

Draft 2 of Version 0 Consideration of Comments – Operating Standards

Std	Comment	Response	Organization	Contact
0	Does the term System Operator refer to Reliability Authority or does it apply to everyone, i.e., TOP, GO, BA, RA? What was NERC's original intent? There are new requirements on the Generator Operators which were not interpreted to apply to them before Version 0.	System Operator was replaced with operator or operating personnel. Applicability is established by each requirement.	Southern Co.	Roman Carter
1	Epsilon 1^2 changed from "...frequency bound.." to "...frequency bandwidth" but not changed anywhere else. CPS2 Data V should be for "absolute value of ACE clock-ten-minutes is greater ..."	Corrected.	BC Transmission	Martin Huang
1	In R1 the term "targeted frequency bound" was changed to "targeted frequency bandwidth". If bandwidth is the new term then bound should be changed in R2, M1, CPS1 Data and CPS2 Data.	Corrected.	FMPA	Robert C. Williams
1	In R1, R2, M1 and CPS2 Data, the symbol epsilon in the text is slightly different than the symbol epsilon in the equations. Should be same symbol for epsilon in all of Draft 2.	Symbol is the same, typeface is different. Will be corrected in final formatting	FMPA	Robert C. Williams
1	Last sentence of M2 should be a Requirement (R5) instead of a Measurement. "A Balancing Authority providing or receiving Supplemental Regulation Service through Dynamic Transfer shall continue to be evaluated on the characteristics of its own ACE with the supplemental Regulation Service included."	This is a measure for R4.	FMPA	Robert C. Williams
1	Regional Differences The actual ERCOT Control Performance Standard 2 Waiver approved November 21, 2002 by the OC should be shown under "Regional Differences".	Provided by link.	FMPA	Robert C. Williams
1	Standard 001. In R1 the term bound was changed to bandwidth. In this R2, it still uses the term bound. This needs to be consistent. This is also true in M1 when referring to the Target Frequency Bound. Should that be bandwidth as well? In M2, the two equations for violation clock-ten-minutes may need to be rearranged in the final document for readability.	Fixed to bound. Equations layout corrected.	FRCC	Linda Campbell

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1	Standard 001. The last paragraph of M2 that reads (A Balancing Authority providing or receiving Supplemental Regulation Service.....) seems like it should be a requirement. Should this have been R5 and just got lost in the editing? This may need to be reviewed.	Removed last paragraph of M2. It is covered by R3 and R4.	FRCC	Linda Campbell
1	Standard 001. The Regional Difference refers to the ERCOT Control Performance Standard 2 Waiver. We believe the details of this waiver need to be spelled out in this standard and not referenced back to something that could be lost. The specifics need to be a part of the standard.	Link was included in Draft 2 but may not have worked in Acrobat. Link will be in Draft 3.	FRCC	Linda Campbell
1	This is really standard 001. The protected comment form automatically changes the format of the number field. The symbols in the paragraph for epsilon are non consistent. It is not a big deal, but the standard should use the same symbol throughout.	Symbol is the same, typeface is different. Will be corrected in final formating	FRCC	Linda Campbell
1	"L10 is defined in Standard 002." This is not defined as stated, it is defined in R2 (page 001-2)	Corrected reference.	Grant PUD	Bill Dearing
1	Typo. Replace "bound" with "band."	Changed all band or bandwidths to bound for consistency.	Grant PUD	Bill Dearing
1	To maintain Interconnection steady-state frequency within defined limits by balancing real power demand and supply (generation plus INTERCHANGE) in real-time. CPS1 and CPS2 are steady-state measurements as opposed to disturbance measurements.	Added steady-state. Do not agree the second edit clarifies the purpose.	Manitoba Hydro	Gerald Rheault
1	In the Process section the reset period fpr CPS2 states you will have 0 violations in a calender month. The requirement is to have 90% of the clock 10-minute periods without a violation. It is not likely that anyone will reset with this criteria. The reset criteria should be meeting the CPS2 requirement for one calendar month.	Removed "without a violation".	MAPP OS	Robert Coish
1	No measures associated with Requirement 3.	None in policy.	MAPP OS	Robert Coish
1	No Measures associated with Requirement 4.	None in policy.	MAPP OS	Robert Coish

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1	In several places subscripts were not used, making language tough to follow. For example, in the paragraph which references PSRD 1.2.1 reads: "...same factors that limit total periods per month will limit violations per month." It should read: "...same factors that limit Total Periodsmo ⁿ th will limit Violationsmo ⁿ th", with "month" as a subscript to be consistent with the equation to which the text refers.	Shown correctly in equations. Did not find any references in the text.	Mirant	Alan Johnson
1	In the Process section on page 5, the last two paragraphs were deleted. They appear to be existing reporting requirements (shall statements). They should be captured as a requirement (R5?).	Survey obligation is addressed in first paragraph of process. Redundancy removed.	Mirant	Alan Johnson
1	In the second paragraph, the word "bound" is replaced with "bandwidth". For consistency and clarity, suggest retaining "bound".	Changed all band or bandwidths to bound for consistency.	Mirant	Alan Johnson
1	Under the Levels of Non Compliance section, Balancing Area should be replaced with Balancing Authority Area, a defined term under the NERC Functional Model.	Corrected.	Mirant	Alan Johnson
1	In the Process section the reset period for CPS2 states you will have 0 violations in a calendar month. The requirement is to have 90% of the clock 10-minute periods without a violation. It is not likely that anyone will reset with this criteria. The reset criteria should be meeting the CPS2 requirement for one calendar month.	Corrected.	Otter Tail	Larry Larson
1	No measures associated with Requirement 3.	None in policy.	Otter Tail	Larry Larson
1	No Measures associated with Requirement 4.	None in policy.	Otter Tail	Larry Larson
1	Attachment 001-1: In the description for the variable V in the CPS2 Data table, Number of incidents per hour should be changed to per month. Same for description of variable U	Version 1 change.	XCEL	Dean Shiro
1	Calculation for CPS1 should not include the character % after the number 100.	Translation of existing policy. Version 1 issue.	XCEL	Dean Shiro

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2	Missing graph with $ACE < 0$. Should delete second reference to ACEM that "is the minimum algebraic value of ACE..." and all subsequent reference to ACEM since the purpose of this standard applies to loss of generation, not load.	Graph added back in. Current policy is phrased as presented in standard.	BC Transmission	Martin Huang
2	Add the words "or Reserve Sharing Groups" to the end of this requirement. This clarifies that the same Contingency Reserves can also not be counted towards meeting the obligations of two separate Reserve Sharing Groups.	Standard already states that RSG must meet all requirements of a BA.	BPL-PBL	Deanna Phillips
2	An important part of this requirement that is missing from what is written here is that the specified recovery MUST occur within the Disturbance Recovery Period; which is presently specified as 15 minutes. Rectify this by adding "within the Disturbance Recovery Period" to the end of the first sentence of this requirement.	Version 1 change.	BPL-PBL	Deanna Phillips
2	COMPLIANCE MONITORING: This section is deficient in that it lacks specific information regarding WHICH DISTUBANCES must be included in the periodic reports referred to in the second paragraph. Moving the information addressing this issue in the first two sentences of the first paragraph of M1 to between the first and second paragraphs of this section will resolve this confusion.	Corrected.	BPL-PBL	Deanna Phillips
2	PURPOSE: - An important part of this standard that is missing from the Purpose section is that the specified recovery MUST occur within the Disturbance Recovery Period. Rectify this by adding the phrase "within the Disturbance Recovery Period" to the first sentence of the Purpose paragraph between the words "limits" and "following".	The purpose is a general statement in lay language. "Within limits" addresses the comment and the details of those limits are in the standard.	BPL-PBL	Deanna Phillips
2	REGIONAL DIFFERENCES: Add as a Regional Difference the fact that WECC Contingency Reserve Restoration Period is 60 minutes; which is shorter than the 90 minute NERC requirement. The WECC requirement is in the WECC Minimum Operating Reliability Criteria Section 1.A.4.	More restrictive is OK and does not require a regional difference. Not in conflict with NERC standard.	BPL-PBL	Deanna Phillips

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2	Though they are technically correct, the first two sentences of the first paragraph are located in the wrong section of this standard. Since they refer to which disturbances must be reported on for compliance purposes, they belong in the Compliance Monitoring Process section of this standard.	Version 1 change.	BPL-PBL	Deanna Phillips
2	In [PSRD 2.3] the second ACE in the first sentence should be eliminated. Also there are three ACE subscript "m" in [PSRD 2.3] that should be changed to subscript "M".	Corrected.	FMPA	Robert C. Williams
2	The term Reportable Disturbance needs to replace some words in the first sentence of M1. Recommended change " A Balancing Authority or Reserve sharing Group shall calculate and report compliance with the Disturbance Control Standard for all Reportable Disturbances.	Version 1 change.	FMPA	Robert C. Williams
2	Standard 002. Measure M1 begins with what the BA shall calculate and report. The first part of this paragraph really should be a requirement. It should reference Reportable Disturbances. We would suggest moving this to the requirements section and beginning M1 with the statement, Disturbance Control Standard is measured as the percentage recovery (Ri) and then have the diagram and explanation.	The calculation is part of the measure supporting the requirements.	FRCC	Linda Campbell
2	Standard 002. The Levels of Non-compliance are not really levels of non-compliance. These are what a BA or RSG must do if they do not meet the DCS, so really appear to be sanctions or penalties associated with non-compliance. This should be reviewed and corrected.	This is a Version 1 issue. These statements are part of current policy.	FRCC	Linda Campbell
2	Standard 002. The portion of M1 that came from [PSRD 2.3] states, Determination of ACEm or ACEm. Should the, or ACEm, be removed? It looks like an error to us.	Corrected.	FRCC	Linda Campbell
2	ACEM is defined twice using a different definition.	Ask Raymond.	Grant PUD	Bill Dearing

