the Requirement(s)”, we believe it would be preferable to replace the word with more explanatory text rather than simply</p>	

deleting it. We suggest changing it to instead state “An Interpretation may only clarify or explain the meaning of the language of the Requirement(s)...”

Likes 0

Dislikes 0

### Response

#### LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6

Answer

No

Document Name

### Comment

In Section 7.2.1: "Rejection of an Interpretation Request", the second bullet states "Where the issue can be addressed by incorporating the issue into an existing or future standard development project...". This bullet requires all interpretation requests to be rejected since every issue can be addressed in an existing **or future** standard development project.

Further, it precludes clarification of an existing standard if a new standard is being developed. Considering the uncertain, and often lengthy, time needed to approve a new standard and make it effective, it seems inappropriate to preclude making a needed clarification that would allow everyone to interpret an existing requirement similarly.

Likes 1

Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex

Dislikes 0

### Response

#### Andrew Gallo - Austin Energy - 6

Answer

No

Document Name

### Comment

In Section 7.2.1, the second bullet should be removed ("The issue can be addressed by incorporating it into an existing or planned standard development project") because **any** request could be incorporated into a future project, which means the Standards Committee could use this reason to deny **all** requests for interpretation.

Likes 0

Dislikes 0

### Response

**John Seelke - LS Power Transmission, LLC - 1****Answer** No**Document Name****Comment**

see response to Q6.

Likes 0

Dislikes 0

**Response****John Seelke - LS Power Transmission, LLC - 1****Answer** No**Document Name****Comment**

See the response in Q6,

Likes 0

Dislikes 0

**Response****John Seelke - LS Power Transmission, LLC - 1****Answer** No**Document Name****Comment**

See response to Q6.

Likes 0

Dislikes 0

**Response****Romel Aquino - Edison International - Southern California Edison Company - 3****Answer** Yes

<b>Document Name</b>	
<b>Comment</b>	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Section 7 language and proposed revisions seem to point to the need for the Section and corresponding process to be called "Process for Developing 'Clarification of Reliability Standard Requirements.'"	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Steven Rueckert - Western Electricity Coordinating Council - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>However, if you consider any additional revisions to the SPM, based on comments received, I suggest the following.</p> <p>In section 7.2.1 add "or attachments referenced in a Requirement" to the end of the third bullet. This is consistent with the language in section 7.1.</p> <p>In section 7.3, second paragraph from the bottom, it states that "if approved by the ballot pool, NERC Staff shall review the final Interpretation to determine whether it has met the requirements for a valid Interpretation." This is also done in the first bullet of section 7.3, when the draft Interpretation is developed by the Interpretation drafting team. It seems like after the Interpretation is approved by the ballot pool it is a bit late to be deciding if it is valid. Seems like the only place this determination should be made is in the first bullet when the draft is developed, not after it has been balloted. If you make this change, the flow chart will need to be revised also.</p> <p>In section 7.3, second paragraph after the bullets it states that if the Interpretation drafting team identifies a reliability-related deficiency, it "may" submit a SAR. In the flowchart it says "shall." Suggest revising one or the other for consistency.</p>	
Likes 0	

Dislikes 0

**Response**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jamie Monette - Allete - Minnesota Power, Inc. - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lauren Price - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Greyerbiehl - CMS Energy - Consumers Energy Company - 1,3,4,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

**Response**

**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 1,3,4,5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Chris Scanlon - Exelon - 1****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****David Kiguel - David Kiguel - 8****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Kenya Streeter - Edison International - Southern California Edison Company - 6****Answer****Document Name****Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison

Likes 0

Dislikes 0

**Response**

**Thomas Rafferty - Edison International - Southern California Edison Company - 5**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

**Document Name**

**Comment**

See response to Q6.

Likes 0

Dislikes 0

**Response**

**5. Do you agree with the proposed process for posting and balloting Interpretations?**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer** No

**Document Name**

**Comment**

See response to Q6.

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer** No

**Document Name**

**Comment**

See the response in Q6.

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer** No

**Document Name**

**Comment**

See response to Q6.

Likes 0

Dislikes 0

**Response**

**LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6**

**Answer** No

**Document Name**

**Comment**

Comment and balloting provisions are acceptable.

However, the paragraph that now begins "If approved by the ballot pool, NERC Staff shall review the final Interpretation to determine whether it has met the requirements for a valid Interpretation and shall make a recommendation ..." is redundant since this staff made such a determination before allowing the Interpretation to go for comment and ballot.

Further, there is de minimis value in the NERC Staff making a recommendation to the NERC Board of Trustees after industry balloting has approved the Interpretation.

I suggest removing the entire paragraph (i.e sentence). If that is not acceptable, at least the sentence should be modified to read "If approved by the ballot pool, NERC Staff shall make a recommendation ..."

Likes 1 Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex

Dislikes 0

**Response**

**Thomas Foltz - AEP - 5**

**Answer** No

**Document Name**

**Comment**

Section 7.3:

While Interpretations do not of themselves "create new compliance obligations", they may still be either fairly complex or nuanced at times. As a result, industry should be afforded a more reasonable opportunity to respond by retaining the existing 45 day provision. This will allow industry to develop and provide more meaningful input.

In addition, AEP seeks clarity on how it is possible for a formal comment period to be seemingly eliminated from the entire Interpretation process. Also, given that there is a ballot that accompanies the informal comment period, what does that perhaps imply about the formality of the ballot itself?

Likes 0

Dislikes 0

**Response**

**Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates**

**Answer** No

<b>Document Name</b>	
<b>Comment</b>	
<p>The proposed process in Section 7.3 (Development of an Interpretation) contemplates that the NERC Reliability Standards staff will review the draft Interpretation and provide a recommendation to the Standards Committee whether to authorize posting or remand to the Interpretation drafting team for further work. The Standards Committee is not bound by the recommendation of the NERC staff, and could post the draft Interpretation for comment and ballot despite NERC staff's recommendation to the contrary. Since it would be informative for industry to understand NERC Reliability Standard staff's opinion on a potential Interpretation, particularly if there is a difference of opinion between the Standards Committee and NERC Reliability Standards staff, our recommendation is that both the draft Interpretation and NERC staff's recommendation be provided, so that industry can provide its comments appropriately in conjunction with the balloting. Additionally, the first bullet and the second to last paragraph in Section 7.3 reference "requirements for a valid Interpretation". If the intent is for NERC staff to determine whether the draft Interpretation has met the "requirements for a valid Interpretation", please define these requirements in Section 7.1 (Valid Interpretation).</p>	

Likes	0
Dislikes	0

**Response**

**Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC**

<b>Answer</b>	No
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<b>Document Name</b>	
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**Comment**

The first paragraph of page 34 and former Step 9 (proposed Step 8) unclearly define which NERC staff members are responsible for determining whether an interpretation has met validity requirements. The proposed ambiguity removes what was once clear. The current version requires those responsible for Reliability Standards and those with legal expertise to validate an interpretation. The proposed language should be modified to ensure that proper review is provided by necessary expertise and not ambiguously from any NERC staff member.

