

Comment Report

Project Name: Technical Rationale for Reliability Standards (Second Posting)
Comment Period Start Date: 3/5/2020
Comment Period End Date: 4/20/2020
Associated Ballots: Technical Rationale for Reliability Standards BAL-005-1 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards EOP-008-2 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards NUC-001-3 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards PRC-005-6 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards PRC-006-3 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards PRC-006-SERC-02 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards TOP-002-4 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards TOP-003-3 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards TOP-010-1(i) Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards VAR-501-WECC-3.1 Non-Binding Poll IN 1 NB

There were 37 sets of responses, including comments from approximately 106 different people from approximately 87 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. BAL-005-1: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

2. EOP-008-2: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

3. NUC-001-3: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

4. TOP-002-4: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

5. TOP-003-3: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

6. TOP-010-1(i): Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

7. PRC-005-6: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

8. PRC-006-3: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

9. PRC-006-SERC-02: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

10. VAR-501-WECC-3.1: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Southwest Power Pool, Inc. (RTO)	Charles Yeung	2	SPP RE	SRC 2020	Charles Yeung	SPP	2	MRO
					Ali Miremadi	CAISO	1	WECC
					Nathan Bigbee	ERCOT	1	Texas RE
					Helen Lainis	IESO	1	NPCC
					Matt Goldberg	ISONE	1	NPCC
					Dave Zwergel	MISO	3	MRO
					Greg Campoli	NYISO	1	NPCC
MRO	Dana Klem	1,2,3,4,5,6	MRO	MRO NSRF	Joseph DePoorter	Madison Gas & Electric	3,4,5,6	MRO
					Larry Heckert	Alliant Energy	4	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jodi Jensen	Western Area Power Administration	1,6	MRO
					Andy Crooks	SaskPower Corporation	1	MRO
					Bryan Sherrow	Kansas City Board of Public Utilities	1	MRO
					Bobbi Welch	Omaha Public Power District	1,3,5,6	MRO
					Jeremy Voll	Basin Electric Power Cooperative	1	MRO
					Bobbi Welch	Midcontinent ISO	2	MRO
					Douglas Webb	Kansas City Power & Light	1,3,5,6	MRO
					Fred Meyer	Algonquin Power Co.	1	MRO
					John Chang	Manitoba Hydro	1,3,6	MRO
					James Williams	Southwest Power Pool, Inc.	2	MRO

					Jamie Monette	Minnesota Power / ALLETE	1	MRO
					Jamison Cawley	Nebraska Public Power	1,3,5	MRO
					Sing Tay	Oklahoma Gas & Electric	1,3,5,6	MRO
					Terry Harbour	MidAmerican Energy	1,3	MRO
					Troy Brumfield	American Transmission Company	1	MRO
Douglas Webb	Douglas Webb		MRO,SPP RE	Westar-KCPL	Doug Webb	Westar	1,3,5,6	MRO
					Doug Webb	KCP&L	1,3,5,6	MRO
Duke Energy	Kim Thomas	1,3,5,6	FRCC,RF,SERC	Duke Energy	Laura Lee	Duke Energy	1	SERC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Southern Company - Southern Company Services, Inc.	Marsha Morgan	1,3,5,6	SERC	Southern Company	Katherine Prewitt	Southern Company Services, Inc	1	SERC
					Jennifer Sykes	Southern Company Generation and Energy Marketing	6	SERC
					R Scott Moore	Alabama Power Company	3	SERC
					William Shultz	Southern Company Generation	5	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC Regional Standards Committee	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Alan Adamson	New York State	7	NPCC

	Reliability Council		
David Burke	Orange & Rockland Utilities	3	NPCC
Michele Tondalo	UI	1	NPCC
Helen Lainis	IESO	2	NPCC
Sean Cavote	PSEG	4	NPCC
Kathleen Goodman	ISO-NE	2	NPCC
David Kiguel	Independent	7	NPCC
Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
Nick Kowalczyk	Orange and Rockland	1	NPCC
Joel Charlebois	AESI - Acumen Engineered Solutions International Inc.	5	NPCC
Mike Cooke	Ontario Power Generation, Inc.	4	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Shivaz Chopra	New York Power Authority	5	NPCC
Mike Forte	Con Ed - Consolidated Edison	4	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Ashmeet Kaur	Con Ed - Consolidated Edison	5	NPCC

					Caroline Dupuis	Hydro Quebec	1	NPCC
					Chantal Mazza	Hydro Quebec	2	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
					Laura McLeod	NB Power Corporation	5	NPCC
					Randy MacDonald	NB Power Corporation	2	NPCC
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Silvia Parada Mitchell	NextEra Energy, LLC	4	NPCC
					John Hastings	National Grid	1	NPCC
					Mike Jones	National Grid	3	NPCC
OGE Energy - Oklahoma Gas and Electric Co.	Sing Tay	6	SPP RE	OKGE	Sing Tay	OGE Energy - Oklahoma	6	MRO
					Terri Pyle	OGE Energy - Oklahoma Gas and Electric Co.	1	MRO
					Donald Hargrove	OGE Energy - Oklahoma Gas and Electric Co.	3	MRO
					Patrick Wells	OGE Energy - Oklahoma Gas and Electric Co.	5	MRO

1. BAL-005-1: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Kjersti Drott - Tri-State G and T Association, Inc. - 1

Answer No

Document Name

Comment

Tri-State prefers the Guidance and Technical Basis (GTB) continue to be included in the same process as standards development. Specifically, we would like to see the GTB continue to be developed at the same time as the standard, and posted for comment at the same time as the standard. Without these documents combined, what assurance does industry have that they will be developed in tandem and posted for industry comment in tandem? The primary reason is to allow entities to comment on the GTB during the drafting of the standard. For example, the Virtualization project has extensive Technical Rationale which Tri-State has used as a basis for understanding the changes and for making comments on the standards under development.

Likes 0

Dislikes 0

Response

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Salt River Project (SRP) sees this as an administrative task that does not add to the reliability of the Bulk Electric System. Separating out the Guidelines and technical rationale into separate documents would require the tracking of these documents for updates. SRP also has process documentation that references the GTB sections of the standard that would need to be updated to reference the new documents. SRP also likes the GTB within the standards so they may be reviewed when there is a revision to the standard.

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike

Answer No

Document Name**Comment**

The GTB sections within the Standards provide background information and context for the Requirements and Measures, often helping interpret what is found in the Standards. Removal of this section results in less structure with interpretation of the Standards. Tacoma Power would prefer that the GTB section remain in the Standard, but if the GTB section is to be ultimately transitioned to a separate Technical Rationale document, it is requested that hyperlink references be provided within the Standard and the applicable Technical Rationale documents in order to maintain continuity.

Likes 0

Dislikes 0

Response**Jeanne Kurzynowski - Consumers Energy Company - 1,3,4,5 - RF****Answer**

No

Document Name**Comment**

We prefer to have the rational retained with the standard. We refer to it for help to explain the meaning and intent of the current standard. Keeping the related information with the standard saves additional searching for the information.

Likes 0

Dislikes 0

Response**Kevin Salsbury - Berkshire Hathaway - NV Energy - 5****Answer**

No

Document Name**Comment**

NV Energy supports and agrees with EEI's comments on the removal of the Technical Rationale from BAL-005-1, and disagreement with the manner and method this is being done. For these reasons, we ask NERC to add the following information to provide needed context in the new Technical Rationale document to ensure proper linkage between the Standard and this new document:

- • Project Number under which the Technical Rationale was developed
- • Date the Technical Rational was originally developed
- • Hyperlink to the Project Page
- • Date the Reliability Standard was approved

• [Hyperlink to the Standard](#)

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5

Answer

No

Document Name

Comment

The entire **Technical Rationale for Reliability Standards Project** is an inefficient and unnecessary administrative task that undermines the value of the Industry vetted and FERC approved Reliability Standards.

This project adds zero value to the reliability of the BES, at what expense? This project creates more confusion, not less; more paperwork, not less; several more Balloting and Commenting events, not less; consumes more staff time, money and resources for NERC, Regional Entities, and Registered Entities, not less.

The end product, after the estimated five or more years this project will take, will be yet more NERC documents for each Reliability Standard and zero Reliability improvement to the BES.

NCPA also support comments by Salt-River Project, Tacoma Power, and Tri-State related to this second posting of the subject project.

Likes 0

Dislikes 0

Response

Michael Whitney - Northern California Power Agency - 3

Answer

No

Document Name

Comment

The entire **Technical Rationale for Reliability Standards Project** is an inefficient and unnecessary administrative task that undermines the value of the Industry vetted and FERC approved Reliability Standards.

This project adds zero value to the reliability of the BES, at what expense? This project creates more confusion, not less; more paperwork, not less; several more Ballot and Commenting events, no less; consumes more staff time, money and resources for NERC, Regional Entities, and Registered Entities, not less.

The end product, after the estimated five or more years this project will take, will be yet more NERC documents for each Reliability Standard and zero Reliability improvement to the BES.

NCPA also supports comments by Salt-River Project, Tacoma Power, and Tri-State related to this second posting of the subject project.

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer

No

Document Name

Comment

In general, Reclamation recommends GTB and Rationale should be kept in their current format within each standard. Reclamation recommends that the content of GTB and Rationale can be revised to provide experience gained (similar to lessons learned) from implementing and using the standards. Technical basis can be beneficial for implementing and understanding the requirements of the standards. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.

Reclamation acknowledges that BAL-005-1 does not have a GTB, but asserts the Rationale provides useful information. In this situation, Reclamation recommends the Supplemental Material section be retained.

Reclamation recommends standards should not be revised simply for the sake of revising the format. Standards should be revised only when the content needs to be updated. Any changes to format should be incorporated at the time of content revisions. If GTB and Rationale must be removed from their standards, Reclamation recommends NERC publish GTB and Rationale in a "book" type aggregation to facilitate ease of locating the information.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer

No

Document Name

Comment

The entire **Technical Rationale for Reliability Standards Project** is an inefficient and unnecessary administrative task that undermines the value of the Industry vetted and FERC approved Reliability Standards.