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2	Compliance Monitoring Process: Second Paragraph is the same Standard as in page 001-5, paragraph 1, as it references NERC Control Performance Standards Survey. We understand that the reporting event is different, but the wording makes the report appear to be two different reports.	Ask Raymond.	Grant PUD	Bill Dearing
2	Delete last sentence in first paragraph. Insert "100% of the time for Reportable Disturbances" between "met" and "within."	Revised language; check with Raymond.	Grant PUD	Bill Dearing
2	Formula appears to have an error. "0,"	0, means maximum of either 0 or the formula.	Grant PUD	Bill Dearing
2	Levels of Non Compliance: We could not identify where "APR" is defined. Should this be "DCS?"	Need to find correct term and replace. Get definition of measure from Performance Standards Training Document and add to the measures M1 and/or M2.	Grant PUD	Bill Dearing
2	Applicability: delete all references to Reserve Sharing Groups. The Functional Model assigns the responsibility of control on the BAs. BAs that agree to use RSGs may do so but that is HOW they have decided to handle DCS.	Standard is applicable to a group of BAs.	MAAC	Al DiCaprio
2	Delete Requirement. First it is unnecessary (see above). Second it is not a mandate - the use of the word may makes it an option. Third a BA may choose any arrangement (not just RSGs) to meet its obligation and four (and most importantly, NERC cannot mandate that all RSG members have the same obligations and responsibilities. As written this Requirement would adversely impact the some Reserve sharing programs - those that help but do not obligate each member - the member is on the ho in the NE.	BA can elect option of RSG but assigns obligations if they do.	MAAC	Al DiCaprio
2	Second paragraph is missing a close bracket.	Could not find typo. Possibly corrected.	MAPP OS	Robert Coish

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2	<p>Standard 2, R5 changes what constitutes a reportable disturbance. The new language states that A Reserve Sharing Group shall be considered in a Reportable Disturbance condition whenever a group member has experienced a Reportable Disturbance and calls for the activation of Contingency Reserves from one or more other group members. The existing policy states REPORTABLE DISTURBANCES are contingencies that are greater than or equal to 80% of the MOST SEVERE SINGLE CONTINGENCY loss. The current interpretation is that a reportable disturbance is 80% of the reserve sharing groups most severe single contingency loss and not 80% of the largest single contingency loss for each BA. This will mean a lot more reportable disturbances for the MAPP region. This also appears to be in conflict with Measurement 1 which indicates the reportable disturbance is 80% of the reserve sharing group's largest contingency.</p>	<p>The Drafting Team believes R5 is a verbatim translation of Policy 1B2.3 and does not see the difference cited.</p>	MAPP OS	Robert Coish
2	<p>Standard 2, R5 changes what constitutes a reportable disturbance. The new language states that a Reserve Sharing Group shall be considered in a Reportable Disturbance condition whenever a group member has experienced a Reportable Disturbance and calls for the activation of Contingency Reserves from one or more other group members. The existing policy states reportable disturbances are contingencies that are greater than or equal to 80% of the MOST levere single contingency loss. The current interpretation is that a reportable disturbance is 80% of the reserve sharing groups most severe single contingency loss and not 80% of the largest single contingency loss for each BA. This also appears to be in conflict with Measurement 1 which indicates the reportable disturbance is 80% of the reserve sharing group's largest contingency.</p>	<p>The Drafting Team believes R5 is a verbatim translation of Policy 1B2.3 and does not see the difference cited.</p>	Otter Tail	Larry Larson

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2	Second paragraph is missing a close bracket.	Could not find typo. Possibly corrected.	Otter Tail	Larry Larson
2	Define or clarify the term APR.	Corrected.	PEPCO	Dick Kafka
2	Policy 1B, Section 2.5 regarding the "Treatment of Multiple Contingencies" is described in the Policy mark-up as being moved to "Supporting Notes" in the standard. The "Supporting Notes" were not included for review in the standard.	Corrected.	Progress Carolina	Verne Ingersoll
2	Policy 1B, Section 2.5 regarding the "Treatment of Multiple Contingencies" is described in the Policy mark-up as being moved to "Supporting Notes" in the standard. The "Supporting Notes" were not included for review in the standard.	Corrected.	Progress Florida	Eric Grant
2	Glossary leaves the definition of "reportable disturbance" entirely to the Regional Reliability Organizations provided it's at least 80% of the worst contingency. To the contrary, the definition in Policy 1 & in the "Supporting Notes" (a) excluded "normal" operating characteristics, (b) specified only sudden, unanticipated losses of "supply-side" resources, & (c) allowed RROs to "reduce" the 80% threshold. So glossary definition is both more restrictive ("at least 80%") and broader (loss of load)	Corrected.	Robert Blohm	Robert Blohm
2	Restore the "Supporting Notes" contained in Draft 1. They define the "scope" of the standard during multiple contingencies. No mandate and no notification was given for the sudden omission of the "Supporting Notes" from Draft 2. Without the "Supporting Notes" to which Policy 1 Section 2.5 was "mapped" into, the Standard is inoperable in the case of multiple contingencies. Policy 1 exempted recovery from multiple contingencies. Accordingly, the current Draft-2 misrepresents Policy 1.	Corrected.	Robert Blohm	Robert Blohm
2	Restore the Policy 1 Section 2.4 definition of "reportable disturbance" that was contained in the "Supporting Notes" contained in Draft-1 but dropped from Draft-2, and that was replaced in Draft-2 by a glossary definition of	Corrected.	Robert Blohm	Robert Blohm

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	"reportable disturbance" that misrepresents Policy 1. See comment to this definition in next box below and in answer to question 8.			
2	"The Disturbance Recovery Criterion is that e" is a larger font than rest of document.	Corrected.	SRP	Gary Nolan
2	In the Levels of Non-Compliance, the acronym APR was brought over from the Compliance Templates without its definition. Nor is it listed in the NERC Glossary.	Term has been spelled out.	SRP	Gary Nolan
2	In PSRD 2.3, The ACE_m starting the second sentence should read ACE_M	Corrected.	XCEL	Dean Shiro
2	In the section defining the variables to calculate percentage recovery, the second ACE_M should be ACE_m.	Corrected.	XCEL	Dean Shiro
3	Standard is translated correctly. Utility with variable freq. bias may still misrepresent their freq. bias for a significant part of the year due to the requirement for "monthly average Freq. Bias Setting that is at least 1%" of yearly peak demand.	Version 1 change.	BC Transmission	Martin Huang
3	The words "as close as practical to" are not sufficiently definitive enough to enable this requirement to be measurable. Since existing policy does not give any further guidance in this area, we ask that this issue be forwarded to the appropriate Version 1 Drafting Team for resolution.	Version 1 change.	BPL-PBL	Deanna Phillips
3	Understanding this requirement is dependent upon knowing what a Frequency Response Characteristic is and the relationship between it and a Control Area's Frequency Bias. This potential for confusion can be resolved in one of two ways. Either (1) avoid use of specific defined terms by changing the end of the first sentence to "in the characteristics of the frequency response of its BA Area. Or (2) define Frequency Response Characteristic and Frequency Bias in sufficient detail the Glossary.	FRC is not a defined term but is used. Need to add to glossary or eliminate from standard. Check if Frequency Bias is defined term.	BPL-PBL	Deanna Phillips
3	Change to active voice: (suggested) "A Balancing Authority shall not change its Frequency Bias setting when performing	Corrected.	Grant PUD	Bill Dearing

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	Supplemental Regulation Service."			
3	In reference to "NERC Operating Committee" throughout the Ver0 Standards, would it be more correct to use "Compliance Monitor?"	Referred to applicable standing committee. Version 1 issue.	Grant PUD	Bill Dearing
3	The measure is not connected to the requirements. The requirements for Standard 3 all refer to Frequency Bias and Frequency Bias setting. The measure is to complete a Response Survey. A measure of Frequency Bias settings is to have a Bias setting. The fact that the requirement mandates a minimum setting (i.e a system with no response at all must have a FBS), makes the measurement of a system's response to an ad hoc event a meaningless exercise vis-à-vis the FBS.	Version 1 change.	MAAC	Al DiCaprio
4	REGIONAL DIFFERENCE: Neither the WECC MORC nor the WECC Procedure for Time Error Control make provision for this type of termination of a Time Error Correction. Therefore, either (1) change Requirement R4.1 to a Regional Difference for the Eastern Interconnection or (2) add as a Regional Difference that WECC Time Error corrections cannot be terminated at the request of a Balancing Authority. Which alternative is most appropriate probably depends upon whether or not ERCOT allows for it.	Current policy allows BA to request halt to time error correction.	BPL-PBL	Deanna Phillips
4	Change to "Each Balancing Authority, when requested, shall participate in a Time Error Correction by one of the following methods: R3.1 [Policy 1D 3.1] The Balancing Authority shall offset its frequency schedule by 0.02 Hertz, leaving the Frequency Bias Setting normal; or R3.2 [Policy 1D 3.2] The Balancing Authority shall offset its Net Interchange Schedule (MW) by an amount equal....."	Corrected.	FMPA	Robert C. Williams
4	Standard 004, R1 states that a single RC in each Interconnection will be designated at the time monitor. Who will decide this and by when? The	The NERC OC will be responsible.	FRCC	Linda Campbell