Likes	0
Dislikes	0

**Response**

**Michael Godbout - Hydro-Quebec TransEnergie - 1 - NPCC**

<b>Answer</b>	No
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<b>Document Name</b>	
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**Comment**

Section 7.3 is vague regarding the comments and vote. We read the proposed text as never requiring the interpretation drafting team to reply to the comments submitted during the comment period. Also, the overlap in time between the comment period and the ballot is potentially confusing – what would happen if an important comment is submitted after votes have begun? Finally, the section does not cover all possible outcomes of the comments and ballots, in particular, the reception of a comment that proposes a meaningful change to the interpretation.

NPCC has proposed, in its comments to section 7.0, that the interpretation drafting team should reply to comments. We support that comment.

If, however, the intention of this proposed text was to lighten the interpretation process by not requiring replies to comments, we also propose the following text for consideration :

"Interpretations shall be posted for a 30-day informal comment period.

o The NERC Reliability Standards Staff shall establish a ballot pool during the 30-day informal comment period..

o The ballot window shall take place during the 10 calendar days following the 30-day informal comment period.

o Final Ballots shall not be conducted for Interpretations. An Interpretation shall be deemed approved by the ballot pool following the first ballot in which the necessary quorum and sufficient affirmative votes are obtained.

If comments submitted are substantive and require a modification of the interpretation, the interpretation drafting team can suspend the ballot, modify the proposed text of the interpretation and post them again in a new 30-day informal comment period.

If the ballot fails, the interpretation drafting team can modify the proposed text of the interpretation and post them again in a new 30-day informal comment period followed by a new ballot.

If the ballot results indicate that there is not a consensus for the Interpretation or the Interpretation drafting team cannot revise the Interpretation following one or more substantive comments without violating ..."

Likes 0

Dislikes 0

### Response

**Michael Haff - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC**

**Answer**

No

**Document Name**

**Comment**

Adopt the comments of the National Rural Electric Cooperative Association (NRECA).

Likes 0

Dislikes 0

### Response

**Romel Aquino - Edison International - Southern California Edison Company - 3**

**Answer**

No

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.

Likes 0

Dislikes 0

**Response****Mark Riley - Associated Electric Cooperative, Inc. - 1, Group Name AECI & Member G&Ts**

**Answer**

No

**Document Name**

**Comment**

AECI & its member G&Ts support the National Rural Electric Cooperative Association's comments listed below:

NRECA strongly supports deleting the new exceptions (on page 33, Section 7.3, third solid bullet and the four added sub-bullets) for how interpretations should be balloted. We believe interpretations should be balloted in the same manner as reliability standards.

Likes 0

Dislikes 0

**Response****David Ramkalawan - Ontario Power Generation Inc. - 5**

**Answer**

No

**Document Name**

**Comment**

OPG is of the opinion that all substantive changes to the interpretation must be reviewed and balloted by the ballot pool members, regardless of where in the process it occurs i.e. initial or additional ballot (which may be the final ballot).

Likes 0

Dislikes 0

**Response****Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2**

**Answer**

No

**Document Name**

## Comment

1.) The first subsection does not describe a “VALID Interpretation” as much as it describes the “SCOPE of an Interpretation”. If NERC retains the heading “Valid Interpretation” then technically the first reference should be to “Valid Interpretation” and not simply to “an Interpretation” (which would beg the question is this section about the submitted request or to the final result. For parallelism use the phrase “an Interpretation” (and not mix with of “the Interpretation”) also use “referenced attachment” (and not mix with “attachment referenced in the Requirement”). Keep terminology consistent.

Proposed by SRC

### **7.1 Scope of an Interpretation**

An Interpretation may only clarify the “MEANING OR INTENT OF THE” language of the Requirement(s) of an approved Reliability Standard, including, if applicable, any REFERENCED attachment. “AN” Interpretation may not alter the scope or the “WORDS{C}[A1]{C}” of a Requirement or referenced attachment. No other elements of an approved Reliability Standard are subject to an Interpretation.

2.) The next subsection introduces the involvement of NERC staff. The first reference is to “NERC Reliability Standards and Legal Staff”. The proposal then uses the abbreviated reference of “Staff” to mean “NERC Reliability Standards and Legal Staff”. That intent to use Staff as an abbreviation should be made clear, i.e. use “NERC Reliability Standards and Legal Staff (NERC Staff).

The first sentence uses the term “the Interpretation” as if there were only one Interpretation – suggest changing “the” to “an”. This would also comport with the wording NERC proposed in the previous subsection.

It seems that the words “a request for Interpretation” (using an upper case I) indicates a new product, i.e something different from the product in the previous subsection.

The SRC notes that in this subsection, everything starts with NERC Staff (they get the request, they decide on the validity and then make recommendations to the SC.)

Proposed by SRC

### **“7.2 NERC Staff Process and Procedures**

the entity requesting “AN” Interpretation shall submit a *Request for Interpretation* form to the NERC Reliability Standards Staff “(NERC STAFF)” explaining the clarification required, the specific circumstances surrounding the request, and the impact of not having the Interpretation provided. “NERC STAFF” shall review the request for Interpretation to determine whether the request meets the requirements for a valid Interpretation. Based on this review, NERC Staff shall make a recommendation to the Standards Committee whether to accept the “REQUEST FOR INTERPRETATION.”

3.) It seems that there needs to be some description of steps involved with going from a NERC Staff recommendation to an SC decision on whether or not to go forward. Of course the implication in the proposed draft is that the SC will do what it is told to do, but the “Process” should allow for some SC independence that allows the SC to consider and not simply rubber-stamp the NERC staff recommendations – otherwise why have the SC get involved at all? The proposed Section 7.2.2 merely states the steps the SC would take upon approval of a request. The SRC proposes to place those steps into the following new section (and delete 7.2.2).

**Proposed by SRC**

“7.X Standards Committee Process and Procedures

The Standards Committee (SC) Chair upon receipt of NERC Staff recommendations concerning whether to accept a Request for Interpretation shall:

- Distribute to the SC copies of the Request for Interpretation and a copy of the NERC Staff recommendations
- Include for discussion and vote the Request for Interpretation on an SC Agenda (within 180 days of receipt of the NERC Staff recommendations)
- Authorize NERC Staff to assemble an Interpretation Drafting Team if the Request for Interpretation were accepted (see Section 7.3 Development of an Interpretation). The SC shall authorize:
  - o Development of an Interpretation that will be posted for formal comment and ballot (as per ..... )
- Inform the author of the Request for Interpretation if the Request for Interpretation were not accepted

The SC members shall decide on whether to accept the Request for Interpretation based on the criteria established in Section 7.2.1.” Is it implied that actual words can never be changed? After all this is an interpretation – not a SAR.

Likes	0
Dislikes	0
<b>Response</b>	
<b>Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	

The current approach using the addition of calendar days does not recognize Federal holidays or the possibility of office closures and scheduled vacations. Historically, there has been a push to address commenting periods before the end of the year, and a 30-day commenting period during the months of November and December are burdensome. We concur that a minimum 30-day period is ample time for commenting on an interpretation, with the condition that the commenting period ends on the first business day following a specific calendar date of each month, such as the 15th. For example, a posting for comment on May 1st would therefore end on June 15th.