This project adds zero value to the reliability of the BES, at what expense? This project creates more confusion, not less; more paperwork, not less; several more Ballot and Commenting events, no less; consumes more staff time, money and resources for NERC, Regional Entities, and Registered Entities, not less. The end product, after the estimated five or more years this project will take, will be yet more NERC documents for each Reliability Standard and zero Reliability improvement to the BES.

NCPA also support comments by Salt-River Project, Tacoma Power, and Tri-State related to this second posting of the subject project.

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

No Comments.

Likes 0

Dislikes 0

Response

Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE

Answer

Yes

Document Name

Comment

Oklahoma Gas & Electric supports Edison Electric Institute's (EEI) response.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

Duke Energy agrees with Recommendation provided the:

(1) Reliability Standard revision number does not change (minimizes administrative burden),

(2) Removed Guideline/Technical Basis/Rationale information is placed on the NERC Website in its entirety under the Reliability Standards “Related Information” section (readily provides information access), and

(3) NERC Standing Committee concedes ownership of the removed Guideline/Technical Basis/Rationale information and mandates that present and future NERC Standards Drafting Team(s) dutifully update and revise this information to keep its content up-to-date (ensures information is available and current).

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name

Comment

Texas RE recommends reviewing the following sentence (or similar sentences) in all Technical Rationale documents: “Upon BOT approval, the text from the rationale text boxes was moved to this section.” This is not exactly a true statement anymore.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Yes

Document Name

Comment

Exelon concurs with the comments submitted by EEI.

Submitted on behalf of Exelon for Segments 1, 3, 5, and 6.

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer

Yes

Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports the removal of the Technical Rationale (TR) from BAL-005-1, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:	
<ul style="list-style-type: none"> &bull; Project Number under which the Technical Rationale was originally developed &bull; Date the Technical Rational was originally developed 	
Likes 0	
Dislikes 0	
Response	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 1, 6, 5, 3; Derek Brown, Westar Energy, 1, 6, 5, 3; James McBee, Westar Energy, 1, 6, 5, 3; Marcus Moor, Westar Energy, 1, 6, 5, 3; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Energy (Westar Energy) incorporates by reference and supports the response of Edison Electric Institute and the response of MRO NERC Standards Review Forum (MRO NSRF).	
Likes 0	
Dislikes 0	
Response	

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee

Answer Yes

Document Name

Comment

Please consider revising the standard page numbering since the standard will have fewer pages. Please consider revising the Technical Rationale page numbering (Example: 1 of X number of pages.)

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

As stated by EEI:

EEI supports the removal of the Technical Rationale (TR) from BAL-005-1, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:

- Project Number under which the Technical Rationale was originally developed
- Date the Technical Rationale was originally developed

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Minnesota Power agrees that the use of the term "guideline" in the GTB section can create confusion while developing compliance approaches. If the intent of this section is to explain the technical basis for the Standard and provide technical guidance and not to provide compliance examples or

compliance language, then separating it from the Standard will address this. Creating separate documents for Technical Rationale and Implementation Guidance will be helpful to further clarify the distinction between the two.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2020

Answer

Yes

Document Name

Comment

Consider defining acronyms upon first use since this will be a stand-alone document.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer

Yes

Document Name

Comment

California ISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee.

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amaranantos - Michelle Amaranantos

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Colleen Campbell - AES - Indianapolis Power and Light Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Glenn Barry - Los Angeles Department of Water and Power - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Neil Shockey - Edison International - Southern California Edison Company - 5

Answer

Document Name

Comment

Please see comments submitted by Edison Electric Institute.

Likes 0

Dislikes 0

Response

Teresa Cantwell - Lower Colorado River Authority - 5

Answer	
Document Name	
Comment	
N/A - No opinion.	
Likes 0	
Dislikes 0	
Response	

2. EOP-008-2: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

Please see Response to Question 1

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer No

Document Name

Comment

In general, Reclamation recommends GTB and Rationale should be kept in their current format within each standard. Reclamation recommends that the content of GTB and Rationale can be revised to provide experience gained (similar to lessons learned) from implementing and using the standards. Technical basis can be beneficial for implementing and understanding the requirements of the standards. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.

Reclamation acknowledges that EOP-008-2 does not have a GTB and asserts the Rationale appears to be more of a version history containing a list of errata changes or other information that should properly be contained in the "Background" section of the standard. In this situation, Reclamation recommends the irrelevant parts of the existing Rationale be deleted or the pertinent parts moved to the Background section of the standard.

Reclamation recommends standards should not be revised simply for the sake of revising the format. Standards should be revised only when the content needs to be updated. Any changes to format should be incorporated at the time of content revisions. If GTB and Rationale must be removed from their standards, Reclamation recommends NERC publish GTB and Rationale in a "book" type aggregation to facilitate ease of locating the information.

Likes 0

Dislikes 0

Response

Michael Whitney - Northern California Power Agency - 3

Answer	No
Document Name	
Comment	
See Response to Question 1	
Likes 0	
Dislikes 0	
Response	
Marty Hostler - Northern California Power Agency - 5	
Answer	No
Document Name	
Comment	
<p>The entire Technical Rationale for Reliability Standards Project is an inefficient and unnecessary administrative task that undermines the value of the Industry vetted and FERC approved Reliability Standards.</p> <p>This project adds zero value to the reliability of the BES, at what expense? This project creates more confusion, not less; more paperwork, not less; several more Balloting and Commenting events, not less; consumes more staff time, money and resources for NERC, Regional Entities, and Registered Entities, not less.</p> <p>The end product, after the estimated five or more years this project will take, will be yet more NERC documents for each Reliability Standard and zero Reliability improvement to the BES.</p> <p>NCPA also support comments by Salt-River Project, Tacoma Power, and Tri-State related to this second posting of the subject project.</p>	
Likes 0	
Dislikes 0	
Response	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	No
Document Name	
Comment	
<p>NV Energy supports and agrees with EEI's comments on the removal of the Technical Rationale from BAL-005-1, and disagreement with the manner and method this is being done. For these reasons, we ask NERC to add the following information to provide needed context in the new Technical Rationale document to ensure proper linkage between the Standard and this new document:</p>	

- Project Number under which the Technical Rationale was developed
- Date the Technical Rationale was originally developed
- Hyperlink to the Project Page
- Date the Reliability Standard was approved
- Hyperlink to the Standard

Likes 0

Dislikes 0

Response

Jeanne Kurzynowski - Consumers Energy Company - 1,3,4,5 - RF

Answer No

Document Name

Comment

We prefer to have the rationale retained with the standard. We refer to it for help to explain the meaning and intent of the current standard. Keeping the related information with the standard saves additional searching for the information.

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike

Answer No

Document Name

Comment

The GTB sections within the Standards provide background information and context for the Requirements and Measures, often helping interpret what is found in the Standards. Removal of this section results in less structure with interpretation of the Standards. Tacoma Power would prefer that the GTB section remain in the Standard, but if the GTB section is to be ultimately transitioned to a separate Technical Rationale document, it is requested that hyperlink references be provided within the Standard and the applicable Technical Rationale documents in order to maintain continuity.

Likes 0

Dislikes 0

Response

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Salt River Project (SRP) sees this as an administrative task that does not add to the reliability of the Bulk Electric System. Separating out the Guidelines and technical rational into separate documents would require the tracking of these documents for updates. SRP also has process documentation that references the GTB sections of the standard that would need to be updated to reference the new documents. SRP also likes the GTB within the standards so they may be reviewed when there is a revision to the standard.

Likes 0

Dislikes 0

Response

Kjersti Drott - Tri-State G and T Association, Inc. - 1

Answer No

Document Name

Comment

Tri-State prefers the Guidance and Technical Basis (GTB) continue to be included in the same process as standards development. Specifically, we would like to see the GTB continue to be developed at the same time as the standard, and posted for comment at the same time as the standard. Without these documents combined, what assurance does industry have that they will be developed in tandem and posted for industry comment in tandem? The primary reason is to allow entities to comment on the GTB during the drafting of the standard. For example, the Virtualization project has extensive Technical Rationale which Tri-State has used as a basis for understanding the changes and for making comments on the standards under development.

Likes 0

Dislikes 0

Response

Glenn Barry - Los Angeles Department of Water and Power - 5

Answer Yes

Document Name

Comment

LDWP agrees with the recommendation, but only if the Standard number changes; even if this is EOP-008-2(i), a naming convention that NERC has used in the past. The Standard may be functionally the same, but it is still different. LDWP does not believe that there should be deviation from this convention.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer

Yes

Document Name

Comment

California ISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2020

Answer

Yes

Document Name

Comment

Non-substantive suggestion to add quotation marks after the word “communications” so that the sentence reads: “**Rationale for Requirement R1:** The phrase “data exchange capabilities” is replacing “data communications” in Requirement R1, Part 1.2.2 for the following reasons:”

Also, this sentence may need to be rephrased to indicate that the rationale is a separate document from the Reliability Standard: “The rationale included in the IRO-002-4 standard discusses the need to retain the topic of data exchange, as it is not addressed in the COM standards.”

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Minnesota Power agrees that the use of the term “guideline” in the GTB section can create confusion while developing compliance approaches. If the intent of this section is to explain the technical basis for the Standard and provide technical guidance and not to provide compliance examples or compliance language, then separating it from the Standard will address this. Creating separate documents for Technical Rationale and Implementation Guidance will be helpful to further clarify the distinction between the two.

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Yes

Document Name**Comment****As stated by EEI:**

EEI supports the removal of the Technical Rationale (TR) from EOP-008-2, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:

- • Project Number under which the Technical Rationale was originally developed
- • Date the Technical Rational was originally developed

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee

Answer

Yes

Document Name**Comment**

Please consider revising the standard page numbering since the standard will have fewer pages. Please consider revising the Technical Rationale page numbering (Example: 1 of X number of pages.)

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 1, 6, 5, 3; Derek Brown, Westar Energy, 1, 6, 5, 3; James McBee, Westar Energy, 1, 6, 5, 3; Marcus Moor, Westar Energy, 1, 6, 5, 3; - Douglas Webb, Group Name Westar-KCPL

Answer

Yes

Document Name

Comment

Energy (Westar Energy) incorporates by reference and supports the response of Edison Electric Institute and the response of MRO NERC Standards Review Forum (MRO NSRF).