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	current policy states it is the NERC ORS and it is decided by Feb 1st. Will this stay the same?			
4	Standard 004, R3. For clarity, we would suggest the sentence be restructured to read as follows, Each Balancing Authority, when requested, shall participate in a Time Error Correction by one of the following methods: In R3.1 and R3.2 the word shall needs to be inserted between Balancing Authority and offsets. Offsets needs to be changed to offset.	Corrected.	FRCC	Linda Campbell
4	Standard 004, R4. This states that any RC shall have the authority to terminate a time error correction in progress. The current policy says they may request the termination. Wouldn't the Time Monitor be the one to decide?	Corrected.	FRCC	Linda Campbell
4	Add Reliability Authorities	RA removed from Version 0	Grant PUD	Bill Dearing
4	The SDT has introduced a new requirement, i.e. that an RC must serve as the Time Monitor. The current standard requires only that a monitor be a Reliability Authority not an RC.	Policy 1D Introduction states RC shall be designated as Time Monitor.	MAAC	Al DiCaprio
5	A fundamentally important point of this requirement is that the Banancing Authorities must agree upon THE SAME ramp rate. Agreeing that they will both use different ramp rates is not to be allowed under this requirement. To close this potential hole in the requirement, please modify this requirement to use the phrase "... use common agreed upon ramp rates ...".	Corrected.	BPL-PBL	Deanna Phillips
5	Placing the requirements in this standard in the order that they appeared in the NERC Policies has resulted in them being in a confusing and seemingly random order. Calrity of this standard would be improved immensely if these many requirements were to be reordered in more of a building block approach; beginning with the most fundamental and working toward the most complex. A suggestion would be to put them in the order of R1, R6 - R8, R13 - R16, R9 -	Translation of existing policy. Version 1 issue.	BPL-PBL	Deanna Phillips

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	R12, R2, R3, R4, R5.			
5	PURPOSE: To properly communicate the purpose of this complex standard to those who are unfamiliar with this subject, it is necessary to first discuss "what we are trying to accomplish" before stating "how we will to accomplish it through use of ACE and Regulating Reserves". This can be achieved by reverseing the order of the two sentences in this paragraph and rewording them such that they flow appropriately.	Minor edit made now, further clarification is a Version 1 issue.	BPL-PBL	Deanna Phillips
5	Replace the words "Dynamic Schedule or Psuedo Tie" with the defined term Dynamic Transfer.	Corrected.	BPL-PBL	Deanna Phillips
5	The first sentence of R 16 essentially repeats R 8 of this same standard. Please reorder the requirements of this standard so that these related requirements are next to eachother in the same area of the standard	Same order as existing policy.	BPL-PBL	Deanna Phillips
5	The phrase "shall sample data" is not specific enough about "what data" as to enable this requirement to be measurable. If possible, please list specifically what data or types of data are meant. If existing policy is not specific enough in this area to be able to do this as a part of Version 0 then, we ask that this issue be forwarded to the appropriate Version 1 Drafting Team for resolution.	Version 1 change.	BPL-PBL	Deanna Phillips
5	The three sentences of this requirement are actually three separate requirements that will require separate measures for compliance. Therefore, we ask that they be split into two separate requirements.	Version 1 change.	BPL-PBL	Deanna Phillips
5	The two sentences of this requirement are actually two separate requirements that will require separate measures for compliance. Therefore, we ask that they be split into two separate requirements.	Version 1 change.	BPL-PBL	Deanna Phillips

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5	The two sentences of this requirement are actually two separate requirements that will require separate measures for compliance. Therefore, we ask that they be split into two separate requirements.	Version 1 change.	BPL-PBL	Deanna Phillips
5	The words "prevent such service from becoming a burden upon ..." are not sufficiently definitive enough to enable this requirement to be measurable. Since existing policy does not give any further guidance in this area, we ask that this issue be forwarded to the appropriate Version 1 Drafting Team for resolution.	Version 1 change.	BPL-PBL	Deanna Phillips
5	Standard 005, R11. This may be a nit, but we are not clear. This requirement states that the BA shall use agreed upon ramp rates in the Scheduled Interchange values to calculate ACE. THE current policy states it should include the effect of ramp rates. Not sure these are the same thing. May want to double check this.	Corrected.	FRCC	Linda Campbell
5	Add Reliability Authority or replace Reliability Coordinator with Reliability Authority	RA removed from Version 0	Grant PUD	Bill Dearing
5	This requirement is a significant deviation from the existing standard, which is applicable to the Balancing Authority. How does the GOP, TOP or LSE ensure that the BA has included its generation, transmission or load in the BA's calculations? With the text contained in R1, R1.1 R1.2 and R1.3 are not necessary.	Subelements define who is accountable for the action.	Mirant	Alan Johnson
5	Original Policy stated that all generation, load, and transmission operating in an interconnection must be within a BA. The V-0 Std. states that the Gen. Operator is now responsible for making sure they are inside a BA. The RC or BA should be held responsible for making sure all generation is covered under a BA.	The drafting team believes that the operators of facilities connected to the interconnection are responsible for making sure they have elected a BA.	Southern Co.	Roman Carter
5	In Purpose, the acronym ACE is used prior to being defined. Then, subsequently throughout the Standard, it is used and defined, used and not defined, etc. Be consistent by only defining it on its first appearance in this	Corrected.	SRP	Gary Nolan

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	standard or do not define it since it is included in the Glossary.			
5	Requirement 8.1 & 8.2 are misnumbered. Numbering a requirement as a subset to a requirement that does not exist (e.g. R8) is confusing and inaccurate. Additionally, R8.1 and 8.2 do not relate to one another and therefore have no reason to be included in the same subset. The proper numbering should be 8.1 = 8 and 8.2 = 9, with all subsequent requirements renumbered as needed.	Corrected.	SRP	Gary Nolan
6	The section 1G1.1 of the Compliance Monitoring Process talks specifically about a requirement for the BA to do AIEs to submit data to NERC for analysis purposes. Since AIE is not a part of the NERC Compliance Program at this time, this section should be moved to in the Requirements section of this standard.	Version 1 change.	BPL-PBL	Deanna Phillips
6	The two sentences of this requirement are actually two separate requirements that will require separate measures for compliance. Therefore, we ask that they be split into two separate requirements.	Version 1 change.	BPL-PBL	Deanna Phillips
6	Regional Differences The actual MISO RTO Inadvertent Interchange Accounting Waiver approved by the Operating Committee on March 25, 2002 should be shown under "Regional Differences".	Waivers will be linked to the standard.	FMPA	Robert C. Williams
6	Standard 006, Regional Differences. THE MISO RTO Inadvertent Interchange Accounting waiver is referenced here. Need to include the details of the waiver itself as part of the standard, not just a reference to something else.	Waivers will be linked to the standard.	FRCC	Linda Campbell
6	Compliance Monitoring Process: Strike last sentence in third paragraph. It seems to be covered in the 5th paragraph.	Corrected.	Grant PUD	Bill Dearing
6	An inadvertant time-error payback methodology already exists in the WECC and IPC will continue to use it. If Version 0 does not support this methodology, the WECC would likely request a variance.	Standard 6 does not prescribe the payback method - that is addressed in the NAESB payback procedure.	Idaho Power	Kent McCarthy

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6	Remove the wording "with like values but opposite signs" in order to make more clarity in R4.	Exact translation of policy; need to revise in Version 1.	IMO	Peter Henderson
6	Per the draft Glossary, Off Peak is defined as Those hours or other periods defined by NAESB business practices, contract, agreements, or guides as periods of lower electrical demand. Don't believe this is clear enough. The existing definition is more specific and is found in Appendix A of the NAESB Inadvertent Interchange Standard. Believe it will be much clearer to cite the specific NAESB business practice in the requirement, rather than relying on a general definition found in the glos	Check this definition to see if it is an improvement.	Mirant	Alan Johnson
6	Remove the wording "with like values but opposite signs" in order to make more clarity in R4.	Exact translation of policy; need to revise in Version 1.	NPCC CP9	Guy Zito
6	Remove the wording "with like values but opposite signs" in order to make more clarity in R4.	Exact translation of policy; need to revise in Version 1.	NYPA	Chris de Graffenried
6	Remove the wording "with like values but opposite signs" in order to make more clarity in R4.	Exact translation of policy; need to revise in Version 1.	NYPA	Ralph Rufrano
6	SPPC would want to continue to use the WECC inadvertent time payback methodology. SPPC would want to have WECC reserve the right to request a regional difference if the Version zero standard is in opposition to WECC inadvertent payback procedures.	Standard 6 does not prescribe the payback method - that is addressed in the NAESB payback procedure.	Sierra Pacific	Marylin Franz
6	WECC has an inadvertent time-error payback methodology which we would continue to use. WECC would reserve the right to request a regional difference if the Version 0 standard does not support the WECC methodology.	Standard 6 does not prescribe the payback method - that is addressed in the NAESB payback procedure.	WECC IS	Robert Schwermann
7	Continued I would hope that no one would consider opening an Interconnection just because of an imminent danger of violating an IROL or SOL. The bottom line is the Reliability Authority and Transmission Operators need to be able to take actions as they deem necessary to protect their area independent of whether an IROL or SOL is in imminent danger of being violated. Continued	Existing statement is correct.	BPA-TBL	Tracy Edwards

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7	Continued Therefore, change the second sentence of R5 to read as follows: The Reliability Authority or Transmission Operator may take such actions as disconnecting from the Interconnection, as it deems necessary, to protect its Area.	Version 1 change.	BPA-TBL	Tracy Edwards
7	R5 indicates that every effort shall be made to remain connected to the Interconnection. However the second sentence of the requirement implies that it may be acceptable to disconnect from the Interconnection if there is imminent danger of violating an IROL or SOL. There can be other conditions other than violating IROL's or SOL's that place the system at great risk. In fact, violating an IROL or SOL in itself does not necessary mean the system is at imminent risk. Continued	Version 1 change.	BPA-TBL	Tracy Edwards
7	Need to include "Balancing Authority" because of the impact on stability of generation serving load.	BA is responsible only for balancing; TOP is responsible for transmission reliability.	FMPA	Robert C. Williams
7	The "Reliability Authorities" and "Reliability Authority" should be changed to "Reliability Coordinators" and "Reliability Coordinator" in "Applicability" and R1-6	RA removed from Version 0	FMPA	Robert C. Williams
7	Standard 007, R1--R6. Need to remove the RA and only leave Transmission Operator. Also for R2, need to put BA's in with the TOPs in operating to protect against instability, etc etc. Then would also need to include BA's in the applicability section.	Removed RA; do not agree to adding BA since BA is responsible only for balancing, not transmission security.	FRCC	Linda Campbell
7	(Also in R5) This needs to be clarified whether these requirements have to be fulfilled by both presently worded RA (i.e. new proposed terminology RC) and TO - "individually or jointly". It is not clear that who would be overall monitor. A more clearer role needs to be identified in this standard. Also Reliability entity should be termed as 'RC'. Please see comments in Q1.	Simplified by removal of RA.	IMO	Peter Henderson
7	Although I agree with the requirement, it is a stretch from what Policy 5A	Drafting team believes this	Mirant	Alan Johnson