Likes 0

Dislikes 0

### Response

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer**

No

**Document Name**

### Comment

Section 7.3, page 33: The updates to this section do not clearly explain the process for when an initial informal ballot does not pass, and the IDT does have the ability to make modifications to the Interpretation. Does the IDT have the option of posting the updated Interpretation for a 2nd informal or final ballot period? Is the only option in that case to have the SC submit a SAR for a potential future modification to the applicable Reliability Standard? If the IDT is not allowed to post an updated Interpretation for a 2nd informal comment/ballot period based on comments received in the initial ballot, what purpose does it serve to collect comments in the initial informal ballot if they cannot be incorporated into the Interpretation and the updates be voted on?

Likes 0

Dislikes 0

### Response

**Barry Lawson - National Rural Electric Cooperative Association - 3,4**

**Answer**

No

**Document Name**

### Comment

NRECA strongly supports deleting the new exceptions (on page 33, Section 7.3, third solid bullet and the four added sub-bullets) for how interpretations should be balloted. We believe interpretations should be balloted in the same manner as reliability standards as they are currently described in the SPM.

Likes 0

Dislikes 0

### Response

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Chris Scanlon - Exelon - 1**

**Answer** Yes

**Document Name**

**Comment**

With clarification, see below.

Likes 0

Dislikes 0

**Response**

**Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF**

**Answer** Yes

**Document Name**

**Comment**

We agree if our proposed changes are incorporated into the SPM.

Likes 0

Dislikes 0

**Response**

**Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Dominion suggests requiring the IDT to respond to comments even though the comment period is an informal one.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>David Kiguel - David Kiguel - 8</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Andrew Gallo - Austin Energy - 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Steven Rueckert - Western Electricity Coordinating Council - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Likes 0

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Michelle Amarantos - APS - Arizona Public Service Co. - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Karl Blaszkowski - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
David Greyerbiehl - CMS Energy - Consumers Energy Company - 1,3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

**Response**

**Chris Gowder - Chris Gowder On Behalf of: Carol Chinn, Florida Municipal Power Agency, 5, 6, 4, 3; David Schumann, Florida Municipal Power Agency, 5, 6, 4, 3; Joe McKinney, Florida Municipal Power Agency, 5, 6, 4, 3; Ken Simmons, Gainesville Regional Utilities, 1, 3, 5; Lynne Mila, City of Clewiston, 4; Randy Hahn, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 5, 6, 4, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Chris Gowder, Group Name FMFA**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Lauren Price - American Transmission Company, LLC - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jamie Monette - Allete - Minnesota Power, Inc. - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

**Document Name**

**Comment**

See response to Q6.

Likes 0

Dislikes 0

**Response**

**Thomas Rafferty - Edison International - Southern California Edison Company - 5**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.

Likes 0

Dislikes 0

**Response**

**Kenya Streeter - Edison International - Southern California Edison Company - 6**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison

Likes 0

Dislikes 0

**Response**

**6. Do you have any other comments concerning Section 7.0 of the SPM?**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer**

**Document Name**

**Comment**

No.

Likes 0

Dislikes 0

**Response**

**Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators**

**Answer**

**Document Name**

**Comment**

We believe a request for interpretation to clarify a standard effective date and/or applicability should not be rejected. Ambiguities in effective dates and applicability render a Standard potentially unenforceable, and most certainly limit the desired effect on reliability. We see no other effective mechanism in place to resolve these ambiguities. Support documentation, as outlined in Section 11 of the proposed document, only explains or facilitates the understanding of Reliability Requirements. The other approach currently available to Registered Entities - to follow up with their Regional Entity for clarification - is not only cumbersome, it results in inconsistencies between Regions as well as potential risks to the BES as a result of confusion over effective dates and applicability of a Standard.. We recommend removing the reference entirely from the list in Section 7.2.1.

Likes 0

Dislikes 0

**Response**

**Jamie Monette - Allete - Minnesota Power, Inc. - 1**

**Answer**

**Document Name**

**Comment**

No

Likes 0

Dislikes 0

## Response

Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2

Answer

Document Name

Comment

1.) The document should be consistent in its references. Use “*Request for Interpretation*” or “*request*” but not both (unless the document makes clear that the term “*Request*” is an abbreviation of “*Request for Interpretation*”). NERC staff in its Alignment of Terms has pushed using “verbs” following bullets. See below.

### Proposed by SRC

#### “7.2.1: Criteria for Acceptance of a Request for Interpretation

A *Request for Interpretation* may be accepted where the meaning of a Reliability Standard is not plain on its face or the *Request for Interpretation* seeks clarity on:

- Requirement wording that is unclear to NERC Staff (..... The entity making this decision is open for SDT discussion .....
- A requirement term is used in different ways in multiple contexts
- A requirement term or issue that has evolved or changed meaning

#### 7.2.2: Criteria for Rejection of a Request for Interpretation

A *Request for Interpretation* may be rejected where the meaning of a Reliability Standard is plain on its face or the *Request for Interpretation*:

• Seeks approval of a specific compliance approach

• Can be addressed by incorporating the issue into an existing or pending standard or pending Project

• Seeks clarification of any element of a Reliability Standard other than a Requirement.

• Has already been addressed in the record.;

• Proposes the development of a new or modified Reliability Standard

• Seeks to expand the scope of a Reliability Standard”

2.) The NERC proposed changes makes a distinction between a *Request for Interpretation* and the Interpretation for comment and balloting. The SRC proposes that the same words not be used for both purposes. The burden for submitting a SAR should not rest solely on the interpretation team.

**Proposed by SRC:**

**“7.3: Development of an Interpretation for Comment and Ballot**

Within 180 days following the Standards Committee’s request for NERC staff to assemble an Interpretation Drafting Team, NERC staff shall empower an Interpretation Team to draft an Interpretation consistent with Section 7.1 for formal comment and ballot

7.3.1 Draft Interpretation Processing

NERC Staff shall review the Interpretation Team’s draft proposal to ensure the draft is consistent with Sections 7.1, 7..... and submit the NERC Staff’s review and recommendations to the Standards Committee

The Standards Committee shall review the Interpretation Drafting Team’s draft Interpretation as well as the NERC Staff’s review and recommendations. The Standards Committee shall:

- o Authorize the posting of the draft Interpretation for comment and ballot, or
- o Reject the draft Interpretation (ending the process), or
- o Remand the draft back to the Interpretation Team with suggested changes and a new round of review

A Standards Committee authorized draft shall be balloted in the same manner as Reliability Standards (see Section 4.0), with the following exceptions:

- Interpretations shall be posted for a 30-day informal comment period. The Interpretation drafting team is not required to respond in writing to comments submitted during this comment period.
- The NERC Reliability Standards Staff shall establish a ballot pool during the first 20 days of the 30-day informal comment period.
- The ballot window shall take place during the last 10 calendar days of the 30-day informal comment period.
- Final Ballots shall not be conducted for Interpretations. An Interpretation shall be deemed approved by the ballot pool following the first ballot in which the necessary quorum and sufficient affirmative votes are obtained.