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

Yes

Document Name

Comment

EEl supports the removal of the Technical Rationale (TR) from EOP-008-2, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:

• Project Number under which the Technical Rationale was originally developed

• Date the Technical Rationale was originally developed

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer

Yes

Document Name

Comment

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

Response**Daniel Gacek - Exelon - 1**

Answer

Yes

Document Name

Comment

Exelon concurs with the comments submitted by EEI.

Submitted on behalf of Exelon for Segments 1, 3, 5, and 6.

Likes 0

Dislikes 0

Response**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Answer

Yes

Document Name

Comment

A direct link to the rationale information placed in the standard would make the information much easier to access.

Likes 0

Dislikes 0

Response**Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy**

Answer

Yes

Document Name

Comment

See Question #1 Comments.

Likes 0

Dislikes 0

Response

Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE

Answer

Yes

Document Name

Comment

Oklahoma Gas & Electric supports Edison Electric Institute's (EEI) response.

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

No Comments.

Likes 0

Dislikes 0

Response

Teresa Cantwell - Lower Colorado River Authority - 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

Colleen Campbell - AES - Indianapolis Power and Light Co. - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michelle Amaranos - Michelle Amaranos	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Neil Shockey - Edison International - Southern California Edison Company - 5

Answer

Document Name

Comment

Please see comments submitted by Edison Electric Institute.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

3. NUC-001-3: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Kjersti Drott - Tri-State G and T Association, Inc. - 1

Answer No

Document Name

Comment

Tri-State prefers the Guidance and Technical Basis (GTB) continue to be included in the same process as standards development. Specifically, we would like to see the GTB continue to be developed at the same time as the standard, and posted for comment at the same time as the standard. Without these documents combined, what assurance does industry have that they will be developed in tandem and posted for industry comment in tandem? The primary reason is to allow entities to comment on the GTB during the drafting of the standard. For example, the Virtualization project has extensive Technical Rationale which Tri-State has used as a basis for understanding the changes and for making comments on the standards under development.

Likes 0

Dislikes 0

Response

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Salt River Project (SRP) sees this as an administrative task that does not add to the reliability of the Bulk Electric System. Separating out the Guidelines and technical rationale into separate documents would require the tracking of these documents for updates. SRP also has process documentation that references the GTB sections of the standard that would need to be updated to reference the new documents. SRP also likes the GTB within the standards so they may be reviewed when there is a revision to the standard.

Likes 0

Dislikes 0

Response

Jeanne Kurzynowski - Consumers Energy Company - 1,3,4,5 - RF

Answer No

Document Name

Comment

We prefer to have the rationale retained with the standard. We refer to it for help to explain the meaning and intent of the current standard. Keeping the related information with the standard saves additional searching for the information.

Likes 0

Dislikes 0

Response

Kevin Salsbury - Berkshire Hathaway - NV Energy - 5

Answer

No

Document Name

Comment

NV Energy supports and agrees with EEI's comments on the removal of the Technical Rationale from BAL-005-1, and disagreement with the manner and method this is being done. For these reasons, we ask NERC to add the following information to provide needed context in the new Technical Rationale document to ensure proper linkage between the Standard and this new document:

- • Project Number under which the Technical Rationale was developed
- • Date the Technical Rationale was originally developed
- • Hyperlink to the Project Page
- • Date the Reliability Standard was approved
- • Hyperlink to the Standard

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5

Answer

No

Document Name

Comment

The entire **Technical Rationale for Reliability Standards Project** is an inefficient and unnecessary administrative task that undermines the value of the Industry vetted and FERC approved Reliability Standards.

This project adds zero value to the reliability of the BES, at what expense? This project creates more confusion, not less; more paperwork, not less; several more Balloting and Commenting events, not less; consumes more staff time, money and resources for NERC, Regional Entities, and Registered Entities, not less.

The end product, after the estimated five or more years this project will take, will be yet more NERC documents for each Reliability Standard and zero Reliability improvement to the BES.

NCPA also support comments by Salt-River Project, Tacoma Power, and Tri-State related to this second posting of the subject project.

Likes 0

Dislikes 0

Response

Michael Whitney - Northern California Power Agency - 3

Answer

No

Document Name

Comment

See Response to Question 1

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer

No

Document Name

Comment

In general, Reclamation recommends GTB and Rationale should be kept in their current format within each standard. Reclamation recommends that the content of GTB and Rationale can be revised to provide experience gained (similar to lessons learned) from implementing and using the standards. Technical basis can be beneficial for implementing and understanding the requirements of the standards. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.

Reclamation acknowledges that NUC-001-3 does not have a GTB and asserts the Rationale appears to be more of a version history containing a list of errata changes or other information that should properly be contained in the "Background" section of the standard. In this situation, Reclamation recommends the irrelevant parts of the existing Rationale be deleted or the pertinent parts moved to the Background section of the standard.

Reclamation recommends standards should not be revised simply for the sake of revising the format. Standards should be revised only when the content needs to be updated. Any changes to format should be incorporated at the time of content revisions. If GTB and Rationale must be removed from their standards, Reclamation recommends NERC publish GTB and Rationale in a "book" type aggregation to facilitate ease of locating the information.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

Please see Response to Question 1

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

No Comments.

Likes 0

Dislikes 0

Response

Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE

Answer Yes

Document Name

Comment

Oklahoma Gas & Electric supports Edison Electric Institute's (EEI) response.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

See Question #1 Comments.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon concurs with the comments submitted by EEI.

Submitted on behalf of Exelon for Segments 1, 3, 5, and 6.

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer	Yes
Document Name	
Comment	
<p>EEl supports the removal of the Technical Rationale (TR) from NUC-001-3, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:</p> <ul style="list-style-type: none"> &bull; Project Number under which the Technical Rationale was originally developed &bull; Date the Technical Rational was originally developed 	
Likes 0	
Dislikes 0	
Response	
<p>Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 1, 6, 5, 3; Derek Brown, Westar Energy, 1, 6, 5, 3; James McBee, Westar Energy, 1, 6, 5, 3; Marcus Moor, Westar Energy, 1, 6, 5, 3; - Douglas Webb, Group Name Westar-KCPL</p>	
Answer	Yes
Document Name	
Comment	
<p>Energy (Westar Energy) incorporates by reference and supports the response of Edison Electric Institute and the response of MRO NERC Standards Review Forum (MRO NSRF).</p>	
Likes 0	
Dislikes 0	
Response	
<p>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee</p>	
Answer	Yes
Document Name	
Comment	
<p>Please consider revising the standard page numbering since the standard will have fewer pages. Please consider revising the Technical Rationale page numbering (Example: 1 of X number of pages.)</p>	
Likes 0	

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

As stated by EEI:

EEI supports the removal of the Technical Rationale (TR) from NUC-001-3, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:

• Project Number under which the Technical Rationale was originally developed

• Date the Technical Rational was originally developed

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2020

Answer Yes

Document Name

Comment

Consider defining acronyms upon first use since this will be a stand-alone document.

If the NUC FYRT recommendations were implemented in the Reliability Standard, then the recommendations do not need to be repeated in the Technical Rationale. If the rationale on why the recommendations were implemented was added or elaborated upon, then that would be appropriate for the Technical Rationale.

Project 2010-05.2 has been implemented; this sentence should be rephrased: "Project 2010-05.2 has proposed to replace SPS with RAS throughout all of the NERC Standards in order to move to the use of a single term."

Background Section 5 should be moved to the Technical Rationale. It explains the formation of the "NUC FYRT" and the dates the recommendations were accepted. This is not essential standards information but is more useful in understanding the reference cases in the Technical Rationale that have been moved out of the standard.

Furthermore, if NERC is creating a "reliability standard template" that would apply to the entire suite of Reliability Standards, the IRC suggests that the "Background" section be standardized, perhaps including a link the Project Page for that standard or references to an applicable FERC

docket. However, not all of the Reliability Standards include a "Background" section, so another alternative would be to remove the Background section and include the discussion there in the Technical Rationale document.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer

Yes

Document Name

Comment

California ISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee.

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - Michelle Amarantos

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colleen Campbell - AES - Indianapolis Power and Light Co. - 3

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

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Judianne O'Brien - Judianne O'Brien On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Judianne O'Brien

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Neil Shockey - Edison International - Southern California Edison Company - 5

Answer

Document Name

Comment

Please see comments submitted by Edison Electric Institute.

Likes 0

Dislikes 0

Response

Teresa Cantwell - Lower Colorado River Authority - 5

Answer

Document Name

Comment

N/A - No opinion.

Likes 0

Dislikes 0

Response

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

Answer	
Document Name	
Comment	
Not applicable to Minnesota Power.	
Likes 0	
Dislikes 0	
Response	

4. TOP-002-4: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

Please see Response to Question 1

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer No

Document Name

Comment

In general, Reclamation recommends GTB and Rationale should be kept in their current format within each standard. Reclamation recommends that the content of GTB and Rationale can be revised to provide experience gained (similar to lessons learned) from implementing and using the standards. Technical basis can be beneficial for implementing and understanding the requirements of the standards. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.

Reclamation asserts that TOP-002-4 GTB and Rationale do not provide useful information except for the rationale related to definitions. In this situation, Reclamation recommends the irrelevant parts of the existing GTB and Rationale be deleted or the pertinent parts moved to the Background section of the standard.

Reclamation recommends standards should not be revised simply for the sake of revising the format. Standards should be revised only when the content needs to be updated. Any changes to format should be incorporated at the time of content revisions. If GTB and Rationale must be removed from their standards, Reclamation recommends NERC publish GTB and Rationale in a "book" type aggregation to facilitate ease of locating the information.