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Std	Comment	Response	Organization	Contact
	requirement 1 currently says.	translation is what was intended.		
7	Believe that this translation of Policy 5A, requirement 7 is too restrictive. In this case, believe that the translation of OA should extend to the GOP. Also, it doesn't make sense to include the RA within the requirement because the RA is not an operator of equipment (e.g. generators, transmission facilities) connected to the transmission system.	Need to review the intended scope of OA in this instance.	Mirant	Alan Johnson
7	For clarity, suggest modifying the requirement to read as follows: Each Reliability Coordinator and Transmission Operator shall operate the transmission system ...	This standard is focused on TOP requirements. RC requirements are in standards 033-040.	Mirant	Alan Johnson
7	With the decision to use RC in lieu of RA in standards 33-40, believe that the RA should not be used at all in Version 0. It is confusing to have both the RA and RC within the same standard set. As such recommend replacing references to RA with RC in this standard	Agreed.	Mirant	Alan Johnson
7	(Also in R5) This needs to be clarified whether these requirements have to be fulfilled by both presently worded RA (i.e. new proposed terminology RC) and TO - "individually or jointly". It is not clear that who would be overall monitor. A more clear role needs to be identified in this standard. Also Reliability entity should be termed as 'RC'. Please see comments in Q1.	Translation of existing policy. Version 1 issue.	NPCC CP17	Guy Zito
7	(Also in R5) This needs to be clarified whether these requirements have to be fulfilled by both presently worded RA (i.e. new proposed terminology RC) and TO - "individually or jointly". It is not clear that who would be overall monitor. A more clear role needs to be identified in this standard. Also Reliability entity should be termed as 'RC'. Please see comments in Q1.	Translation of existing policy. Version 1 issue.	NYPA	Chris de Graffenried
7	(Also in R5) This needs to be clarified whether these requirements have to be fulfilled by both presently worded RA (i.e. new proposed terminology RC) and TO - "individually or jointly". It is not clear that who would be overall monitor.	Removal of RA simplifies this requirement.	NYPA	Ralph Rufrano

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Std	Comment	Response	Organization	Contact
	A more clear role needs to be identified in this standard. Also Reliability entity should be termed as 'RC'. Please see comments in Q1.			
7	The Reliability Coordinator needs to be included in the chain so the Area Wide assessments can be made along with the BA Wide assessments. Could not find any reference to this subject in Standards 33 through 40.	Addressed in standard 35.	SMUD	Nick Hennerly
7	It is not practical to say the RA and the TOP operate, when practical, to protect against instability, separation, or cascading outages. Recommend removing "when practical" because when is it ever practical to allow cascading outages.	Version 1 issue - the 'practical' reference is to multiple contingencies. Cannot operate to all multiple contingencies.	Southern Co.	Roman Carter
8	R1 and M1 both requires the Reliability Coordinate be informed of any IROL or SOL violation but the level of non-compliance only applies when the limit is exceeded more than 30 minutes and none for failure to report the violation.	Version 1 issue.	BC Transmission	Martin Huang
8	The RA should not be spending there time informing the RC, they should be too busy actually trying to get under the limit. The RC should know by their monitoring that an IROL or a SOL has been exceeded. I would agree with the RA informing the RC what actions have been or will be taken if they have exceeded the limit for over 30 minutes.	RA removed from Version 0	BPA-TBL	Tracy Edwards
8	Compliance Monitoring Process: (bullets following the first paragraph) 2) ... Is vague and not measureable 3) ... Would not nesslerly make it an IROL. 4) ... Would not nesslerly make it an IROL. 5) ... Is vague and there is no unacceptable loss of load definition for NERC that is measurable	Version 1 issue. These came from the existing compliance templates.	BPA-TBL	Tracy Edwards
8	Compliance Monitoring Process: (first paragraph, second sentence) If this sentence were true the violation would have been an IROL to begin with. Give an example of this scenerio.	Version 1 issue. These came from the existing compliance templates.	BPA-TBL	Tracy Edwards

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Std	Comment	Response	Organization	Contact
8	Give an example of how you would show evidence something was evaluated. This does not seem like a possible measure. Also the RC may not have needed to give any additional direction and would therefore not have any evidence as required by the measure.	Version 1 issue. These came from the existing compliance templates.	BPA-TBL	Tracy Edwards
8	Purpose: The last sentence of the purpose statement should read _Violations lasting longer than 30 minutes are also reported to the compliance program.	Removed the sentence.	BPA-TBL	Tracy Edwards
8	Remove "Reliability Athority" from Standard 008.	Removed.	FMPA	Robert C. Williams
8	Standard 008, Levels of Non-compliance. Need to remove the RA from each of these.	Removed.	FRCC	Linda Campbell
8	Standard 008, M1-M3. What kind of evidence is anticipated? The word evidence can be very subjective and broad. Also the RA should be removed from these measures.	Translation of existing compliance template, will require refinement in Version 1.	FRCC	Linda Campbell
8	Standard 008, R3 & R4. Need to add BA along with the TOP to take appropriate action. In R1-R4 need to remove the RA and leave the TOP with the transmission responsibilities.	BA is responsible only for balancing; TOP is responsible for transmission reliability.	FRCC	Linda Campbell
8	Standard 008. In the Compliance Monitoring Section, the 2nd paragraph states that the RC shall report to the RRO and NERC within 72 hours. Where did this come from? We did not see this is current policy or in the compliance templates P2T1 or P2T2. Also the RC reporting any SOL that has become an IROL because of changed system conditions is very different that what is in the compliance assessment notes of P2T1. Need to double check that the intent has not been changed.	Requiment is derived from Policy 2A 2.1.	FRCC	Linda Campbell
8	Standard 008. THE last sentence of the purpose is unnecessary and should be removed. Also, compliance template P2T2 should be a source reference. Need to add BA back into the applicability section as R3 should also apply to BA's.	BA is responsible only for balancing; TOP is responsible for transmission reliability.	FRCC	Linda Campbell

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Std	Comment	Response	Organization	Contact
8	If IPC must inform RC anytime IROL or SOL has been exceeded, it would impose a great and unnecessary burden on it. Recommend elapsed time requirement be included.	This is an existing requirement.	Idaho Power	Kent McCarthy
8	(Measures M1, M2 & M3) These measures in its present format outlines a complex co-ordination/reporting mechanism requiring that both RA & TO informs/reports IROL/SOL violations to RC, RC then evaluates actions of RA & TO and provides directions to RA/TO to return system within limits. RA/TO to then take corrective actions as directed by RC. The fact is that following a contingency resulting in IROL violation the system has to be returned ASAP and/or within 30 minutes.	RA removed from Version 0.	IMO	Peter Henderson
8	Under "Applicability" and "Requirements", an example of confusions being created due to use of both RA and RC can be seen. This related to our comments outlined in Q1 of NERC Comment Form. We are of the opinion that there should not be both an RA and an RC. The evidences from these standards demonstrate that a use of both RA and RC terminology's creates more complexity and confusion in performing various operational tasks outlined in these standards.	RA removed from Version 0.	IMO	Peter Henderson
8	Under "Purpose", the last sentence should be read as follows: Violations are also reported to the compliance monitor.	Corrected.	IMO	Peter Henderson
8	This requirement or requirement 2 of Standard 15 would seem unnecessary. Standard 15 seems to provide the RC with all of the data necessary to do monitoring and analysis, yet this standard requires RA to inform the RC of overloads. Is this necessary?	Removed the RA. TOP must inform the RC, as is policy today, so that RC can see if additional actions are needed.	MAAC	Al DiCaprio
8	With the decision to use RC in lieu of RA in standards 33-40, believe that the RA should not be used at all in Version 0. It is confusing to have both the RA and RC within the same standard set. As such recommend replacing references to RA with RC in this standard	RA removed from Version 0.	Mirant	Alan Johnson

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Std	Comment	Response	Organization	Contact
8	(In Purpose)The last sentence should be read as follows: Violations are also reported to the compliance monitor.	Removed sentence.	NPCC CP25	Guy Zito
8	(Measure 1,2 and 3)a complex co-ordination/reporting mechanism requiring that both RA & TO informs/reports IROL/SOL violations to RC, RC then evaluates actions of RA & TO and provides directions to RA/TO to return system within limits. RA/TO to then take corrective actions as directed by RC. The fact is that following a contingency resulting in IROL violation the system has to be returned ASAP and/or within 30 minutes. -continued- The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in returning the system - ASAP, and in turn would create confusions thereby impacting reliability. There should only be one Reliability designation/entity i.e. RC. See our comments and position outlined in Q1 of NERC comment form re: use of one terminology RC only.	Removed RA from Version 0.	NPCC CP33	Guy Zito
8	(In Purpose)The last sentence should be read as follows: Violations are also reported to the compliance monitor.	Removed sentence.	NYPA	Chris de Graffenried
8	(Measure 1,2 and 3)a complex co-ordination/reporting mechanism requiring that both RA & TO informs/reports IROL/SOL violations to RC, RC then evaluates actions of RA & TO and provides directions to RA/TO to return system within limits. RA/TO to then take corrective actions as directed by RC. The fact is that following a contingency resulting in IROL violation the system has to be returned ASAP and/or within 30 minutes. -continued-	Removed RA from Version 0.	NYPA	Chris de Graffenried
8	The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in returning the system - ASAP, and in turn would create confusions thereby impacting reliability. There should only be one Reliability designation/entity i.e. RC. See our	Removed RA from Version 0.	NYPA	Chris de Graffenried