If ballot results indicate that there is not a consensus for the Interpretation, and the Interpretation drafting team cannot revise the Interpretation without violating the criteria for what constitutes a valid Interpretation (see Section 7.1), the Interpretation drafting team shall notify the Standards Committee of its conclusion and may submit a SAR with the proposed modification to the Reliability Standard.”

Likes 0

Dislikes 0

**Response**

**Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb**

**Answer**

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**David Ramkalawan - Ontario Power Generation Inc. - 5**

**Answer**

**Document Name**

**Comment**

OPG is concerned that the newly proposed reduction to 30 calendar days from the 45-day formal comment period could result in the reduction of the level of effort and the quality of the reviews.

OPG does not agree with the 7.2.1 Rejection of an Interpretation Request, based on the following explanation: "Where the issue can be addressed by incorporating the issue into an existing or future standard development project.". A time commitment should be considered and stated before rejecting the request, in other words the Interpretation Request is not being rejected outright by simply being postponed to a more appropriate time.

Likes 0

Dislikes 0

**Response**

**Lauren Price - American Transmission Company, LLC - 1**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Kenya Streeter - Edison International - Southern California Edison Company - 6**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison

Likes 0

Dislikes 0

**Response**

**Romel Aquino - Edison International - Southern California Edison Company - 3**

**Answer**

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**Thomas Rafferty - Edison International - Southern California Edison Company - 5**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.

Likes 0

Dislikes 0

**Response**

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer**

**Document Name**

**Comment**

In Footnote 27, the reference to the CMEP process is vague. Is this in reference to the Compliance Guidance Policy?

Duke Energy agrees with the comments submitted by LS Power Transmission regarding the broadening of the scope of Requests for Interpretations to also include questions regarding "Applicability" and "Effective Date".

Likes 0

Dislikes 0

**Response**

**Michael Godbout - Hydro-Quebec TransEnergie - 1 - NPCC**

**Answer**

**Document Name**

**Comment**

We support NPCC's comment that the interpretation process can be opened to other sections of the standard. Requirements are central to the standards development process. Other sections are usually reviewed more quickly and have historically had more errors or ambiguities. Allowing the submission of requests for interpretation of these sections would provide a channel for submitting these problems to NERC and potentially addressing them through an interpretation or an errata filing.

We note that the proposed modifications clarify the interpretation process, but also narrow its scope slightly. We support broadening the scope because the interpretation process is currently the only relatively lightweight formal process to resolve ambiguities in standards.

Likes 0

Dislikes 0

**Response**

**James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5**

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
None.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Chris Scanlon - Exelon - 1</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
7.21 bullet 3. Reject an interpretaion when “an the issue can be addressed by incorporating the issue into an active existing or future standard drafting team development project”	
Propose this be clarified as existing Projects or standards included in Projects identified in a Board approved RSDP.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
No	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF</b>	

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
N/A	
Likes 0	
Dislikes 0	
<b>Response</b>	
Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>Figure 2 (Process for Developing an Interpretation) is not referenced in the text of Section 7. It may be beneficial to remove Figure 2 entirely to ensure there are no discrepancies between the words of Section 7 and the figure. Likewise, numbering the steps directly in Section 7 may be beneficial and have the same effect as the figure.</p> <p>Section 7.1 (Valid Interpretation) refers to documents which are attached to a standard as “attachment[s]”. It seems that any “attachment” to a Reliability Standard would be classified as a “Supporting Document” as described in Section 11 and this Section 7.1 should refer to a “Supporting Document” in lieu of an “attachment”.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thomas Foltz - AEP - 5	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>AEP’s negative votes are primarily driven by our objections to reducing the turnaround time to less than 45 days for comment periods associated with Interpretations and Supporting Documentation.</p>	
Likes 0	
Dislikes 0	

**Response**

**LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6**

**Answer**

**Document Name**

**Comment**

No

Likes 2

Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex; Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne

Dislikes 0

**Response**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

**Document Name**

LS Power Transmission comments re proposed Section 7.0 changes.docx

**Comment**

Due to SBS formatting limitations, separate comments are attached.

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

**Document Name**

LS Power Transmission comments re proposed Section 7.0 changes.docx

**Comment**

Due to SBS formatting limitations, comments are attached

Likes 0

Dislikes 0

**Response**

**David Kiguel - David Kiguel - 8**

**Answer**

**Document Name**

**Comment**

Suggest changing Section 7.2.2 to: "If the Standards Committee accepts the Interpretation request, the Standards Committee shall authorize NERC Reliability Standards Staff to identify individuals with the relevant expertise and recommend the composition of an Interpretation drafting team to address the request, for approval by the Standards Committee." The SC should ultimately approve the team membership.

Section 7.3 proposes that, if approved by the ballot pool, staff shall review the final Interpretation to determine whether it has met the requirements for a valid Interpretation before recommending adoption by the BoT. A mechanism should be provided to perform such review before the interpretation being balloted. If the draft does not meet the requirement for valid interpretation, it should not reach the balloting stage.

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

**Document Name**

LS Power Transmission comments re proposed Section 7.0 changes.docx

**Comment**

Due to SBS formatting limitations, separate comments are attached.

Likes 0

Dislikes 0

**Response**



7. Do you agree with the revisions to Section 11.0 of the SPM?

John Seelke - LS Power Transmission, LLC - 1

Answer No

Document Name

Comment

While LSPT understands that this section is intended to be limited to technical documents, that limitation is not made clear. Therefore, LSPT recommends that the word "technical" be inserted in the Section 11 heading – "Process for Approving Supporting *Technical* Documents." "Technical" should also be included in the first sentence, which LSPT recommends modifying as follows: "The NERC Standards Committee oversees the development and approval of *technical* documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority."

Likes 0

Dislikes 0

Response

LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6

Answer No

Document Name

Comment

Section 11.2 provides absolute veto power by NERC Staff regarding whether a document meets the numbered bullet items (1 - 3), thereby meeting requirements of a Supporting Document. There must be some means of appealing the decision of NERC Staff in this regard.

Perhaps, a Stakeholder proposing a supporting document that is unable or unwilling to address NERC Staff concerns could provide rationale for why he/she believes the document meets stated requirements to an appropriate technical committee or directly to the Standards Committee. This appeal process should require good faith efforts to address staff concerns, but if concerns remain unresolved, provide impartial representation and hearing in whatever the selected appellate forum by both the stakeholder and NERC Staff.

Likes 2

Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex; Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne

Dislikes 0

Response

Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF

Answer No

Document Name

Comment

In the last paragraph of Section 11.1, it states, "Supporting documents do not include documents that contain specific compliance approaches or examples of compliance. Such documents would be developed in accordance with the applicable NERC Compliance Monitoring and Enforcement Program process". This statement is contrary to examples of evidence as in CIP-003-6, Attachment 2, as an example. We believe that complying with a NERC Standard should be as easy as possible for the responsible entity. The ERO (and its delegated parties) should make every attempt to assure that examples of what compliance MAY look like every chance they get. If the SPM calls it a "Reference" then fine, everything can be called a "reference". The Standard is there to support the Reliability of the BPS, not a compliance catch to see if the entity understands how to comply with a Standard.