Likes 0

Dislikes 0

Response

Michael Whitney - Northern California Power Agency - 3

Answer	No
Document Name	
Comment	
See Response to Question 1	
Likes 0	
Dislikes 0	
Response	
Marty Hostler - Northern California Power Agency - 5	
Answer	No
Document Name	
Comment	
<p>The entire Technical Rationale for Reliability Standards Project is an inefficient and unnecessary administrative task that undermines the value of the Industry vetted and FERC approved Reliability Standards.</p> <p>This project adds zero value to the reliability of the BES, at what expense? This project creates more confusion, not less; more paperwork, not less; several more Balloting and Commenting events, not less; consumes more staff time, money and resources for NERC, Regional Entities, and Registered Entities, not less.</p> <p>The end product, after the estimated five or more years this project will take, will be yet more NERC documents for each Reliability Standard and zero Reliability improvement to the BES.</p> <p>NCPA also support comments by Salt-River Project, Tacoma Power, and Tri-State related to this second posting of the subject project.</p>	
Likes 0	
Dislikes 0	
Response	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	No
Document Name	
Comment	
<p>NV Energy supports and agrees with EEI's comments on the removal of the Technical Rationale from BAL-005-1, and disagreement with the manner and method this is being done. For these reasons, we ask NERC to add the following information to provide needed context in the new Technical Rationale document to ensure proper linkage between the Standard and this new document:</p>	

- Project Number under which the Technical Rationale was developed
- Date the Technical Rationale was originally developed
- Hyperlink to the Project Page
- Date the Reliability Standard was approved
- Hyperlink to the Standard

Likes 0

Dislikes 0

Response

Jeanne Kurzynowski - Consumers Energy Company - 1,3,4,5 - RF

Answer No

Document Name

Comment

We prefer to have the rationale retained with the standard. We refer to it for help to explain the meaning and intent of the current standard. Keeping the related information with the standard saves additional searching for the information.

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike

Answer No

Document Name

Comment

The GTB sections within the Standards provide background information and context for the Requirements and Measures, often helping interpret what is found in the Standards. Removal of this section results in less structure with interpretation of the Standards. Tacoma Power would prefer that the GTB section remain in the Standard, but if the GTB section is to be ultimately transitioned to a separate Technical Rationale document, it is requested that hyperlink references be provided within the Standard and the applicable Technical Rationale documents in order to maintain continuity.

Likes 0

Dislikes 0

Response

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Salt River Project (SRP) sees this as an administrative task that does not add to the reliability of the Bulk Electric System. Separating out the Guidelines and technical rational into separate documents would require the tracking of these documents for updates. SRP also has process documentation that references the GTB sections of the standard that would need to be updated to reference the new documents. SRP also likes the GTB within the standards so they may be reviewed when there is a revision to the standard.

Likes 0

Dislikes 0

Response

Kjersti Drott - Tri-State G and T Association, Inc. - 1

Answer No

Document Name

Comment

Tri-State prefers the Guidance and Technical Basis (GTB) continue to be included in the same process as standards development. Specifically, we would like to see the GTB continue to be developed at the same time as the standard, and posted for comment at the same time as the standard. Without these documents combined, what assurance does industry have that they will be developed in tandem and posted for industry comment in tandem? The primary reason is to allow entities to comment on the GTB during the drafting of the standard. For example, the Virtualization project has extensive Technical Rationale which Tri-State has used as a basis for understanding the changes and for making comments on the standards under development.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer Yes

Document Name

Comment

California ISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2020

Answer Yes

Document Name

Comment

TOP-001-4 is the currently effective version, so this sentence can be rephrased: "The change to Requirement R2 is in response to NOPR paragraph 42 and in concert with proposed changes made to proposed TOP-001-4."

For the changes made in response to IERP recommendation, it would be helpful to have the reason why the recommendation was made in the Technical Rationale document than just the statement on who made the recommendation.

In addition, since the technical rationale is a separate document it would be beneficial to provide a link to the NOPR or the docket number that would make it easier for the reader to look more closely at the NOPR if desired.

Recommend defining acronyms upon first use since this will be a stand-alone document.

Recommend adding what the SW Outage Report Recommendation was and why it was made rather than just referring to it as the reason for the change and providing no explanation as to the reason.

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

As stated by EEI:

EEI supports the removal of the Technical Rationale (TR) from TOP-002-4, however, we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:

• Project Number under which the Technical Rationale was originally developed

• Date the Technical Rationale was originally developed

In addition to the above information, EEI ask NERC to reference the NOPR cited in this TR. While it is currently identified within the revision history of the associated Reliability Standard, the TR is now a stand-alone document and should contain a reference to any document prominently cited within the TR.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee

Answer

Yes

Document Name

Comment

Please consider revising the standard page numbering since the standard will have fewer pages. Please consider revising the Technical Rationale page numbering (Example: 1 of X number of pages.)

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 1, 6, 5, 3; Derek Brown, Westar Energy, 1, 6, 5, 3; James McBee, Westar Energy, 1, 6, 5, 3; Marcus Moor, Westar Energy, 1, 6, 5, 3; - Douglas Webb, Group Name Westar-KCPL

Answer

Yes

Document Name

Comment

Energy (Westar Energy) incorporates by reference and supports the response of Edison Electric Institute and the response of MRO NERC Standards Review Forum (MRO NSRF).

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

Yes

Document Name

Comment

EEl supports the removal of the Technical Rationale (TR) from TOP-002-4, however, we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:

- Project Number under which the Technical Rationale was originally developed

- Date the Technical Rationale was originally developed

Likes 0

Dislikes 0

Response**David Jendras - Ameren - Ameren Services - 3****Answer**

Yes

Document Name**Comment**

Ameren agrees with and supports EEl comments.

Likes 0

Dislikes 0

Response**Daniel Gacek - Exelon - 1****Answer**

Yes

Document Name**Comment**

Exelon concurs with the comments submitted by EEl.

Submitted on behalf of Exelon for Segments 1, 3, 5, and 6.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer	Yes
Document Name	
Comment	
See Question #1 Comments.	
Likes 0	
Dislikes 0	
Response	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Oklahoma Gas & Electric supports Edison Electric Institute's (EEI) response.	
Likes 0	
Dislikes 0	
Response	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
No Comments.	
Likes 0	
Dislikes 0	
Response	
Glenn Barry - Los Angeles Department of Water and Power - 5	
Answer	Yes
Document Name	

Comment

Likes 0

Dislikes 0

Response

Teresa Cantwell - Lower Colorado River Authority - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

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

Colleen Campbell - AES - Indianapolis Power and Light Co. - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - Michelle Amarantos

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Neil Shockey - Edison International - Southern California Edison Company - 5

Answer

Document Name

Comment

Please see comments submitted by Edison Electric Institute.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

5. TOP-003-3: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Kjersti Drott - Tri-State G and T Association, Inc. - 1

Answer No

Document Name

Comment

Tri-State prefers the Guidance and Technical Basis (GTB) continue to be included in the same process as standards development. Specifically, we would like to see the GTB continue to be developed at the same time as the standard, and posted for comment at the same time as the standard. Without these documents combined, what assurance does industry have that they will be developed in tandem and posted for industry comment in tandem? The primary reason is to allow entities to comment on the GTB during the drafting of the standard. For example, the Virtualization project has extensive Technical Rationale which Tri-State has used as a basis for understanding the changes and for making comments on the standards under development.

Likes 0

Dislikes 0

Response

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Salt River Project (SRP) sees this as an administrative task that does not add to the reliability of the Bulk Electric System. Separating out the Guidelines and technical rational into separate documents would require the tracking of these documents for updates. SRP also has process documentation that references the GTB sections of the standard that would need to be updated to reference the new documents. SRP also likes the GTB within the standards so they may be reviewed when there is a revision to the standard.

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike

Answer No

Document Name**Comment**

The GTB sections within the Standards provide background information and context for the Requirements and Measures, often helping interpret what is found in the Standards. Removal of this section results in less structure with interpretation of the Standards. Tacoma Power would prefer that the GTB section remain in the Standard, but if the GTB section is to be ultimately transitioned to a separate Technical Rationale document, it is requested that hyperlink references be provided within the Standard and the applicable Technical Rationale documents in order to maintain continuity.

Likes 0

Dislikes 0

Response**Jeanne Kurzynowski - Consumers Energy Company - 1,3,4,5 - RF****Answer**

No

Document Name**Comment**

We prefer to have the rational retained with the standard. We refer to it for help to explain the meaning and intent of the current standard. Keeping the related information with the standard saves additional searching for the information.

Likes 0

Dislikes 0

Response**Kevin Salsbury - Berkshire Hathaway - NV Energy - 5****Answer**

No

Document Name**Comment**

NV Energy supports and agrees with EEI's comments on the removal of the Technical Rationale from BAL-005-1, and disagreement with the manner and method this is being done. For these reasons, we ask NERC to add the following information to provide needed context in the new Technical Rationale document to ensure proper linkage between the Standard and this new document:

- • Project Number under which the Technical Rationale was developed
- • Date the Technical Rational was originally developed
- • Hyperlink to the Project Page
- • Date the Reliability Standard was approved

• [Hyperlink to the Standard](#)

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5

Answer

No

Document Name

Comment

The entire **Technical Rationale for Reliability Standards Project** is an inefficient and unnecessary administrative task that undermines the value of the Industry vetted and FERC approved Reliability Standards.

This project adds zero value to the reliability of the BES, at what expense? This project creates more confusion, not less; more paperwork, not less; several more Balloting and Commenting events, not less; consumes more staff time, money and resources for NERC, Regional Entities, and Registered Entities, not less.

The end product, after the estimated five or more years this project will take, will be yet more NERC documents for each Reliability Standard and zero Reliability improvement to the BES.

NCPA also support comments by Salt-River Project, Tacoma Power, and Tri-State related to this second posting of the subject project.

Likes 0

Dislikes 0

Response

Michael Whitney - Northern California Power Agency - 3

Answer

No

Document Name

Comment

See Response to Question 1

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer	No
Document Name	
Comment	
<p>In general, Reclamation recommends GTB should be kept in their current format within each standard. Reclamation recommends that the content of GTB can be revised to provide experience gained (similar to lessons learned) from implementing and using the standards. Technical basis can be beneficial for implementing and understanding the requirements of the standards. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.</p> <p>Reclamation asserts that TOP-003-3 GTB and Rationale do not provide useful information except for the rationale related to definitions. In this situation, Reclamation recommends the irrelevant parts of the existing GTB and Rationale be deleted or the pertinent parts moved to the Background section of the standard.</p> <p>Reclamation recommends standards should not be revised simply for the sake of revising the format. Standards should be revised only when the content needs to be updated. Any changes to format should be incorporated at the time of content revisions. If GTB and Rationale must be removed from their standards, Reclamation recommends NERC publish GTB and Rationale in a “book” type aggregation to facilitate ease of locating the information.</p>	
Likes	0
Dislikes	0
Response	
Dennis Sismaet - Northern California Power Agency - 6	
Answer	No
Document Name	
Comment	
Please see Response to Question 1	
Likes	0
Dislikes	0
Response	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
No Comments.	