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Std	Comment	Response	Organization	Contact
	comments and position outlined in Q1 of NERC comment form re: use of one terminology RC only.			
8	(In Purpose)The last sentence should be read as follows: Violations are also reported to the compliance monitor.	Removed the sentence.	NYPA	Ralph Rufrano
8	(Measure 1,2 and 3)a complex co-ordination/reporting mechanism requiring that both RA & TO informs/reports IROL/SOL violations to RC, RC then evaluates actions of RA & TO and provides directions to RA/TO to return system within limits. RA/TO to then take corrective actions as directed by RC. The fact is that following a contingency resulting in IROL violation the system has to be returned ASAP and/or within 30 minutes. -continued- The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in returning the system - ASAP, and in turn would create confusions thereby impacting reliability. There should only be one Reliability designation/entity i.e. RC. See our comments and position outlined in Q1 of NERC comment form re: use of one terminology RC only.	RA removed from Version 0.	NYPA	Ralph Rufrano
8	Comments from draft 1 indicated that requirement 5 should remain until version 1 is composed. While the drafting team agreed with this comment, requirement 5 is still lined out to indicate deletion.	This statement is included as first sentence of Compliance Monitoring Process.	Progress Carolina	Verne Ingersoll
8	Comments from draft 1 indicated that requirement 5 should remain until version 1 is composed. While the drafting team agreed with this comment, requirement 5 is still lined out to indicate deletion.	This statement is included as first sentence of Compliance Monitoring Process.	Progress Florida	Eric Grant

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Std	Comment	Response	Organization	Contact
8	The all-important wording "Cannot withstand next contingency" that exempts multiple-contingency recovery during the 30-minute recovery period in the Policy 2 diagram A.1.1 was never translated into the version-0 Standard. Accordingly, the current Draft-2 misrepresents Policy 2, renders IROL Standard 8 inoperable in the case of multiple contingencies, and renders IROL Standard 8 inconsistent with Policy 1 and with faithful rendering of DCS Standard 2 that exempts multiple-contingency recovery.	Direct translation. Omitting figure does not affect standard.	Robert Blohm	Robert Blohm
8	In Purpose, it states that violations will be reported to the compliance program. Which program it is specifically referring to should also be stated here (e.g. NERC Compliance Program).	Removed sentence.	SRP	Gary Nolan
9	The 30-minute action time does not apply to SOL violations unless those violations have become IROL violations. The reference to SOL violations should be deleted.	In existing policy, needs to be fixed in future.	AEP	Raj Rana
9	Appears to give Transmission Operators responsibilities outside of their area of authority. This could cause a conflict.	Applies only within TOP area. This responsibility is in existing policy.	BPA-TBL	Tracy Edwards
9	Clarify if this applies to generator operators.	Only requirement for generator operator in Standard 9 is Requirement 7 to provide data.	BPA-TBL	Tracy Edwards
9	Define _voltage levels_. Clarify if this applies to Transmission only, or Transmission and Distribution.	Version 1 issue.	BPA-TBL	Tracy Edwards
9	I'd like to expand this to include UF and Volts per Hertz protection relays as well.	Version 1 issue.	BPA-TBL	Tracy Edwards
9	Reactive resources that cover _first contingency_ only sounds incomplete. It should cover first contingencies and multiple contingencies where these have a high probability of occurring. The term _high probability_ would then be defined.	This is current policy 2B 3.2. Requires Version 1 change.	BPA-TBL	Tracy Edwards
9	The 30 minute requirement conflicts with others: like the 20 min for OTC violations.	Current policy is 30 minutes.	BPA-TBL	Tracy Edwards
9	This seems to take away from the Transmission Operators capability to respond on their own.	Clarified.	BPA-TBL	Tracy Edwards

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Std	Comment	Response	Organization	Contact
9	R4 and R10 of this standard are dealing with the same thing in virtually the same way. Therefore, R10 should be merged with R4 such that the result contains everything related to this requirement.	Moved R10 up in front of R4 because of close relationship. Requirements are different - R10 required reactive resources to be under TOP control.	BPL-PBL	Deanna Phillips
9	To add clarity and reflect the sequencing of the actions involved, please move R9 to R5.2.	Version 1 issue.	BPL-PBL	Deanna Phillips
9	Remove "Reliability Authority" from Standard 009.	RA removed.	FMPA	Robert C. Williams
9	Recommend that "Reliability Authority shall direct" be replaced with "Reliability Coordinator and Transmission Operator shall direct or implement".	RA removed.	FMPA	Robert C. Williams
9	Remove "by the Transmission Operator"	Corrected.	FMPA	Robert C. Williams
9	The sentence "Violations are also reported to the compliance program." is unnecessary in the Purpose.	Removed for Std 8; does not appear in 9.	FMPA	Robert C. Williams
9	Standard 009, R5. Suggest striking the words, by the Transmission Operator, in the last line. It is redundant.	Corrected.	FRCC	Linda Campbell
9	Standard 009, R8. We do not see this requirement in current policy. It appears to be an extension of the generator requirement. We do not think this is necessary, and if it would be necessary, the information should be supplied to the RC, not the RA.	Requirement is in Policy 2B4. A passive statement was made active by assigning responsibility to generator to provide information.	FRCC	Linda Campbell
9	Standard 009, R9. Need to keep the TOP and the BA and remove the RA. The words of the first draft were more appropriate.	RA removed.	FRCC	Linda Campbell
9	Under "Measures", "Compliance Monitoring Process" and "Levels of Non-Compliance", there is a lack of a clear and consistent compliance process. While the standards and requirements are mentioned in all standards, yet in many of the standards the associated Measures, Compliance Monitoring Process and Levels of Non Compliance are missing or not specified.	Version 1 issue. These came from the existing compliance templates.	IMO	Peter Henderson
9	Under "Purpose", the last sentence be read as: "To ensure voltage levels, reactive flows, and reactive resources are monitored in real	Drafting team does not see the suggestion as clarifying the purpose. Can consider in Version 1.	IMO	Peter Henderson

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Std	Comment	Response	Organization	Contact
	time to protect equipment and to ensure/facilitate the reliable operation of the Interconnection”			
9	In the first sentence of the requirement, suggest replacing its capacitive with the capacitive in recognition of the fact that the TOP doesn't own all inductive reactive resources within its Area.	Corrected.	Mirant	Alan Johnson
9	This requirement appears to be more of a business practice than a reliability standard.	In existing policy, needs to be fixed in future.	Mirant	Alan Johnson
9	(Purpose)The last sentence be read as: “To ensure voltage levels, reactive flows, and reactive resources are monitored..... in real time to protect equipment and to ensure/facilitate the reliable operation of the Interconnection”	This omits several important requirements regarding controlling voltage and maintaining voltage profile within limits.	NPCC CP49	Guy Zito
9	(Purpose)The last sentence be read as: “To ensure voltage levels, reactive flows, and reactive resources are monitored..... in real time to protect equipment and to ensure/facilitate the reliable operation of the Interconnection”	This omits several important requirements regarding controlling voltage and maintaining voltage profile within limits.	NYPA	Chris de Graffenried
9	(Purpose)The last sentence be read as: “To ensure voltage levels, reactive flows, and reactive resources are monitored..... in real time to protect equipment and to ensure/facilitate the reliable operation of the Interconnection”	This omits several important requirements regarding controlling voltage and maintaining voltage profile within limits.	NYPA	Ralph Rufrano
9	This responsibility should be assigned to the Transmission Operator and Reliability Coordinator. The Generator Operator relies upon the Transmission Operator and Reliability Coordinator to determine appropriate levels of excitation to maintain stability. This is then communicated to the G.O. for appropriate adjustments.	From existing policy. The TOP may set the criteria, but the GOP must still operate to meet those criteria. Does not say who sets the criteria.	Southern Co.	Roman Carter
9	Purchase-Selling Entity typo	Corrected.	SPP ORWG	Scott Moore
9	The 30-minute action time does not apply to SOL violations unless those violations have become IROL violations. The reference to SOL violations should be deleted.	Added this clarification.	SPP ORWG	Scott Moore

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Std	Comment	Response	Organization	Contact
9	In this requirement and throughout most all of the Standards, the term Generator Operator is used. The NERC Glossary shows no such term. The NERC defined term is a Generation Operator. Consistency is critical.	GOP and other responsible entities added to the glossary.	SRP	Gary Nolan
10	Interchange Transaction Tagging Measure 1 sets a 100 Percent criteria for tagging. It is not feasible for an entity that implements over a thousand tags per day to have 100 Percent compliance. If you were to have an error on one tag per day you would continually be in a level 4 non-compliance. This is unacceptable to the California ISO and we will be forced to vote against Version 0 if this is included. (Note: This Standard does not include levels of non-compliance but the CAISO is assuming the NERC compliance group would develop them similar to those of Standard 13). When tagging was added to the WECC Reliability Management System (RMS) it had to be implemented using a percentage of missed tags as a basis, instead of a fixed number of missed tags to obtain approval for implementation. (Note: This Standard lists a Regional Difference for WECC. This Regional Difference only applies to Dynamic Schedules). Standard 13 - Interchange Transaction Modifications Concern is the same as Standard 10. (Note: Entities in WECC are currently exempt from Requirement 5, tagging of Dynamic Schedules, as a Regional Difference).	The existing policy and compliance template requires all transactions to be tagged. Failing to do so has a significant reliability impact because the transactions are then unknown to reliability entities.	CAISO	Ed Riley
10	Regional Differences The actual MISO Energy Flow Information Waiver approved by the OC and effective July 16, 2003 should be shown under "Regional Differences".	Waivers will be linked to the standard.	FMPA	Robert C. Williams
10	Regional Differences The actual WECC Tagging Dynamic Schedules and Indaverent Payback Waver approved by the OC and effective on November 21, 2002 should be shown under "Regional Differences".	Waivers will be linked to the standard.	FMPA	Robert C. Williams
10	The "Reliability Authority" should be removed from the Purpose.	RA removed.	FMPA	Robert C. Williams