Likes 0

Dislikes 0

### Response

**Michael Haff - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC**

**Answer**

No

**Document Name**

**Comment**

Adopt the comments of the National Rural Electric Cooperative Association (NRECA).

Likes 0

Dislikes 0

### Response

**Mark Riley - Associated Electric Cooperative, Inc. - 1, Group Name AECl & Member G&Ts**

**Answer**

No

**Document Name**

**Comment**

AECl & its member G&Ts support the National Rural Electric Cooperative Association's comments listed below:

In Section 11.2, NRECA strongly recommends that a time limit be added for how long NERC Reliability Standards Staff has to evaluate a supporting document. Without a time limit requirement, there is no incentive for NERC Reliability Standards Staff to act on the request. NRECA recommends that a 120 day time limit requirement be added for NERC staff to complete and announce publicly to the Standards Committee whether a supporting document has met the three criteria. Additionally, NERC staff should notify the requester within 10 days, after finishing their 120 day evaluation, what the next steps are as proposed in the paragraphs after the three criteria in Section 11.2.

Likes 0

Dislikes 0

### Response

**Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb**

**Answer**

No

**Document Name**

**Comment**

Industry relies on the Guidance and Technical Basis supporting documents—and the information they provide—to affirm the intent of the SDT and provide a basis for the standards and requirements which are posted for ballot.

At the time a Standard is enforceable, the guidance document's authority and value is not universally accepted in the same light by entities and the ERO. The authority of the document and information entities' relied upon in evaluating the proposed Standard, inform their vote, and guide implementation of the Standard, is inconsistently recognized by the ERO in compliance and enforcement matters.

The changes to Section 11 work to remedy this issue and provide a process based approach for supporting documentation; however, the revision language falls short by not affirmatively recognizing the weight and authority the supporting documents carry in a standard's balloting process and in strengthening BPS reliability and security.

Likes 0

Dislikes 0

**Response**

**Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2**

**Answer**

No

**Document Name**

**Comment**

See comments for Question #8

Likes 0

Dislikes 0

**Response**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer**

No

**Document Name**

**Comment**

(a) The revised Section 11.0 seems to only contemplate new, prospective Supporting Documents yet to be developed. The Section does not address how an existing document would be treated in the NERC Reliability Standards Development Process if, for example, updates were required to harmonize the document with a revised version of a Reliability Standard. Standard Drafting Teams should have the discretion to make administrative or substantive revisions to existing documents as necessary. To remedy this concern, the SPM should include language affirming the Standard Drafting Team's ability to make such changes. Additionally, existing documents should be exempt from any new procedure whenever conforming/harmonizing revisions become necessary.

(b) The table, 11.1: Types of Supporting Documents, deletes the following titles and descriptions from the SPM: "Guideline", "Supplement", "Training Material", and "Procedure". Many SDTs develop "Guidelines and Technical Basis" documents as supplements to Reliability Standards. These supplements are very helpful in explaining the rationale behind new/modified requirements and in determining how best to implement new/modified requirements. With the removal of Guidelines from the SPM, will these documents now be separate from the Standards Development Process, or will they continue to be developed as "Reference" documents? Also, does this proposed revision alter the disposition of existing documents already vetted under the RSDP? It is not clear how the SPM treats existing documents. The SC and SCPS should clarify if existing documents are beyond the scope of this SPM revision or if they must be revised to conform to one of the three remaining or proposed "types" of Supporting Document - namely, "Reference", "Lessons Learned", or "White Paper" - in the event this proposal is approved.

(c) Proposed subsection 11.2: Process for Proposing and Evaluating Supporting Document provides three criteria for NERC Staff's review. The first criteria is based on the "type of supporting document subject to this Section". If taken literally, Table 11.1 will limit any submittal to one of three types - Reference, Lessons Learned, and White Paper. NERC should clarify if the limitation to one of three types of document was the desired intent.

Likes 0

Dislikes 0

### Response

#### Barry Lawson - National Rural Electric Cooperative Association - 3,4

Answer

No

Document Name

### Comment

In Section 11.2, NRECA strongly recommends that a time limit be added for how long NERC Reliability Standards Staff has to evaluate a supporting document. Without a time limit requirement, there is no incentive for NERC Reliability Standards Staff to act on the request. NRECA recommends that a 120 day time limit requirement be added for NERC staff to complete and announce publicly to the Standards Committee whether a supporting document has met the three criteria. Additionally, NERC staff should notify the requester within 10 days, after finishing their 120 day evaluation, what the next steps are as proposed in the paragraphs after the three criteria in Section 11.2.

Likes 0

Dislikes 0

### Response

#### John Seelke - LS Power Transmission, LLC - 1

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Romel Aquino - Edison International - Southern California Edison Company - 3	
Answer	Yes
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
David Kiguel - David Kiguel - 8	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

**Response**

**Andrew Gallo - Austin Energy - 6**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Steven Rueckert - Western Electricity Coordinating Council - 10**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Michelle Amarantos - APS - Arizona Public Service Co. - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 1,3,4,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**David Greyerbiehl - CMS Energy - Consumers Energy Company - 1,3,4,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC**

Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Chris Gowder - Chris Gowder On Behalf of: Carol Chinn, Florida Municipal Power Agency, 5, 6, 4, 3; David Schumann, Florida Municipal Power Agency, 5, 6, 4, 3; Joe McKinney, Florida Municipal Power Agency, 5, 6, 4, 3; Ken Simmons, Gainesville Regional Utilities, 1, 3, 5; Lynne Mila, City of Clewiston, 4; Randy Hahn, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 5, 6, 4, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Chris Gowder, Group Name FMPA</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Michael Godbout - Hydro-Qu?bec TransEnergie - 1 - NPCC</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Lauren Price - American Transmission Company, LLC - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	

Likes 0

Dislikes 0

**Response**

**David Ramkalawan - Ontario Power Generation Inc. - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jamie Monette - Allete - Minnesota Power, Inc. - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

**Document Name**

**Comment**

While LSPT understands that this section is intended to be limited to technical documents, that limitation is not made clear. Therefore, LSPT recommends that the word “technical” be inserted in the Section 11 heading – “Process for Approving Supporting *Technical* Documents.” “Technical” should also be included in the first sentence, which LSPT recommends modifying as follows: “The NERC Standards Committee oversees the development and approval of *technical* documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority.”

Likes 0

Dislikes 0

**Response**

**Thomas Rafferty - Edison International - Southern California Edison Company - 5**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.