Likes 0

Dislikes 0

Response

Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE

Answer

Yes

Document Name

Comment

Oklahoma Gas & Electric supports Edison Electric Institute's (EEI) response.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

See Question #1 Comments.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Yes

Document Name

Comment

Exelon concurs with the comments submitted by EEI.

Submitted on behalf of Exelon for Segments 1, 3, 5, and 6.

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EEI supports the removal of the Technical Rationale (TR) from TOP-003-3, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:

• Project Number under which the Technical Rationale was originally developed

• Date the Technical Rational was originally developed

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 1, 6, 5, 3; Derek Brown, Westar Energy, 1, 6, 5, 3; James McBee, Westar Energy, 1, 6, 5, 3; Marcus Moor, Westar Energy, 1, 6, 5, 3; - Douglas Webb, Group Name Westar-KCPL

Answer Yes

Document Name

Comment

Evergy (Westar Energy) incorporates by reference and supports the response of Edison Electric Institute and the response of MRO NERC Standards Review Forum (MRO NSRF).

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee

Answer

Yes

Document Name

Comment

Please consider revising the standard page numbering since the standard will have fewer pages. Please consider revising the Technical Rationale page numbering (Example: 1 of X number of pages.)

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Yes

Document Name

Comment

As stated by EEI:

EEI supports the removal of the Technical Rationale (TR) from TOP-003-3, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:

- • Project Number under which the Technical Rationale was originally developed
- • Date the Technical Rationale was originally developed

In addition to the above information, EEI ask NERC to reference the NOPR cited in this TR. While it is currently identified within the revision history of the associated Reliability Standard, the TR is now a stand-alone document and should contain a reference to any document prominently cited within the TR.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2020

Answer Yes

Document Name

Comment

References to “proposed” should be removed now that the version is effective.

Recommend defining acronyms upon first use since this will be a stand-alone document.

Recommend providing detail regarding the NOPR referenced in the Technical Rationale such as the Docket Number and a brief description as to the recommendations from the NOPR paragraphs that were cited.

Recommend adding the SW Outage Report recommendation 27 text so the Technical Rationale can be a stand-alone document. A link to where to obtain the document should also be included in the Technical Rationale.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Minnesota Power agrees that the use of the term “guideline” in the GTB section can create confusion while developing compliance approaches. If the intent of this section is to explain the technical basis for the Standard and provide technical guidance and not to provide compliance examples or compliance language, then separating it from the Standard will address this. Creating separate documents for Technical Rationale and Implementation Guidance will be helpful to further clarify the distinction between the two.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer	Yes
Document Name	
Comment	
California ISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee.	
Likes 0	
Dislikes 0	
Response	
Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michelle Amaranos - Michelle Amaranos	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Colleen Campbell - AES - Indianapolis Power and Light Co. - 3	
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	
Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Teresa Cantwell - Lower Colorado River Authority - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glenn Barry - Los Angeles Department of Water and Power - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Neil Shockey - Edison International - Southern California Edison Company - 5

Answer

Document Name

Comment

Please see comments submitted by Edison Electric Institute.

Likes 0

Dislikes 0

Response

6. TOP-010-1(i): Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

Please see Response to Question 1

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer No

Document Name

Comment

In general, Reclamation recommends GTB should be kept in their current format within each standard. Reclamation recommends that the content of GTB can be revised to provide experience gained (similar to lessons learned) from implementing and using the standards. Technical basis can be beneficial for implementing and understanding the requirements of the standards. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.

Reclamation asserts that TOP-010-1(i) GTB and Rationale provide useful information. In this situation, Reclamation recommends the Supplemental Material section be retained.

Reclamation recommends standards should not be revised simply for the sake of revising the format. Standards should be revised only when the content needs to be updated. Any changes to format should be incorporated at the time of content revisions. If GTB and Rationale must be removed from their standards, Reclamation recommends NERC publish GTB and Rationale in a "book" type aggregation to facilitate ease of locating the information.

Likes 0

Dislikes 0

Response

Michael Whitney - Northern California Power Agency - 3

Answer No

Document Name	
Comment	
See Response to Question 1	
Likes 0	
Dislikes 0	
Response	
Marty Hostler - Northern California Power Agency - 5	
Answer	No
Document Name	
Comment	
<p>The entire Technical Rationale for Reliability Standards Project is an inefficient and unnecessary administrative task that undermines the value of the Industry vetted and FERC approved Reliability Standards.</p> <p>This project adds zero value to the reliability of the BES, at what expense? This project creates more confusion, not less; more paperwork, not less; several more Balloting and Commenting events, not less; consumes more staff time, money and resources for NERC, Regional Entities, and Registered Entities, not less.</p> <p>The end product, after the estimated five or more years this project will take, will be yet more NERC documents for each Reliability Standard and zero Reliability improvement to the BES.</p> <p>NCPA also support comments by Salt-River Project, Tacoma Power, and Tri-State related to this second posting of the subject project.</p>	
Likes 0	
Dislikes 0	
Response	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	No
Document Name	
Comment	
<p>NV Energy supports and agrees with EEI's comments on the removal of the Technical Rationale from BAL-005-1, and disagreement with the manner and method this is being done. For these reasons, we ask NERC to add the following information to provide needed context in the new Technical Rationale document to ensure proper linkage between the Standard and this new document:</p> <ul style="list-style-type: none"> Project Number under which the Technical Rationale was developed 	

- • Date the Technical Rational was originally developed
- • Hyperlink to the Project Page
- • Date the Reliability Standard was approved
- • Hyperlink to the Standard

Likes 0

Dislikes 0

Response

Jeanne Kurzynowski - Consumers Energy Company - 1,3,4,5 - RF

Answer No

Document Name

Comment

We prefer to have the rational retained with the standard. We refer to it for help to explain the meaning and intent of the current standard. Keeping the related information with the standard saves additional searching for the information.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer No

Document Name

Comment

Texas RE noticed the Guidelines and Technical Basis provide examples of how to comply with the standard and should be considered for Implementation Guidance. For example, in the following excerpt, only the first sentence is rationale. The bold portion reads like implementation guidance: "Requirement R3 ensures TOPs have procedures to address issues related to the quality of the analysis results used for Real-time Assessments. Requirements to perform Real-time Assessments appear in other Reliability Standards. **Examples of the types of analysis used in Real-time Assessments may include, as applicable, state estimation, Real-time Contingency analysis, Stability analysis or other studies used for Real-time Assessments. Examples of the types of criteria used to evaluate the quality of analysis used in Real-time Assessments may include solution tolerances, mismatches with Real-time data, convergences, etc. The Operating Process or Operating Procedure must describe how the quality of analysis results used in Real-time Assessment will be shown to operating personnel.**"

Another example is in Requirement R4. The following statements are implementation guidance: "**An alarm process monitor could be an application within a Real-time monitoring system or it could be a separate system. 'Heartbeat' or 'watchdog' monitors are examples of an alarm process**

monitor. An alarm process monitor should be designed and implemented such that a stall of the Real-time monitoring alarm processor does not cause a failure of the alarm process monitor."

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike

Answer

No

Document Name

Comment

The GTB sections within the Standards provide background information and context for the Requirements and Measures, often helping interpret what is found in the Standards. Removal of this section results in less structure with interpretation of the Standards. Tacoma Power would prefer that the GTB section remain in the Standard, but if the GTB section is to be ultimately transitioned to a separate Technical Rationale document, it is requested that hyperlink references be provided within the Standard and the applicable Technical Rationale documents in order to maintain continuity.

Likes 0

Dislikes 0

Response

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

Salt River Project (SRP) sees this as an administrative task that does not add to the reliability of the Bulk Electric System. Separating out the Guidelines and technical rationale into separate documents would require the tracking of these documents for updates. SRP also has process documentation that references the GTB sections of the standard that would need to be updated to reference the new documents. SRP also likes the GTB within the standards so they may be reviewed when there is a revision to the standard.

Likes 0

Dislikes 0

Response

Kjersti Drott - Tri-State G and T Association, Inc. - 1

Answer	No
Document Name	
Comment	
<p>Tri-State prefers the Guidance and Technical Basis (GTB) continue to be included in the same process as standards development. Specifically, we would like to see the GTB continue to be developed at the same time as the standard, and posted for comment at the same time as the standard. Without these documents combined, what assurance does industry have that they will be developed in tandem and posted for industry comment in tandem? The primary reason is to allow entities to comment on the GTB during the drafting of the standard. For example, the Virtualization project has extensive Technical Rationale which Tri-State has used as a basis for understanding the changes and for making comments on the standards under development.</p>	
Likes 0	
Dislikes 0	
Response	
Jamie Johnson - California ISO - 2	
Answer	Yes
Document Name	
Comment	
<p>California ISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee.</p>	
Likes 0	
Dislikes 0	
Response	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
<p>Minnesota Power agrees that the use of the term “guideline” in the GTB section can create confusion while developing compliance approaches. If the intent of this section is to explain the technical basis for the Standard and provide technical guidance and not to provide compliance examples or compliance language, then separating it from the Standard will address this. Creating separate documents for Technical Rationale and Implementation Guidance will be helpful to further clarify the distinction between the two.</p>	
Likes 0	
Dislikes 0	

Response	
Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2020	
Answer	Yes
Document Name	
Comment	
<p>This is an instance where confusion may be created on the use of the information in the GTB section since it may be used by entities to develop compliance approaches to meet the requirements.</p> <p>Consideration should be given if the information in the GTB section can be incorporated in the existing Compliance Implementation Guidance Real-time Assessment Quality of Analysis where the purpose of this guidance document is to assist NERC registered entities in establishing a common understanding of the practices and processes surrounding the quality of analysis used in completion of a Real-time Assessment as applied in NERC Standard TOP-010-1(i).</p>	
Likes	0
Dislikes	0
Response	
Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
<p>As stated by EEI:</p> <p>EEI supports the removal of the Technical Rationale (TR) from TOP-010-1(i), however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:</p> <ul style="list-style-type: none"> &bull; Project Number under which the Technical Rationale was originally developed &bull; Date the Technical Rationale was originally developed 	
Likes	0
Dislikes	0
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee	
Answer	Yes

Document Name**Comment**

Please consider revising the standard page numbering since the standard will have fewer pages. Please consider revising the Technical Rationale page numbering (Example: 1 of X number of pages.)