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Std	Comment	Response	Organization	Contact
10	Standard 010, Purpose. The reliability impacts should be assessed by Reliability Coordinators instead of RA's. The WECC waiver mentioned in the Regional Differences section should be spelled out. The details of the waiver need to be included as part of the standard, not the reference to one. The policies that the waiver applies to will no longer exist.	RA removed. Waivers will be linked to the standard.	FRCC	Linda Campbell
10	Requirement R2b. It appears that this requirement changes current policy. We recommend that if a change is necessary you consider allowing for time frames longer than one hour for dynamic or reserve tags that may require longer than one hour for adjustment.	This is current policy 3A 2.1 last bullet. Refinement in Version 1.	Idaho Power	Kent McCarthy
10	Comment on Template 010 Why do we once again require the sink BA to put tags in for a commercial transaction? The example is jointly owned units, well why not the majority owner PSE or a designated PSE by the unit owners or anyone but the BA? If this unit is commercially sold to entities outside the BA boundary, how does the BA know where it ends up, who is buying it and what transmission arrangements have been made outside the BAs boundary? It seems other than emergency, reserve sharing, loss of gen/load or inadvertent, the BA should be left OUT of the tagging game. This is a commercial venture and if someone from the commercial sector fails to tag it, it doesn't flow and someone losses \$\$\$.	This requirement is current policy 3A 1.2, last sentence. Change can be made in Version 1.	IS	John Simonelli
	Bet they tag in next time. The BA has insufficient information to complete the tag beyond their borders. The problem is in today's world the CA most likely has enough information to tag a transaction like this. I am not as confident the BA under the FM will have that capability nor will they have the authority under the BA Standards. Does that standard require the BA to do anything more than balance his generation, load, losses, reserves and interchange? If I'm a BA (remember under the FM the BA does			

Std	Comment	Response	Organization	Contact
	<p>not have wide area purview like many of today's CAs have), I may not be able to do this. Should we write a standard that requires an entity to do something they can't do under the FM??? Remember this is not simply an exercise in converting the Policies to Standards, it's also supposed to integrate the FM. We will have BAs under the version 0 standards with compliance measures. I want to make sure we don't put the BA between a rock and a hard place.</p> <p>Comment on Template 011 The Purpose of templates 011 states that this standard is to provide the data to all entities needing to make a reliability assessment. In the body of the standards we specifically spell out what the TSP and BA need to do with the data. Just curious, what about what the TO needs to do, doesn't the TO (or RA/RC) do the true reliability assessment, i.e., can these MW actually reliably flow on my system at this time? The TSP Functional Model Technical Specifications document actually states, "The TSP does NOT itself have a role in maintaining system reliability in real time – that is the RA and TOs responsibility." One could argue spelling out what the TO (or RA/RC) does is more important than what the TSP does, in fact one could argue a lot of what the TSP does in this standard is "commercial" not "reliability" based.</p>			
10	<p>Comments regarding Attachment 010-2: 12. Should read Transmission Reservation Number; 17. Suggest more specificity than Contact Person. Need telephone, fax, etc.; suggest adding 21. A description of the necessity for the scheduling change.; suggest adding 13a. Transmission Reservation Profile (2.1.2.2.3)</p>	Corrected.	Mirant	Alan Johnson
10	<p>Should include the reference to the E-Tag spec in P3 A requirement 2 within this requirement. Requirements 10-13 for some reason avoid references to E-Tag. Are we relying on the NAESB</p>	<p>The reliability standard uses a generic term - tag - without restricting the tool used or how the requirement is achieved.</p>	Mirant	Alan Johnson

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Std	Comment	Response	Organization	Contact
	reference to the use of E-Tag as the preferred method for transmitting a tag? How do we ensure that transaction information makes its way into the IDC without the use of E-Tag?			
10	The addition of within the Balancing Area to this measure is a new requirement and should not be included in Versio 0.	Removed.	Mirant	Alan Johnson
10	Why isn't the non-compliance section of P3T3 not included as part of this standard?	M1 addresses the requirement for 100% of transactoins to be tagged.	Mirant	Alan Johnson
10	Need to allow for times when tags need to be submitted beyond one hour such as dynamic or reserve tags that need adjustment outside a one hour time frame. R2B appears to change current policy which was not in the scope of version zero	Version 1 improvement.	Sierra Pacific	Marylin Franz
10	In Attachment 010-2, the basic title information is listed. However, under the old Appendix 3A4, the real information required is much more detailed and listed under the titles that are currently included in V-0. It is recommended that the V-0 use the more detailed information to be clear what is required.	It is intended that the detailed information requirements are specified in the NAESB tagging procedure.	Southern Co.	Roman Carter
10	Purchase-Selling Entity is used with two different spellings in Requirements R2a, R3, R4 and R5. Usage should match the glossary and be consistent throughout the standards.	Corrected.	SPP ORWG	Scott Moore
10	Attachment 010-2 - Required Tag Data needs much more detailed information. For example, in items 4 and 16, it should state how the energy profile should be expressed (e.g. expressed in megawatts MW). In items 7 and 8, it should state that the valid POR and POD must be registered. When physical characteristics are required, an example of what that means needs to be included. Item 17 needs to state what information about a Contact person is required (e.g. name, phone, fax, email?).	It is intended that the detailed information requirements are specified in the NAESB tagging procedure.	SRP	Gary Nolan
10	In the Attachment 010-1 - Western Interconnection - New Transactions, the second table, Notes/Clarification, references the color coding of the	Corrected.	SRP	Gary Nolan

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Std	Comment	Response	Organization	Contact
	preceding table. In the conversion, the color coding was not included. Either the coding needs to be retained or the table references changed.			
10	R2B appears to change current policy which was not in the scope of version zero. If the team were to change the current policy we would ask that the team review the need for instances longer than one hour for some tag situations as there may be some dynamic, or reserve tags that need adjustment outside a one hour time frame.	Requirement comes from Policy 3AB 2.1.	WECC IS	Robert Schwermann
11	BPA believes the following are potential show-stoppers: 1. Removal of the ability of Generation Providing Entities to assess and approve or deny tags, as allowed in Policy 3. We ask that Standard 011 be modified to give back to Generation Operators and Load Serving Entities the tag approval rights that they presently have under Policy 3A. The current Policy 3A Interchange Transaction assessment No. 4 clearly states “The Generation Providing Entities, Load Serving Entities, Transmission Providers, Control Areas on the Schedule Path and other operating entities responsible for operational security shall be responsible for assessing and “approving” or “denying” Interchange transactions as requested by Purchasing-Selling Entities based on established reliability criteria and adequacy of Interconnected Operations Services and transmission rights, as well as the reasonableness of the Interchange Transaction tag.” Standard 011, R2 clearly states the “Transmission Service Providers on the Scheduling Path shall be responsible for assessing and approving the Interchange Transaction based on the established reliability criteria and adequacy of Interconnected Operating Services and transmission rights as well as the reasonableness of the Interchange Transaction tag.” Version 0, Section 011, R3 clearly states the” Balancing Authorities on the	This is a business practice that is preserved in the NAESB tagging standard.	BPL-PBL	Deanna Phillips

Std	Comment	Response	Organization	Contact
	<p>Scheduling Path shall be responsible for assessing and approving the Interchange Transaction”. However, nowhere in Section 011 (or any other Version 0 Standard) is it stated that Generation Operators and Load Serving Entities will be able to continue to assess and approve, from a reliability standpoint, all Interchange Transaction that involve their resources and loads, as they do today under Policy 3A. By removing these tag approval rights from entities such as Generator Operators and Load Serving Entities that presently have them, Standard 011 is in direct conflict with the fundamental Version 0 requirement that “changes to existing policies and procedures would not occur”. Therefore, we ask that Standard 011 be modified to give back to Generation Operators and Load Serving Entities the tag approval rights that they presently have under Policy 3A. In addition to breaking the principle of "not changing what is done today under existing policy", the policy changes proposed in tag approval rights by Standard 011 will result in lower levels of reliability. In our experience, errors in specifying the Generator or LSE on a tag are not uncommon. Furthermore, these are not the types of tag errors that either Transmission Service Providers or Balancing Authorities always have enough information to catch. On the other hand, the Generation Operators and Load Serving entities are the best ones to evaluate whether or not the tag represents an actual transaction that should be associated with their generator or load. If these errors are not caught prior to the start of the hour, then reliability is adversely impacted because IOS Services that the Balancing Authority intended to be used for either Contingency Reserves or Load Following throughout the hour must be used to follow the load/recourse balance deviations caused by the erroneous tags that the Generation Operators and Load</p>			

Std	Comment	Response	Organization	Contact
	<p>Serving Entities were not able to deny prior to delivery, as they do today. The fact that these IOS Services are then not available for their intended use definitely results in lowered levels of reliability. To assume the Generation Providing Entities or Generator Operator ONLY performs a marketing function and NOT a reliability function is an erroneous assumption. Many Generator Operators provide significant reliability to assure it is providing enough of Interconnected Operating Services to the Transmission Service Provider to properly maintain system reliability. Additionally, the Generator needs to have the ability to control its generation and provide reliable generation inputs to the Transmission Operator. They cannot do this if they are not able to have input into the approval process for the tags determining the specific transactions that their resources must service each hour. The Transmission Operator cannot have a reliable system unless the Generator has the ability to manage and control its generators. If, for example, a Generator is named on a tag as the Generator and that is in error, how exactly will the Transmission Service Provider recognize this error? The Generator Operator must have the ability to assess and approve or deny interchange transactions that commit a resource or should commit a resource, which could affect the reliability of the power system and the amount of Interconnected Operating Services. Again, the Generator Operator does not only provide a marketing function. We strongly urge the drafting team make changes to Standard 011 to include reference to Generator Operators as an entity responsible in ensuring Interchange Transaction information is correct and can make reliability assessments of approving and denying a tag. Failure to recognize the Generator Operator performing such tasks in Version 0 would be a show-stopper to BPA. 2.</p>			