Likes 0

Dislikes 0

**Response**

**Kenya Streeter - Edison International - Southern California Edison Company - 6**

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>CenterPoint Energy does not agree with the revisions to Section 11.0 and is unclear why the proposed edits are necessary. The Company believes the deletion of "Guidelines" in particular from the type of supporting document identified under Section 11.0 creates confusion. This proposed deletion coupled with the separation of the "Guidelines and Technical Basis" section from the development of CIP-013 creates uncertainty regarding the status of this vital information moving forward. How will this information be developed in future? Who will "own" this information? Where will it be stored? How will it be reviewed, revised, and approved? Many registered entities utilize the "Guidelines and Technical Basis" section when reviewing a proposed Standard to better understand the Standard Drafting Team's intent. This information can be key in determining how to ballot a proposed Standard. There is reference in Section 11.0 to compliance approaches being developed "in accordance with the applicable NERC Compliance Monitoring and Enforcement Program process"; however, this process is unclear in the context of "Guidelines and Technical Basis". CenterPoint Energy recommends that the proposed edits to Section 11.0 be deleted until further clarification is shared with the industry.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	

8. Do you agree with the proposed process for vetting documents that may be posted as a supporting document to an approved Reliability Standard?

Barry Lawson - National Rural Electric Cooperative Association - 3,4

Answer No

Document Name

Comment

See comments above in question 7.

Likes 0

Dislikes 0

Response

Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2

Answer No

Document Name

Comment

Section 11.0 starts off with, 'The NERC Standards Committee oversees the development and approval of documents identified as supporting documents to Reliability Standards approved by the Applicable Governmental Authority.' The SRC believes that to better perform the oversight role, the Standards Committee should have more visibility into the supporting documents that are submitted into the process. As drafted the Standards Committee would only be notified of supporting documents that have passed an initial screening. The SRC suggests that NERC Reliability Staff provide reports to the Standards Committee on types of supporting evidence that are submitted, and establish a tracking tool to monitor how the vetting process is progressing that may include: entity submitting, topic of material and technical resources used to support the vetting process. An SDT should be obligated to make supporting documents available to stakeholders that they relied upon to arrive at a conclusion/proposal. The SRC believes this would provide for a more transparent process that will improve the supported current proposal.

Likes 0

Dislikes 0

Response

Mark Riley - Associated Electric Cooperative, Inc. - 1, Group Name AECI & Member G&Ts

Answer No

Document Name

Comment

Please reference NRECA's response to question 7.

Likes 0

Dislikes 0

### Response

**Chris Gowder - Chris Gowder On Behalf of: Carol Chinn, Florida Municipal Power Agency, 5, 6, 4, 3; David Schumann, Florida Municipal Power Agency, 5, 6, 4, 3; Joe McKinney, Florida Municipal Power Agency, 5, 6, 4, 3; Ken Simmons, Gainesville Regional Utilities, 1, 3, 5; Lynne Mila, City of Clewiston, 4; Randy Hahn, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 5, 6, 4, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Chris Gowder, Group Name FMPA**

Answer

No

Document Name

### Comment

Supporting documents should be posted for stakeholder comment regardless of whether they are being developed alongside development of an associated Reliability Standard or separately. As currently drafted, it is not clear whether a public comment period is required to achieve "adequate stakeholder review". We believe it should be.

Likes 0

Dislikes 0

### Response

**Michael Haff - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC**

Answer

No

Document Name

### Comment

Adopt the comments of the National Rural Electric Cooperative Association (NRECA).

Likes 0

Dislikes 0

### Response

**Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF**

Answer

No

Document Name

**Comment**

Supporting Documentation may contain examples of a certain way an applicable entity could become compliant with the Standard. There is really no one size fits all approach for every entity to do the same thing and everyone be compliant. FERC Order 693 section 253 states that in order to be compliant you need to satisfy the Requirement. FERC also said in FERC Order 706, section 73, that “Measures are intended to gauge or document compliance, failure to meet a Measure is almost always going to result in a violation”. The SPM should expand the example of possible compliance actions an entity could use to be compliant.

Likes 1

Larry Heckert, N/A, Heckert Larry

Dislikes 0

**Response****LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6****Answer**

No

**Document Name****Comment**

Please refer to response to question 7.

Likes 2

Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex; Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne

Dislikes 0

**Response****Thomas Foltz - AEP - 5****Answer**

No

**Document Name****Comment**

Supporting documentation, white papers for example, are often voluminous and/or fairly complex. The existing 45 day comment period is more appropriate than the proposed 30 days, and would allow industry to develop and provide more meaningful input.

Likes 0

Dislikes 0

**Response****Romel Aquino - Edison International - Southern California Edison Company - 3**

Answer	Yes
Document Name	
<b>Comment</b>	
None.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
None	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators</b>	
Answer	Yes
Document Name	
<b>Comment</b>	

Likes 0

Dislikes 0

**Response**

**Jamie Monette - Allele - Minnesota Power, Inc. - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**David Ramkalawan - Ontario Power Generation Inc. - 5**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Lauren Price - American Transmission Company, LLC - 1**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Michael Godbout - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

**Response**

**David Greyerbiehl - CMS Energy - Consumers Energy Company - 1,3,4,5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 1,3,4,5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Michelle Amarantos - APS - Arizona Public Service Co. - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Steven Rueckert - Western Electricity Coordinating Council - 10**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Andrew Gallo - Austin Energy - 6**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>John Seelke - LS Power Transmission, LLC - 1</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>David Kiguel - David Kiguel - 8</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Kenya Streeter - Edison International - Southern California Edison Company - 6</b>	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison	

Likes 0

Dislikes 0

**Response**

**Thomas Rafferty - Edison International - Southern California Edison Company - 5**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.

Likes 0

Dislikes 0

**Response**

**9. Do you have any other comments concerning Section 11.0 of the SPM?**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

**Document Name**

**Comment**

No.

Likes 0

Dislikes 0

**Response**

**David Kiguel - David Kiguel - 8**

**Answer**

**Document Name**

**Comment**

The plural word "criteria" is repeatedly used in Section 11.2 to refer to the singular. The correct singular word is "criterion." I suggest correcting.

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

**Document Name**

**Comment**

No.

Likes 0

Dislikes 0

**Response**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

**Document Name**

**Comment**

No

Likes 0

Dislikes 0

**Response**

**LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6**

**Answer**

**Document Name**

**Comment**

No

Likes 2

Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex; Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne

Dislikes 0

**Response**

**Thomas Foltz - AEP - 5**

**Answer**

**Document Name****Comment**

AEP's negative votes are primarily driven by our objections to reducing the turnaround time to less than 45 days for comment periods associated with Interpretations and Supporting Documentation.

Likes 0

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name** RSC no Dominion

**Answer****Document Name****Comment**

Please consider using a term other than "Lesson Learned" as a type of document. If the objective of the "Lesson Learned" document is to convey implementation information, then the type of document could be "implementation information" or "implementation considerations" or "implementation references." The term "Lesson Learned" is already used in the ERO Event Analysis Process.