This is an instance where confusion may be created on the use of the information in the GTB section since it may be used by entities to develop compliance approaches to meet the requirements.

Because there is existing compliance implementation guidance for Real-time Assessment Quality of Analysis([link](#)), consideration should be given to incorporating the material in the standard to the existing guidance document to enable NERC registered entities in establishing a common understanding of the practices and processes surrounding the quality of Real-time Assessment analysis expected to be used for meeting NERC Standard TOP-010-1(i).

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 1, 6, 5, 3; Derek Brown, Westar Energy, 1, 6, 5, 3; James McBee, Westar Energy, 1, 6, 5, 3; Marcus Moor, Westar Energy, 1, 6, 5, 3; - Douglas Webb, Group Name Westar-KCPL

Answer

Yes

Document Name**Comment**

Evergy (Westar Energy) incorporates by reference and supports the response of Edison Electric Institute and the response of MRO NERC Standards Review Forum (MRO NSRF).

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

Yes

Document Name**Comment**

EEl supports the removal of the Technical Rationale (TR) from TOP-010-1(i), however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:

- Project Number under which the Technical Rationale was originally developed
- Date the Technical Rationale was originally developed

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer

Yes

Document Name

Comment

Ameren agrees with and supports EEl comments.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Yes

Document Name

Comment

Exelon concurs with the comments submitted by EEl.

Submitted on behalf of Exelon for Segments 1, 3, 5, and 6.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

See Question #1 Comments.

Likes 0

Dislikes 0

Response

Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE

Answer Yes

Document Name

Comment

Oklahoma Gas & Electric supports Edison Electric Institute's (EEI) response.

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

This is an instance where confusion may be created on the use of the information in the GTB section since it may be used by entities to develop compliance approaches to meet the requirements.

Consideration should be given if the information in the GTB section can be incorporated in the existing Compliance Implementation Guidance Real-time Assessment Quality of Analysis where the purpose of this guidance document is to assist NERC registered entities in establishing a common understanding of the practices and processes surrounding the quality of analysis used in completion of a Real-time Assessment as applied in NERC Standard TOP-010-1(i).

Likes 0

Dislikes 0

Response

Glenn Barry - Los Angeles Department of Water and Power - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Cantwell - Lower Colorado River Authority - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colleen Campbell - AES - Indianapolis Power and Light Co. - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amaranos - Michelle Amaranos

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Neil Shockey - Edison International - Southern California Edison Company - 5

Answer

Document Name

Comment

Please see comments submitted by Edison Electric Institute.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Qu?bec Production - 5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

7. PRC-005-6: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Kjersti Drott - Tri-State G and T Association, Inc. - 1

Answer No

Document Name

Comment

Tri-State prefers the Guidance and Technical Basis (GTB) continue to be included in the same process as standards development. Specifically, we would like to see the GTB continue to be developed at the same time as the standard, and posted for comment at the same time as the standard. Without these documents combined, what assurance does industry have that they will be developed in tandem and posted for industry comment in tandem? The primary reason is to allow entities to comment on the GTB during the drafting of the standard. For example, the Virtualization project has extensive Technical Rationale which Tri-State has used as a basis for understanding the changes and for making comments on the standards under development.

Likes 0

Dislikes 0

Response

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Salt River Project (SRP) sees this as an administrative task that does not add to the reliability of the Bulk Electric System. Separating out the Guidelines and technical rational into separate documents would require the tracking of these documents for updates. SRP also has process documentation that references the GTB sections of the standard that would need to be updated to reference the new documents. SRP also likes the GTB within the standards so they may be reviewed when there is a revision to the standard.

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike

Answer No

Document Name**Comment**

The GTB sections within the Standards provide background information and context for the Requirements and Measures, often helping interpret what is found in the Standards. Removal of this section results in less structure with interpretation of the Standards. Tacoma Power would prefer that the GTB section remain in the Standard, but if the GTB section is to be ultimately transitioned to a separate Technical Rationale document, it is requested that hyperlink references be provided within the Standard and the applicable Technical Rationale documents in order to maintain continuity.

Likes 0

Dislikes 0

Response**Jeanne Kurzynowski - Consumers Energy Company - 1,3,4,5 - RF****Answer**

No

Document Name**Comment**

We prefer to have the rational retained with the standard. We refer to it for help to explain the meaning and intent of the current standard. Keeping the related information with the standard saves additional searching for the information.

Likes 0

Dislikes 0

Response**Kevin Salsbury - Berkshire Hathaway - NV Energy - 5****Answer**

No

Document Name**Comment**

NV Energy supports and agrees with EEI's comments on the removal of the Technical Rationale from BAL-005-1, and disagreement with the manner and method this is being done. For these reasons, we ask NERC to add the following information to provide needed context in the new Technical Rationale document to ensure proper linkage between the Standard and this new document:

- • Project Number under which the Technical Rationale was developed
- • Date the Technical Rational was originally developed
- • Hyperlink to the Project Page
- • Date the Reliability Standard was approved

• [Hyperlink to the Standard](#)

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5

Answer

No

Document Name

Comment

The entire **Technical Rationale for Reliability Standards Project** is an inefficient and unnecessary administrative task that undermines the value of the Industry vetted and FERC approved Reliability Standards.

This project adds zero value to the reliability of the BES, at what expense? This project creates more confusion, not less; more paperwork, not less; several more Balloting and Commenting events, not less; consumes more staff time, money and resources for NERC, Regional Entities, and Registered Entities, not less.

The end product, after the estimated five or more years this project will take, will be yet more NERC documents for each Reliability Standard and zero Reliability improvement to the BES.

NCPA also support comments by Salt-River Project, Tacoma Power, and Tri-State related to this second posting of the subject project.

Likes 0

Dislikes 0

Response

Michael Whitney - Northern California Power Agency - 3

Answer

No

Document Name

Comment

See Response to Question 1

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer	No
Document Name	
Comment	
<p>In general, Reclamation recommends GTB and Rationale should be kept in their current format within each standard. Reclamation recommends that the content of GTB and Rationale can be revised to provide experience gained (similar to lessons learned) from implementing and using the standards. Technical basis can be beneficial for implementing and understanding the requirements of the standards. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.</p> <p>Reclamation acknowledges that PRC-005-6 does not have a GTB and asserts the Rationale appears to be more of a version history containing a list of errata changes or other information that should properly be contained in the "Background" section of the standard. In this situation, Reclamation recommends the irrelevant parts of the existing Rationale be deleted or the pertinent parts moved to the Background section of the standard.</p> <p>Reclamation recommends standards should not be revised simply for the sake of revising the format. Standards should be revised only when the content needs to be updated. Any changes to format should be incorporated at the time of content revisions. If GTB and Rationale must be removed from their standards, Reclamation recommends NERC publish GTB and Rationale in a "book" type aggregation to facilitate ease of locating the information.</p>	
Likes 0	
Dislikes 0	
Response	
Dennis Sismaet - Northern California Power Agency - 6	
Answer	No
Document Name	
Comment	
Please see Response to Question 1	
Likes 0	
Dislikes 0	
Response	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
No Comments.	

Likes 0

Dislikes 0

Response

Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE

Answer

Yes

Document Name

Comment

Oklahoma Gas & Electric supports Edison Electric Institute's (EEI) response.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

See Question #1 Comments.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Yes

Document Name

Comment

Exelon concurs with the comments submitted by EEI.

Submitted on behalf of Exelon for Segments 1, 3, 5, and 6.

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EEI supports the removal of the Technical Rationale (TR) from PRC-005-6, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:

• Project Number under which the Technical Rationale was originally developed

• Date the Technical Rational was originally developed

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 1, 6, 5, 3; Derek Brown, Westar Energy, 1, 6, 5, 3; James McBee, Westar Energy, 1, 6, 5, 3; Marcus Moor, Westar Energy, 1, 6, 5, 3; - Douglas Webb, Group Name Westar-KCPL

Answer Yes

Document Name

Comment

Evergy (Westar Energy) incorporates by reference and supports the response of Edison Electric Institute and the response of MRO NERC Standards Review Forum (MRO NSRF).

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee

Answer

Yes

Document Name

Comment

Please consider revising the standard page numbering since the standard will have fewer pages. Please consider revising the Technical Rationale page numbering (Example: 1 of X number of pages.)

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Yes

Document Name

Comment

As stated by EEI:

EEI supports the removal of the Technical Rationale (TR) from PRC-005-6, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:

- • Project Number under which the Technical Rationale was originally developed
- • Date the Technical Rationale was originally developed

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2020

Answer Yes

Document Name

Comment

Recommend adding to the Rationale for Revisions for Component Type the reason for adding additional elements to the definition of "Automatic Reclosing" rather than stating only that the elements increased.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer Yes

Document Name

Comment

California ISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee.

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michelle Amaranos - Michelle Amaranos	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colleen Campbell - AES - Indianapolis Power and Light Co. - 3

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	
Christopher Searles - Small User - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Teresa Cantwell - Lower Colorado River Authority - 5	
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	
Neil Shockey - Edison International - Southern California Edison Company - 5	
Answer	
Document Name	
Comment	
Please see comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	

8. PRC-006-3: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

Please see Response to Question 1

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer No

Document Name

Comment

In general, Reclamation recommends GTB and Rationale should be kept in their current format within each standard. Reclamation recommends that the content of GTB and Rationale can be revised to provide experience gained (similar to lessons learned) from implementing and using the standards. Technical basis can be beneficial for implementing and understanding the requirements of the standards. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.

Reclamation acknowledges that PRC-006-3 does not have a GTB and asserts the Rationale appears to be more of a version history containing a list of errata changes or other information that should properly be contained in the "Background" section of the standard. In this situation, Reclamation recommends the irrelevant parts of the existing Rationale be deleted or the pertinent parts moved to the Background section of the standard.