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Std	Comment	Response	Organization	Contact
11	Add: f) Generating source	NAESB issue.	CAISO	Ed Riley
11	Remove "Reliability Authority(ies),"	RA removed.	FMPA	Robert C. Williams
11	The existing Policy 3 and E-Tag 1.7 Specification provide for all Generation Providing Entities to receive a copy of the tag and to optionally participate in the approval process. Both NERC's Version 0 standards and NAESB's Companion Business Practices should be reviewed to ensure that this existing capability is retained.	This is a business practice that is preserved in the NAESB tagging standard.	Idaho Power	Kent McCarthy
11	After Path, insert the following: responsible for assessing and approving or denying the Interchange Transaction.	Stated already in first sentence of Purpose.	Mirant	Alan Johnson
11	Looks like an attempt was made to provide some clarity by creating items b and c, which is one bullet in the current standard. Find the split to be more confusing and unclear.	The drafting team believes this is an accurate translation of policy.	Mirant	Alan Johnson
11	Remove references to Reliability Authority	RA removed.	Mirant	Alan Johnson
11	The existing Policy 3 and E-Tag 1.7 Specifications provide for all PSEs to receive a copy of the tag and to optionally participate in the approval process. Both NERC's Version 0 standards and NAESB's Companion Business Practices should be reviewed to ensure that this existing capability is retained.	This is a business practice that is preserved in the NAESB tagging standard.	PPL	Mark Heimbach
11	SPPC believes the generating entity needs to receive the tag. Is the version zero team satisfied that this is covered in the NAESB standard, if not it should be included in the NERC Standard. This should be included in the NERC portion of the standard.	This is a business practice that is preserved in the NAESB tagging standard.	Sierra Pacific	Marylin Franz
11	Remove the phrase "on the Scheduling Path" from the introductory comment and add it at the end of a), b), and c). Delete e).	Added in requirement 1 as appropriate.	SPP ORWG	Scott Moore
11	Subsection a) sites Scheduling Agent and is capitilized as a defined term. This is not a defined term in the NERC Glossary. Also, according to the list provided here, it would appear LSEs and PSEs will no longer be provided a copy of the tag. I do not believe that is true.	Removed Scheduling Agent.	SRP	Gary Nolan

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Std	Comment	Response	Organization	Contact
11	The existing Policy 3 and E-Tag 1.7 Specification provide for all GPEs to receive a copy of the tag and to optional participate in the approval process. Both NERC's Version 0 standards and NAESB's Companion Business Practices should be reviewed to ensure that this existing capability is retained.	This is a business practice that is preserved in the NAESB tagging standard.	WECC IS	Robert Schwermann
12	Policy 3 B2 (Sharing Interchange schedule details via a secure network) should also be included as a requirement applicable to BA. As an example see standard 34-R3 for its inclusion in this standard as well.	Requirement for transmittal of tags over a secure network was added to standard 011 (INT-002)	IMO	Peter Henderson
12	Reference should be Policy 3 A6 instead of Policy 3 B6.	Corrected.	IMO	Peter Henderson
12	Reference should be Policy 3 B4.1.2 instead of P3 4.1.2.	Corrected.	IMO	Peter Henderson
12	After Interchange Schedules, add or schedule changes.	Transaction changes are addressed in standard 013 (INT-004)	Mirant	Alan Johnson
12	In the current standard, after the phrase ...as tagged the text goes on to say the following: in accordance with Policy 3A requirement 2. This was left out presumably because of the desire to not refer to E-Tag. Note also that the correct reference is Policy 3A requirement 6, not Policy 3B.	Corrected.	Mirant	Alan Johnson
12	Referring to the Source Reference section, remove the reference to Compliance Template P3T3 as it is not referenced in the standard.	Removed.	Mirant	Alan Johnson
12	Policy 3 B2 (Sharing Interchange schedule details via a secure network) should also be included as a requirement applicable to BA. As an example see standard 34-R3 for its inclusion in this standard as well.	Requirement for transmittal of tags over a secure network was added to standard 011 (INT-002)	NPCC CP57	Guy Zito
12	Policy 3 B2 (Sharing Interchange schedule details via a secure network) should also be included as a requirement applicable to BA. As an example see standard 34-R3 for its inclusion in this standard as well.	Requirement for transmittal of tags over a secure network was added to standard 011 (INT-002)	NYPA	Chris de Graffenried
12	Policy 3 B2 (Sharing Interchange schedule details via a secure network) should also be included as a requirement applicable to BA. As an example see	Requirement for transmittal of tags over a secure network was added to standard 011 (INT-002)	NYPA	Ralph Rufrano

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Std	Comment	Response	Organization	Contact
	standard 34-R3 for its inclusion in this standard as well.			
12	Add the SPP Scheduling Agent Waiver that currently exists in policy.	Not listed under approved waivers.	SPP ORWG	Scott Moore
13	Regional Differences The actual WECC Tagging Dynamic Schedules and Indaverent Payback Waver approved by the OC and effective on November 21, 2002 should be shown under "Regional Differences".	Waivers will be linked to the standard.	FMPA	Robert C. Williams
13	Remove "Reliability Authorities" from Applicability and "Reliability Authority" from R1, R4 and R5.3	RA removed.	FMPA	Robert C. Williams
13	Standard 013, R1. We are uncertain that all of the reliability events list (a-e) are in the existing policy. Events a, d and e do appear in [Policy 3D 2] but where do events b and c come from?	b is in the opening paragraph of policy 3D2. c is from policy 3D2.1.1.	FRCC	Linda Campbell
13	Standard 013, R2. How is this requirement any different than what is already stated in R1.1.1 and R1.1.2? It appears to be redundant. If it is different and stays in, Reliability Authority needs to change to RC. In R3 the last line refers to the sink BA, should that really be sink or source. Doesn't sink or source depend on wether it is the return of generation or load? Does this need any clarification?	R2 addresses the generator or PSE option to modify its own tag if an event occurs. R1 give authority to reliability entities to modify a PSE's tag for a reliability event.	FRCC	Linda Campbell
13	Standard 013, Regional Difference. The WECC Waiver details need to be described rather than just referenced. The existing policies the waivers refer to will be gone and the details need to be part of the standard itself.	Waivers will be linked to the standard.	FRCC	Linda Campbell
13	Use current policy and resist fixing problems. Leave the issue to Ver1SDT.	Majority favor correcting deficiency.	Grant PUD	Bill Dearing
13	See prior comments to Dynamics schedules.	Majority favor correcting deficiency.	Idaho Power	Kent McCarthy
13	Per current policy (P3D, req. 2.5), regarding communication of modifications to the Interchange Transaction, entities beyond the Sink BA should be notified. Others to be included are the Source BA, the GOP, PSE, etc.	This is addressed in standards 012 ((NT-002).	Mirant	Alan Johnson
13	References to RA should be removed.	RA removed.	Mirant	Alan Johnson

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Std	Comment	Response	Organization	Contact
13	Under the Source References section, the reference should be to Compliance Template P3T4, not P3T3	Removed.	Mirant	Alan Johnson
13	See comments associated with question #3.		PPL	Mark Heimbach
13	The data retention period and reset period do not appear to be aligned. The data retention period is 3 months and the compliance reset period is 1 year. Suggest revising the data retention period and compliance reset period to be equal (i.e., 3 months).	This is acceptable.	Progress Carolina	Verne Ingersoll
13	The Levels of Non Compliance are not realistic for tags associated with dynamic schedules. The purpose of the tag is to reflect the power exchange that is currently accruing on the power system, but currently it is possible that the tag can get held or delayed which will result in a non compliance.	This is current policy.	Progress Carolina	Verne Ingersoll
13	The Levels of Noncompliance and reset period are overly stringent for Balancing Authorities with multiple dynamic schedules. As currently written, failure to update a single tag requires performance over a full calendar year without a subsequent violation to achieve full compliance. Suggest reducing the compliance reset period to 3 months.	This is current policy.	Progress Carolina	Verne Ingersoll
13	The data retention period and reset period do not appear to be aligned. The data retention period is 3 months and the compliance reset period is 1 year. Suggest revising the data retention period and compliance reset period to be equal (i.e., 3 months).	Data is only required to be kept 3 months, but reset for an identified violation can still be one year.	Progress Florida	Eric Grant
13	The Levels of Non Compliance are not realistic for tags associated with dynamic schedules. The purpose of the tag is to reflect the power exchange that is currently accruing on the power system, but currently it is possible that the tag can get held or delayed which will result in a non compliance.	Current policy and compliance template. Revise in Version 1.	Progress Florida	Eric Grant
13	The Levels of Noncompliance and reset period are overly stringent for Balancing Authorities with multiple dynamic schedules. As currently written, failure to update a single tag requires	Current policy and compliance template. Revise in Version 1.	Progress Florida	Eric Grant

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Std	Comment	Response	Organization	Contact
	performance over a full calendar year without a subsequent violation to achieve full compliance. Suggest reducing the compliance reset period to 3 months.			
13	Level 1- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 2% but less than or equal 3% of the total number of tags processed(approved tags plus denied tags) during the calendar month. For tag volumes less than or equal to 500 tags per month the number of noncompliant events was greater than 10 but less than or equal to 15. Level 2- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 3% but les	Current compliance template - Version 1 issue.	Sierra Pacific	Marylin Franz
13	Level 2- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 3% but less than or equal to 4% of the total number of tags processed during the calendar month. For tag volumes less than or equal to 500 tags per month, the number of noncompliant events was greater than 15 but less than or equal to 20.	Current compliance template - Version 1 issue.	Sierra Pacific	Marylin Franz
13	Level 3- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 4% but less than or equal to 5% of the total number of tags processed during the calendar month. For tag volumes less than or equal to 500 tags per month, the number of noncompliant events was greater than 20 but less than or equal to 25.	Current compliance template - Version 1 issue.	Sierra Pacific	Marylin Franz
13	Level 4- For tag volumes of greater than 500 tags per month the number of noncompliant events was greater than 5% of the total number of tags processed during the calendar month. For tag volumes less than or equal to 500 tags per month the number of noncompliant events was greater than 25.	Current compliance template - Version 1 issue.	Sierra Pacific	Marylin Franz
13	See prior comments on Dynamic schedules	See general response on dynamic scheduling issue.	Sierra Pacific	Marylin Franz