Likes 0

Dislikes 0

**Response**

**Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name** PPL NERC Registered Affiliates

**Answer****Document Name****Comment**

Yes, we have the following five (5) comments concerning Section 11 (Process for Approving Supporting Documents):

1. For the types of documents that were struck from Section 11.1 ("Guideline", "Supplement", "Training Material", and "Procedure"), please provide clarification on where these types of documents will now be classified (i.e. as a "Reference" document or through the NERC Compliance Monitoring and Enforcement Program process). As one example, within EOP-011-1, what type of document would "Application Guidelines: Guidelines and Technical Basis" be considered under the proposed revisions? As another example, within BAL-003-1, what type of document would "Attachment A: BAL-003-1 Frequency Response & Frequency Bias Setting Standard Supporting Document" be considered under the proposed revisions?
  - i. If the "Guidelines and Technical Basis" (i.e. "Application Guidelines: Guidelines and Technical Basis and Attachment A: BAL-003-1) would be considered a part of the NERC Compliance Monitoring and Enforcement Program process as part of the proposed revisions to the SPM, we strongly disagree with the proposed revisions, since that would not provide industry an opportunity to comment and vote on changes to such guidelines.

- ii. To provide clarity on what is the nature and extent of the proposed changes in Section 11, we request that NERC provide either a complete or illustrative list of “supporting documents,” and show in which “type of document” they are currently categorized, their proposed category, and what SPM or other process will be applicable to them in the future. Specifically, please provide clarity with respect to how changes to Section 11 relate to the documents provided on the NERC website in the Compliance & Enforcement / Compliance Guidance program area and the Compliance Guidance Policy. Please note that the NERC Compliance guidance Policy (Effective November 5, 2015) contains on page 3 a discussion of Section 11 of the SPM.
- 2. The language describing the “Reference” documents is unclear as to what kind of information would meet this definition. Expounding upon the description and providing examples of documents that would be classified in this category would clarify what is encompassed in “Supporting Documents” subject to the process under Section 11.
- 3. The Drafting Team Reference Manual (Version 3, October 19, 2016) (DTRM) includes several pages entitled “Parts of the Results-Based Standard” which provides an itemized description of each “part of the results-based NERC Reliability Standard.” *Section F – References* includes “a form or other document to support the implementation of a standard.” Additionally, “Supplemental Material” is also listed as a “Part of the Results-Based Standard” in the DTRM and indicates “Documents that should appear in this section are as follows: Application Guidelines, Guidelines and Technical Basis, Training Material, Reference Material, and/or other Supplemental Material.” Therefore, the proposed revisions to Section 11 of the SPM are not consistent with the DTRM. We suggest that NERC propose modifications to the DTRM consistent with the instant proposal and post both documents concurrently to ensure consistency.
- 4. The second criteria in the second paragraph of Section 11.2 (Process for Proposing and Evaluating Supporting Documents) requires NERC Staff to judge whether the proposed supporting document is consistent “with the purpose and intent” of the associated Reliability Standard. Each Reliability Standard has a “Purpose” section, but it is unclear what will be used as a reference to judge “intent” of a Reliability Standard.
- 5. The last part of the process in Section 11.2 (Process for Proposing and Evaluating Supporting Documents) provides for a submitter to modify the proposed supporting documents after sufficient stakeholder review, in which case NERC Staff “may” post the document for additional comment periods. Since sufficient stakeholder review is the goal, the process should be that modified proposed supporting document also be available for stakeholder comment. As such, we propose the sentence be modified to “...NERC Staff will post the document for additional comment periods...”

Likes 0

Dislikes 0

**Response**

**Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric**

**Answer**

**Document Name**

**Comment**

No

Likes 0

Dislikes 0

**Response****Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion****Answer****Document Name****Comment**

Dominion suggests adding that documents issued by other groups (i.e. Reliability Guidelines issued by the Operating and Planning Committees) that are not related to a specific Standard be included in the exclusionary sentence immediately after the table in section 11.1.

Likes 0

Dislikes 0

**Response****James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5****Answer****Document Name****Comment**

None.

Likes 0

Dislikes 0

**Response****Thomas Rafferty - Edison International - Southern California Edison Company - 5****Answer****Document Name****Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.

Likes 0

Dislikes 0

**Response**

**Romel Aquino - Edison International - Southern California Edison Company - 3**

**Answer**

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**Kenya Streeter - Edison International - Southern California Edison Company - 6**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison

Likes 0

Dislikes 0

**Response**

**Lauren Price - American Transmission Company, LLC - 1**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb**

**Answer**

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

**Answer**

**Document Name**

**Comment**

We would like to see more clarity on if the Reliability Guidelines (especially the Functional Model) falls under this purview. If so, we recommend that this information be listed in this section of the document.

Likes 0

Dislikes 0

**Response**

**Jamie Monette - Allete - Minnesota Power, Inc. - 1**

**Answer**

**Document Name**

**Comment**

No

Likes 0

Dislikes 0

**Response**

**Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name** ACES Standards Collaborators

**Answer**

**Document Name**

**Comment**

The current approach using the addition of calendar days does not recognize Federal holidays or the possibility of office closures and scheduled vacations. Historically, there has been a push to address commenting periods before the end of the year, and a 30-day commenting period during the months of November and December are burdensome. We concur that a minimum 30-day period is ample time for commenting on an interpretation, with the condition that the commenting period ends on the first business day following a specific calendar date of each month, such as the 15th. For example, a posting for comment on May 1st would therefore end on June 15th.

Likes 0

Dislikes 0

**Response**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name** Southern Company

**Answer**

**Document Name**

**Comment**

No.

Likes 0

Dislikes 0

**Response**

10. Do you agree that an appellant should be able to withdraw its Level 1 or Level 2 appeal under Section 8 of the SPM by providing written notice to the NERC Director of Standards?

Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb

Answer Yes

Document Name

Comment

KCP&L's affirmative position is not without concern.

The Standard drafting appeal option is important to the integrity of the drafting process; it is also a powerful option that allows a single entity to disrupt or delay the drafting process. The company sees the value of withdrawing an appeal in the event the issues on appeal are resolved but also can see the efficiencies and resource optimization sought by the withdrawal provision being unrealized should entities have an easy out and begin to look at leveraging appeals for purposes of disruption and delay.

The proposed Section 8 revision is without limitation and provides that the appellant may withdraw its complaint without explanation and without any specific reason; it only requires the notice is made prior to issuance of the written notice. For Section 8 to fully address the frivolous appeals scenario, the revisions would likely add undesired complexity to the process. To reconcile the view of providing a withdrawal option on resolution of the conditions that gave rise to the appeal with the view of the potential for abuse for the sole purpose of disruption and delay, the company suggests requiring appellants provide in their withdrawal notice what conditions have changed to precipitate the withdrawal. Such a requirement does not seem onerous and provides some level of accountability. Moreover, it is informative when considering future revisions to Section 8 or the Standards drafting process.