Reclamation recommends standards should not be revised simply for the sake of revising the format. Standards should be revised only when the content needs to be updated. Any changes to format should be incorporated at the time of content revisions. If GTB and Rationale must be removed from their standards, Reclamation recommends NERC publish GTB and Rationale in a "book" type aggregation to facilitate ease of locating the information.

Likes 0

Dislikes 0

Response

Michael Whitney - Northern California Power Agency - 3

Answer	No
Document Name	
Comment	
See Response to Question 1	
Likes 0	
Dislikes 0	
Response	
Marty Hostler - Northern California Power Agency - 5	
Answer	No
Document Name	
Comment	
<p>The entire Technical Rationale for Reliability Standards Project is an inefficient and unnecessary administrative task that undermines the value of the Industry vetted and FERC approved Reliability Standards.</p> <p>This project adds zero value to the reliability of the BES, at what expense? This project creates more confusion, not less; more paperwork, not less; several more Balloting and Commenting events, not less; consumes more staff time, money and resources for NERC, Regional Entities, and Registered Entities, not less.</p> <p>The end product, after the estimated five or more years this project will take, will be yet more NERC documents for each Reliability Standard and zero Reliability improvement to the BES.</p> <p>NCPA also support comments by Salt-River Project, Tacoma Power, and Tri-State related to this second posting of the subject project.</p>	
Likes 0	
Dislikes 0	
Response	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	No
Document Name	
Comment	
<p>NV Energy supports and agrees with EEI's comments on the removal of the Technical Rationale from BAL-005-1, and disagreement with the manner and method this is being done. For these reasons, we ask NERC to add the following information to provide needed context in the new Technical Rationale document to ensure proper linkage between the Standard and this new document:</p>	

- Project Number under which the Technical Rationale was developed
- Date the Technical Rational was originally developed
- Hyperlink to the Project Page
- Date the Reliability Standard was approved
- Hyperlink to the Standard

Likes 0

Dislikes 0

Response

Jeanne Kurzynowski - Consumers Energy Company - 1,3,4,5 - RF

Answer No

Document Name

Comment

We prefer to have the rational retained with the standard. We refer to it for help to explain the meaning and intent of the current standard. Keeping the related information with the standard saves additional searching for the information.

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike

Answer No

Document Name

Comment

The GTB sections within the Standards provide background information and context for the Requirements and Measures, often helping interpret what is found in the Standards. Removal of this section results in less structure with interpretation of the Standards. Tacoma Power would prefer that the GTB section remain in the Standard, but if the GTB section is to be ultimately transitioned to a separate Technical Rationale document, it is requested that hyperlink references be provided within the Standard and the applicable Technical Rationale documents in order to maintain continuity.

Likes 0

Dislikes 0

Response

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Salt River Project (SRP) sees this as an administrative task that does not add to the reliability of the Bulk Electric System. Separating out the Guidelines and technical rational into separate documents would require the tracking of these documents for updates. SRP also has process documentation that references the GTB sections of the standard that would need to be updated to reference the new documents. SRP also likes the GTB within the standards so they may be reviewed when there is a revision to the standard.

Likes 0

Dislikes 0

Response

Kjersti Drott - Tri-State G and T Association, Inc. - 1

Answer No

Document Name

Comment

Tri-State prefers the Guidance and Technical Basis (GTB) continue to be included in the same process as standards development. Specifically, we would like to see the GTB continue to be developed at the same time as the standard, and posted for comment at the same time as the standard. Without these documents combined, what assurance does industry have that they will be developed in tandem and posted for industry comment in tandem? The primary reason is to allow entities to comment on the GTB during the drafting of the standard. For example, the Virtualization project has extensive Technical Rationale which Tri-State has used as a basis for understanding the changes and for making comments on the standards under development.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer Yes

Document Name

Comment

California ISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee.

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Yes

Document Name

Comment

As stated by EEI:

EEI supports the removal of the Technical Rationale (TR) from PRC-006-3, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:

- • Project Number under which the Technical Rationale was originally developed
- • Date the Technical Rationale was originally developed

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee

Answer

Yes

Document Name

Comment

Please consider revising the standard page numbering since the standard will have fewer pages. Please consider revising the Technical Rationale page numbering (Example: 1 of X number of pages.)

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 1, 6, 5, 3; Derek Brown, Westar Energy, 1, 6, 5, 3; James McBee, Westar Energy, 1, 6, 5, 3; Marcus Moor, Westar Energy, 1, 6, 5, 3; - Douglas Webb, Group Name Westar-KCPL

Answer	Yes
Document Name	
Comment	
Energy (Westar Energy) incorporates by reference and supports the response of Edison Electric Institute and the response of MRO NERC Standards Review Forum (MRO NSRF).	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEl supports the removal of the Technical Rationale (TR) from PRC-006-3, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:	
<ul style="list-style-type: none"> &bull; Project Number under which the Technical Rationale was originally developed &bull; Date the Technical Rationale was originally developed 	
Likes 0	
Dislikes 0	
Response	
David Jendras - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEl comments.	
Likes 0	
Dislikes 0	
Response	

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon concurs with the comments submitted by EEI.

Submitted on behalf of Exelon for Segments 1, 3, 5, and 6.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

See Question #1 Comments.

Likes 0

Dislikes 0

Response

Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE

Answer Yes

Document Name

Comment

Oklahoma Gas & Electric supports Edison Electric Institute's (EEI) response.

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

No Comments.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2020

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Cantwell - Lower Colorado River Authority - 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

Colleen Campbell - AES - Indianapolis Power and Light Co. - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - Michelle Amarantos

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Neil Shockey - Edison International - Southern California Edison Company - 5

Answer

Document Name

Comment

Please see comments submitted by Edison Electric Institute.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

9. PRC-006-SERC-02: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Kjersti Drott - Tri-State G and T Association, Inc. - 1

Answer No

Document Name

Comment

Tri-State prefers the Guidance and Technical Basis (GTB) continue to be included in the same process as standards development. Specifically, we would like to see the GTB continue to be developed at the same time as the standard, and posted for comment at the same time as the standard. Without these documents combined, what assurance does industry have that they will be developed in tandem and posted for industry comment in tandem? The primary reason is to allow entities to comment on the GTB during the drafting of the standard. For example, the Virtualization project has extensive Technical Rationale which Tri-State has used as a basis for understanding the changes and for making comments on the standards under development.

Likes 0

Dislikes 0

Response

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Salt River Project (SRP) sees this as an administrative task that does not add to the reliability of the Bulk Electric System. Separating out the Guidelines and technical rationale into separate documents would require the tracking of these documents for updates. SRP also has process documentation that references the GTB sections of the standard that would need to be updated to reference the new documents. SRP also likes the GTB within the standards so they may be reviewed when there is a revision to the standard.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer No

Document Name

Comment

Exelon concurs with the comments submitted by EEI.

Submitted on behalf of Exelon for Segments 1, 3, 5, and 6.

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer No

Document Name

Comment

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer No

Document Name

Comment

EEI disagrees with removing the following statement currently contained in the Guideline and Technical Basis of the SERC Regional Reliability Standard:

Basis for SERC standard requirements

SERC Standard PRC-006-SERC-02 is not a stand-alone standard, but was written to be followed in conjunction with NERC Standard PRC-006-1. The primary focus of SERC Standard PRC-006-SERC-02 was to provide region-specific requirements for the implementation of the higher tier NERC standard requirements with the goals of a) adding clarity and b) providing for consistency and a coordinated UFLS scheme for the SERC Region as a whole. Generally speaking, requirements already in the NERC standard were not repeated in the SERC standard. Therefore, both the NERC and SERC standards must be followed to ensure full compliance.

EEI is of the opinion that this statement should be retained within PRC-006-SERC-02 given that this standard is not a “stand-alone” Reliability Standard.

Should this inadvertent, but important statement be included within the Technical Rationale (TR), EEI will also support the removal of the Technical Rationale (TR) from PRC-006-SERC-02, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer

association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:

- Project Number under which the Technical Rationale was originally developed
- Date the Technical Rationale was originally developed

Likes 0

Dislikes 0

Response

Jeanne Kurzynowski - Consumers Energy Company - 1,3,4,5 - RF

Answer No

Document Name

Comment

We prefer to have the rationale retained with the standard. We refer to it for help to explain the meaning and intent of the current standard. Keeping the related information with the standard saves additional searching for the information.

Likes 0

Dislikes 0

Response

Kevin Salsbury - Berkshire Hathaway - NV Energy - 5

Answer No

Document Name

Comment

NV Energy supports and agrees with EEI's comments on the removal of the Technical Rationale from BAL-005-1, and disagreement with the manner and method this is being done. For these reasons, we ask NERC to add the following information to provide needed context in the new Technical Rationale document to ensure proper linkage between the Standard and this new document:

- Project Number under which the Technical Rationale was developed
- Date the Technical Rationale was originally developed
- Hyperlink to the Project Page
- Date the Reliability Standard was approved

• [Hyperlink to the Standard](#)

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5

Answer

No

Document Name

Comment

The entire **Technical Rationale for Reliability Standards Project** is an inefficient and unnecessary administrative task that undermines the value of the Industry vetted and FERC approved Reliability Standards.

This project adds zero value to the reliability of the BES, at what expense? This project creates more confusion, not less; more paperwork, not less; several more Balloting and Commenting events, not less; consumes more staff time, money and resources for NERC, Regional Entities, and Registered Entities, not less.

The end product, after the estimated five or more years this project will take, will be yet more NERC documents for each Reliability Standard and zero Reliability improvement to the BES.

NCPA also support comments by Salt-River Project, Tacoma Power, and Tri-State related to this second posting of the subject project.