Suggested Language:

At any time prior to receiving the written response to the Level 1 Appeal, an appellant may withdraw the Level 1 Appeal with written notice to the Director of Standards. The notice shall identify what conditions have changed since submitting the complaint and have precipitated the appellant's notice of withdrawal.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

**Response**

**Barry Lawson - National Rural Electric Cooperative Association - 3,4**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jamie Monette - Allete - Minnesota Power, Inc. - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**David Ramkalawan - Ontario Power Generation Inc. - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Mark Riley - Associated Electric Cooperative, Inc. - 1, Group Name AECI & Member G&Ts**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Lauren Price - American Transmission Company, LLC - 1**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Romel Aquino - Edison International - Southern California Edison Company - 3**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**David Greyerbiehl - CMS Energy - Consumers Energy Company - 1,3,4,5**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

**Response**

**Michael Haff - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Chris Gowder - Chris Gowder On Behalf of: Carol Chinn, Florida Municipal Power Agency, 5, 6, 4, 3; David Schumann, Florida Municipal Power Agency, 5, 6, 4, 3; Joe McKinney, Florida Municipal Power Agency, 5, 6, 4, 3; Ken Simmons, Gainesville Regional Utilities, 1, 3, 5; Lynne Mila, City of Clewiston, 4; Randy Hahn, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 5, 6, 4, 3; Tom Reedy, Florida Municipal Power Pool, 6; - Chris Gowder, Group Name FMPA**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Michael Godbout - Hydro-Quebec TransEnergie - 1 - NPCC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 1,3,4,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Michelle Amarantos - APS - Arizona Public Service Co. - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name** Dominion

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name** MRO NSRF

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name** DTE Energy - DTE Electric

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Steven Rueckert - Western Electricity Coordinating Council - 10**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6**

**Answer** Yes

**Document Name**

**Comment**

Likes 2

Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex; Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne

Dislikes 0

**Response**

**Andrew Gallo - Austin Energy - 6**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**David Kiguel - David Kiguel - 8**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Kenya Streeter - Edison International - Southern California Edison Company - 6**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison

Likes 0

Dislikes 0

**Response**

**Thomas Rafferty - Edison International - Southern California Edison Company - 5**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.

Likes 0

Dislikes 0

**Response**

**11. Do you have any comments concerning the non-substantive updates to Sections 2.1 and 3.7 of the SPM?**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

**Document Name**

**Comment**

No.

Likes 0

Dislikes 0

**Response**

**John Seelke - LS Power Transmission, LLC - 1**

**Answer**

**Document Name**

**Comment**

No.

Likes 0

Dislikes 0

**Response**

**Andrew Gallo - Austin Energy - 6**

**Answer**

**Document Name**

Revisions to the NERC Standard Processes Manual SP-Appendix\_3A\_StandardsProcessesManual\_clean(3-2-17 - Austin Energy).docx

**Comment**

Please see Austin Energy's comments regarding the proposed revisions (attached).

Likes 0

Dislikes 0

**Response**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

**LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6**

Answer

Document Name

Comment

No

Likes 2

Public Utility District No. 2 of Grant County, Washington, 5, Ybarra Alex; Public Utility District No. 2 of Grant County, Washington, 4, McMackin Yvonne

Dislikes 0

Response

**John Seelke - LS Power Transmission, LLC - 1**

Answer

Document Name

Comment

No

Likes 0

Dislikes 0

Response

**Shelby Wade - PPL NERC Registered Affiliates - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates**

Answer

<b>Document Name</b>	
<b>Comment</b>	
Yes. Section 2.1 (Definition of a Reliability Standard) should be simplified to reference the NERC Rules of Procedures Section 200 rather than reiterating the Rules of Procedure definition in the SPM, since it may give the appearance that the term is being defined by the SPM. Additionally, this will eliminate the need to update this section of the SPM in the future, eliminate duplication, and remove the possibility of error when replicating the definition in the SPM.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 4, Group Name MRO NSRF</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
None	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
No	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>James Anderson - CMS Energy - Consumers Energy Company - 1,3,4,5</b>	
<b>Answer</b>	

<b>Document Name</b>	
<b>Comment</b>	
None.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Michael Haff - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
In the definition of "Reliability Standard" in Section 2.1 on page 6 of the redlined version, capital "Facilities" has been revised to lowercase "facilities". I wanted to discuss whether NERC is doing this purposely so that it may be able to argue that it can expand its reach past the defined term BES Facilities.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Michael Godbout - Hydro-Qu?bec TransEnergie - 1 - NPCC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Governments in different provinces do not necessarily approve standards, etc. By statute or regulation, they endow governmental authorities to do so on their behalf. Also, no authority approves a withdrawn Reliability Standard, it approves the withdrawal of a Reliability Standard. Finally, the structure of the edit "that have recognized... ERO have the authority" could be made clearer.	
We suggest the following text:	
"A governmental authority has the authority in its jurisdiction, by statute or regulation, to approve and withdraw Reliability Standards, definitions, Variances, VRF, VSL and Interpretations following their adoption, approval or withdrawal by the NERC Board of Trustees. For example, the Federal Energy Regulatory Commission ("FERC") is the governmental authority in the United States of America."	
Likes 0	
Dislikes 0	

**Response**

**Thomas Rafferty - Edison International - Southern California Edison Company - 5**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison.

Likes 0

Dislikes 0

**Response**

**Romel Aquino - Edison International - Southern California Edison Company - 3**

**Answer**

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**Kenya Streeter - Edison International - Southern California Edison Company - 6**

**Answer**

**Document Name**

**Comment**

Please refer to comments submitted by Deborah VanDeventer on behalf of Southern California Edison

Likes 0

Dislikes 0

**Response**

**Lauren Price - American Transmission Company, LLC - 1**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Deborah VanDeventer - Edison International - Southern California Edison Company - 1,3,5,6 - WECC**

**Answer**

**Document Name**

**Comment**

No comments or concerns for Section 2.1 and 3.7 changes.

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

**Answer**

**Document Name**

**Comment**

As for Section 2.1, we recommend that the Guideline Technical Basis (GTB) Section be mentioned in the definition of a Reliability Standard. This is an integral part of the Standard as it explains the drafting team's intent for developing a particular Requirement.

Likes 0

Dislikes 0

**Response**

Douglas Webb - Douglas Webb On Behalf of: Chris Bridges, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Harold Wyble, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; James McBee, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; Jessica Tucker, Great Plains Energy - Kansas City Power and Light Co., 3, 6, 5, 1; - Douglas Webb

**Answer**

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**Jamie Monette - Allete - Minnesota Power, Inc. - 1**

**Answer**

**Document Name**

**Comment**

No

Likes 0

Dislikes 0

**Response**

**Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators**

**Answer**

**Document Name**

**Comment**

(1) The blank pages and orphan citations embedded within the document should be removed. We identify Sections 10.7 (Figure 3) on page 42 and 10.14 (Figure 4) on page 45 as examples.

(2) Unless initiated by a FERC directive or detection of a flawed Reliability Standard that causes reliability-related concerns or is a burden for Industry to implement, we believe a certain time period should pass between standard revisions to allow existing standards time to mature. The current frequency of once every five years from the effective date of the Reliability Standard or the date of Board adoption does not account for the transition of many standards with scalable implementation periods. Furthermore, we believe a risk-based approach should be used to select standards for revision. This would then focus standard development projects on retiring requirements that are identified as low risk of occurrence and as low risk to the reliable operations and planning of the Bulk Electric System and its Cyber Systems.

(3) We thank you for this opportunity to provide these comments.

Likes 0

Dislikes 0

**Response**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer**

**Document Name**

**Comment**

No.

Likes 0

Dislikes 0

**Response**