Likes 0

Dislikes 0

Response

Michael Whitney - Northern California Power Agency - 3

Answer

No

Document Name

Comment

See Response to Question 1

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer	No
Document Name	
Comment	
<p>As stated by EEI:</p> <p>EEI disagrees with removing the following statement currently contained in the Guideline and Technical Basis of the SERC Regional Reliability Standard:</p> <p><i>Basis for SERC standard requirements</i></p> <p><i>SERC Standard PRC-006-SERC-02 is not a stand-alone standard, but was written to be followed in conjunction with NERC Standard PRC-006-1. The primary focus of SERC Standard PRC-006-SERC-02 was to provide region-specific requirements for the implementation of the higher tier NERC standard requirements with the goals of a) adding clarity and b) providing for consistency and a coordinated UFLS scheme for the SERC Region as a whole. Generally speaking, requirements already in the NERC standard were not repeated in the SERC standard. Therefore, both the NERC and SERC standards must be followed to ensure full compliance.</i></p> <p>EEI is of the opinion that this statement should be retained within PRC-006-SERC-02 given that this standard is not a “stand-alone” Reliability Standard.</p> <p>Should this inadvertent, but important statement be included within the Technical Rationale (TR), EEI will also support the removal of the Technical Rationale (TR) from PRC-006-SERC-02, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:</p> <ul style="list-style-type: none"> &bull; Project Number under which the Technical Rationale was originally developed &bull; Date the Technical Rationale was originally developed 	
Likes	0
Dislikes	0
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	No
Document Name	
Comment	
<p>In general, Reclamation recommends GTB and Rationale should be kept in their current format within each standard. Reclamation recommends that the content of GTB and Rationale can be revised to provide experience gained (similar to lessons learned) from implementing and using the standards. Technical basis can be beneficial for implementing and understanding the requirements of the standards. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.</p> <p>Reclamation asserts that PRC-006-SERC-02 GTB and Rationale provide useful information. In this situation, Reclamation recommends the GTB and Rationale sections be retained.</p>	

Reclamation recommends standards should not be revised simply for the sake of revising the format. Standards should be revised only when the content needs to be updated. Any changes to format should be incorporated at the time of content revisions. If GTB and Rationale must be removed from their standards, Reclamation recommends NERC publish GTB and Rationale in a “book” type aggregation to facilitate ease of locating the information.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer

No

Document Name

Comment

Please see Response to Question 1

Likes 0

Dislikes 0

Response

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Yes

Document Name

Comment

These comments represent the MRO NSRF membership as a whole but would not preclude members from submitting individual comments”. Though, this is not applicable to MRO members, we agree with removing the GTB in order to be consistent with the continent wide Standards format.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

See Question #1 Comments.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2020

Answer

Yes

Document Name

Comment

This is an example where the Basis section (first 2 pages) could be moved to an Implementation Guidance document rather than remain in the Technical Rationale document.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer

Yes

Document Name

Comment

California ISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee.

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - Michelle Amarantos

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colleen Campbell - AES - Indianapolis Power and Light Co. - 3

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
N/A	

Likes 0

Dislikes 0

Response

Neil Shockey - Edison International - Southern California Edison Company - 5

Answer

Document Name

Comment

Please see comments submitted by Edison Electric Institute.

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 1, 6, 5, 3; Derek Brown, Westar Energy, 1, 6, 5, 3; James McBee, Westar Energy, 1, 6, 5, 3; Marcus Moor, Westar Energy, 1, 6, 5, 3; - Douglas Webb, Group Name Westar-KCPL

Answer

Document Name

Comment

No Position. Not in ballot pool.

Likes 0

Dislikes 0

Response

Teresa Cantwell - Lower Colorado River Authority - 5

Answer

Document Name

Comment

N/A - No opinion.

Likes 0

Dislikes 0

Response	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
Not applicable to Minnesota Power.	
Likes 0	
Dislikes 0	
Response	

10. VAR-501-WECC-3.1: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

Please see Response to Question 1

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer No

Document Name

Comment

In general, Reclamation recommends GTB and Rationale should be kept in their current format within each standard. Reclamation recommends that the content of GTB and Rationale can be revised to provide gained experience (similar to lessons learned) from implementing and using the standards. Technical basis can be beneficial for implementing and understanding the requirements of the standards. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.

Reclamation asserts that VAR-501-WECC-3.1 GTB provides useful information. In this situation, Reclamation recommends the GTB section be retained.

Reclamation recommends standards should not be revised simply for the sake of revising the format. Standards should be revised only when the content needs to be updated. Any changes to format should be incorporated at the time of content revisions. If GTB and Rationale must be removed from their standards, Reclamation recommends NERC publish GTB and Rationale in a "book" type aggregation to facilitate ease of locating the information.

Likes 0

Dislikes 0

Response

Michael Whitney - Northern California Power Agency - 3

Answer No

Document Name	
Comment	
See Response to Question 1	
Likes 0	
Dislikes 0	
Response	
Marty Hostler - Northern California Power Agency - 5	
Answer	No
Document Name	
Comment	
<p>The entire Technical Rationale for Reliability Standards Project is an inefficient and unnecessary administrative task that undermines the value of the Industry vetted and FERC approved Reliability Standards.</p> <p>This project adds zero value to the reliability of the BES, at what expense? This project creates more confusion, not less; more paperwork, not less; several more Balloting and Commenting events, not less; consumes more staff time, money and resources for NERC, Regional Entities, and Registered Entities, not less.</p> <p>The end product, after the estimated five or more years this project will take, will be yet more NERC documents for each Reliability Standard and zero Reliability improvement to the BES.</p> <p>NCPA also support comments by Salt-River Project, Tacoma Power, and Tri-State related to this second posting of the subject project.</p>	
Likes 0	
Dislikes 0	
Response	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	No
Document Name	
Comment	
<p>NV Energy supports and agrees with EEI's comments on the removal of the Technical Rationale from BAL-005-1, and disagreement with the manner and method this is being done. For these reasons, we ask NERC to add the following information to provide needed context in the new Technical Rationale document to ensure proper linkage between the Standard and this new document:</p> <ul style="list-style-type: none"> Project Number under which the Technical Rationale was developed 	

- • Date the Technical Rational was originally developed
- • Hyperlink to the Project Page
- • Date the Reliability Standard was approved
- • Hyperlink to the Standard

Likes 0

Dislikes 0

Response

Jeanne Kurzynowski - Consumers Energy Company - 1,3,4,5 - RF

Answer No

Document Name

Comment

We prefer to have the rational retained with the standard. We refer to it for help to explain the meaning and intent of the current standard. Keeping the related information with the standard saves additional searching for the information.

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike

Answer No

Document Name

Comment

The GTB sections within the Standards provide background information and context for the Requirements and Measures, often helping interpret what is found in the Standards. Removal of this section results in less structure with interpretation of the Standards. Tacoma Power would prefer that the GTB section remain in the Standard, but if the GTB section is to be ultimately transitioned to a separate Technical Rationale document, it is requested that hyperlink references be provided within the Standard and the applicable Technical Rationale documents in order to maintain continuity.

Likes 0

Dislikes 0

Response

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC**Answer** No**Document Name****Comment**

Salt River Project (SRP) sees this as an administrative task that does not add to the reliability of the Bulk Electric System. Separating out the Guidelines and technical rational into separate documents would require the tracking of these documents for updates. SRP also has process documentation that references the GTB sections of the standard that would need to be updated to reference the new documents. SRP also likes the GTB within the standards so they may be reviewed when there is a revision to the standard.

Likes 0

Dislikes 0

Response**Kjersti Drott - Tri-State G and T Association, Inc. - 1****Answer** No**Document Name****Comment**

Tri-State prefers the Guidance and Technical Basis (GTB) continue to be included in the same process as standards development. Specifically, we would like to see the GTB continue to be developed at the same time as the standard, and posted for comment at the same time as the standard. Without these documents combined, what assurance does industry have that they will be developed in tandem and posted for industry comment in tandem? The primary reason is to allow entities to comment on the GTB during the drafting of the standard. For example, the Virtualization project has extensive Technical Rationale which Tri-State has used as a basis for understanding the changes and for making comments on the standards under development.

Likes 0

Dislikes 0

Response**Jamie Johnson - California ISO - 2****Answer** Yes**Document Name****Comment**

California ISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee.

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

As stated by EEI:

EEI supports the removal of the Technical Rationale (TR) from VAR-501-WECC-3.1, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:

• Project Number under which the Technical Rationale was originally developed

• Date the Technical Rational was originally developed

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EEI supports the removal of the Technical Rationale (TR) from VAR-501-WECC-3.1, however we suggest certain additional information be included in the TR to demonstrate a stronger and clearer association between the Reliability Standard and the TR document. Registered entities would benefit from the inclusion of the following information, which will provide historical context and allow easier access to the relevant related documents:

• Project Number under which the Technical Rationale was originally developed

• Date the Technical Rational was originally developed

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer	Yes
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Document Name	
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Comment

Ameren agrees with and supports EEI comments.

Likes 0	
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Dislikes 0	
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Response

Daniel Gacek - Exelon - 1

Answer	Yes
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Document Name	
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Comment

Exelon concurs with the comments submitted by EEI.

Submitted on behalf of Exelon for Segments 1, 3, 5, and 6.

Likes 0	
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Dislikes 0	
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Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer	Yes
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Document Name	
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Comment

See Question #1 Comments.

Likes 0	
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Dislikes 0	
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Response

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer	Yes
Document Name	
Comment	
<p>These comments represent the MRO NSRF membership as a whole but would not preclude members from submitting individual comments”. Though, this is not applicable to MRO members, we agree with removing the GTB in order to be consistent with the continent wides Standards format.</p> <p>The NSRF would also like to make two additional general comments. 1. We recommend that NERC add this to the Standard’s “one-stop shopping” spreadsheet. And 2, this process should also be applied to “Background” information such as in the CIP Standards.</p>	
Likes 0	
Dislikes 0	
Response	
Glenn Barry - Los Angeles Department of Water and Power - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2020	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Colleen Campbell - AES - Indianapolis Power and Light Co. - 3	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michelle Amaranos - Michelle Amaranos	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

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

Answer

Document Name

Comment

Not applicable to Minnesota Power.

Likes 0

Dislikes 0

Response

Teresa Cantwell - Lower Colorado River Authority - 5

Answer

Document Name

Comment

N/A - No opinion.

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 1, 6, 5, 3; Derek Brown, Westar Energy, 1, 6, 5, 3; James McBee, Westar Energy, 1, 6, 5, 3; Marcus Moor, Westar Energy, 1, 6, 5, 3; - Douglas Webb, Group Name Westar-KCPL

Answer

Document Name

Comment

No Position. Not in ballot pool.

Likes 0

Dislikes 0

Response

Neil Shockey - Edison International - Southern California Edison Company - 5

Answer

Document Name

Comment

Please see comments submitted by Edison Electric Institute.

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response