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Std	Comment	Response	Organization	Contact
13	The levels of noncompliance are too stringent and should be based on a percentage. The WECC RMS sanctionable criteria has been shown to be equitable and could be used as a model. Following in several text boxes is the suggested criteria which WECC has adopted. There would probably be a request for a regional difference to comply with WECC RMS criteria if NERC criteria is not compatible.	Current compliance template - Version 1 issue.	Sierra Pacific	Marylin Franz
13	Standard 013 does not address Local or Regional system conditions. Therefore an additional requirement should be included to address it: R1.1.4 [Policy 3D 2.2] When a local or regional system condition or a transmission line overload condition necessitates curtailing Interchange Transactions, the Transmission Service Provider (TSP) and the affected Balancing Authority (BA) shall implement the curtailment and coordinate the modification to the appropriate tags.	Requirement R1.2 addresses local reliability condition.	Southern Co.	Marc Butts
13	Standard 013 does not address Local or Regional system conditions. Therefore an additional requirement should be included to address it: R1.1.4 [Policy 3D 2.2] When a local or regional system condition or a transmission line overload condition necessitates curtailing Interchange Transactions, the Transmission Service Provider (TSP) and the affected Balancing Authority (BA) shall implement the curtailment and coordinate the modification to the appropriate tags.	Requirement R1.2 addresses local reliability condition.	Southern Co.	Roman Carter
13	Standard 013 does not address TLR's as current Policy does. Therefore an additional requirement should be included to address it: R1.1.3 [Policy 3D 2.1] When a system condition necessitates using a Transmission Loading Relief (TLR) procedure to curtail Interchange Transactions to ensure reliable operation of the electrical system, the Sink Balancing Authority (Sink BA) shall coordinate the modifications to the appropriate tags.	Updating per IS.	Southern Co.	Roman Carter

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Std	Comment	Response	Organization	Contact
13	Heading above R5: "Dynamic" is misspelled ("Dymamic").	Removed.	SRP	Gary Nolan
13	Level 1- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 2% but less than or equal 3% of the total number of tags processed(approved tags plus denied tags) during the calendar month. For tag volumes less than or equal to 500 tags per month the number of noncompliant events was greater than 10 but less than or equal to 15. Level 2- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 3% but les	Current compliance template - Version 1 issue.	WECC IS	Robert Schwermann
13	Level 2- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 3% but less than or equal to 4% of the total number of tags processed during the calendar month. For tag volumes less than or equal to 500 tags per month, the number of noncompliant events was greater than 15 but less than or equal to 20.	Current compliance template - Version 1 issue.	WECC IS	Robert Schwermann
13	Level 3- For tag volumes greater than 500 tags per month, the number of noncompliant events was greater than 4% but less than or equal to 5% of the total number of tags processed during the calendar month. For tag volumes less than or equal to 500 tags per month, the number of noncompliant events was greater than 20 but less than or equal to 25.	Current compliance template - Version 1 issue.	WECC IS	Robert Schwermann
13	Level 4- For tag volumes of greater than 500 tags per month the number of noncompliant events was greater than 5% of the total number of tags processed during the calendar month. For tag volumes less than or equal to 500 tags per month the number of noncompliant events was greater than 25.	Current compliance template - Version 1 issue.	WECC IS	Robert Schwermann
13	See prior ISAS comments to Dynamic schedules	See general response on dynamic scheduling issue.	WECC IS	Robert Schwermann

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Std	Comment	Response	Organization	Contact
13	The WECC has its Reliability Management System (RMS) currently in place. Its sanctionable criteria has been shown to be equitable and should be used as a model. The text in the following boxes is the criteria which WECC has adopted. WECC may request a regional difference to preserve the WECC's RMS criteria if NERC criteria is not compatible.	Regional difference can be submitted as a Version 1 revision.	WECC IS	Robert Schwermann
14	R1.1: Should clarify that the the Gen Operator needs to provide “normal and emergency capability for use”, as opposed to current wording of just “.all generation resources available for use” (i.e., stretch capability, maximum run time for emergency capability, etc.). R7: Indicates that entities shall “monitor system frequency”.....recommend adding wording to indicate frequency shall monitor system frequency at multiple points on their system.	These are Version 1 improvements not in current policy. Change to R7 would be a change from policy - address in Version 1.	ECAR	Michael Moltane
14	The "Reliability Authorities" & "Reliability Authority" needs to be removed from Standard 014. Requirement R1.1 should be rewritten to require the BA to receive information from the Generator Operator. The second R1.2 should be removed if RA is removed from Standard 014.	RA removed. Generator information is provided to BA and TOP for balancing and transmission reliability respectively.	FMPPA	Robert C. Williams
14	Standard 014, all requirements. The RA needs to be removed from each of the requirements. The TOP and BA should be the only entities these apply to. In R1.1, it should be rewritten to require the BA to obtain the information from the Generator Operator. We do not think Gen Op should be included. Please see our response to question 11.	RA removed. Generator information is provided to BA and TOP for balancing and transmission reliability respectively.	FRCC	Linda Campbell
14	We agree with and support this requirement.	Agreed.	Idaho Power	Kent McCarthy
14	Suggest global replacement of references to RA with RC.	RA removed.	Mirant	Alan Johnson
14	The proposed language represents a shift in required action from the current standard. The existing language calls for technical information pertaining to protective relays to be available in the control room. The proposed language	"shall be available in the control room" is a passive phrase. It does not indicate operators or support staff have to know where to find or how to	Mirant	Alan Johnson

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Std	Comment	Response	Organization	Contact
	suggests that this information be directly provided to each person qualifying as operating personnel. This may place a new burden on some entities.	use the information.		
14	The Reliability Coordinator needs to be included in the chain so the Area Wide assessments can be made along with the BA Wide assessments. Could not find any reference to this subject in Standards 33 through 40.	RA removed and RC added.	SMUD	Nick Hennerly
14	Again I would first argue that you should not have a subsection when there is no primary section from which to sub (e.g. R1.1 and 1.2 when there is no R1). But you certainly cannot have two subrequirements numbered identically. In the Clean Version, there are two requirements both labeled R1.2. The second of which does not even exist in the Red-lined Version.	Corrected.	SRP	Gary Nolan
14	The acronym LTC is cited, but the definition is not given nor is it a defined term in the NERC Glossary.	Spelled out.	SRP	Gary Nolan
15	Add <u>within the RC area</u> to the end of this sentence.	Added.	BPA-TBL	Tracy Edwards
15	Attachment 015-1: Need a time frame for this data, it is not measurable as it reads now.	Version 1 issue.	BPA-TBL	Tracy Edwards
15	Data is needed for more than just monitoring. Add <u>for operation and monitoring of the system</u> .	Corrected to match current policy - 'to perform operating reliability assessments and coordinate reliable operations'.	BPA-TBL	Tracy Edwards
15	In non-compliance level 1 and level 4 "responsible entity" should be changed to "Transmission Operator and Balancing Authority" and "requesting entity" should be changed to "Reliability Coordinator". In Attachment 015-1 "Reliability Authorities" should be changed to "Reliability Coordinators".	Non-compliance levels address all requirements: TOP, BA, RC, PSE providing reliability data to requesting RC, TOP, or BA. RA removed.	FMPA	Robert C. Williams
15	In the Applicability section the "Reliability Authority" should be removed. In R1 and R1.1 all "Reliability Authority" should be changed to "Reliability Coordinator". In R2 and R5 remove "Reliability Authority" and	RA removed and RC added.	FMPA	Robert C. Williams

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Std	Comment	Response	Organization	Contact
	"Reliability Authorities". In M1 remove "Reliability Authority".			
15	Standard 015, M1. The RA in this measure should be changed to RC. The current compliance template P4T2 states RC and it should remain. In both non-compliance level 1 and 4, responsible entity should be changed to BA and TOP and the data should be provided to the RC instead of requesting entity. In order to remove ambiguity, these changes are needed.	RA removed and RC added. TNon-compliance levels address all requirements: TOP, BA, RC, PSE providing reliability data to requesting RC, TOP, or BA.	FRCC	Linda Campbell
15	Standard 015, R1 and R1.1. All references to the RA should be changed to the RC in these two requirements. In R2, the RA should be removed. In R4, the reference to RA should be changed to RC.	RA removed and RC added.	FRCC	Linda Campbell
15	(Also in Levels of Non-Compliance Lv 1&4) The terminology Responsible Entity and Requesting Entity needs to be more clearly outlined/qualified.	Non-compliance levels address all requirements: TOP, BA, RC, PSE providing reliability data to requesting RC, TOP, or BA.	IMO	Peter Henderson
15	Suggest global replacement of references to RA with RC.	RA removed and RC added.	Mirant	Alan Johnson
15	The PSE should not be included within this measure. The intent of the measure being translated (from P4T2) is to apply the measure to Operating Authorities. PSEs are not Operating Authorities by definition. The RA should also not be included in this measure. The proposed measure is outside the context of Version 0.	Quoted from existing policy.	Mirant	Alan Johnson
15	This standard need to be restructured. Per the FM, the BA does not perform reliability assessments. This is the job of the RA (or the RC in the non-FM view?). It's also not clear from the FM that the TOP is performing reliability assessments. So if the purpose of the PSE providing information for the performance of reliability assessments, then such information should not be directed to the BA or TO, unless these entities are intended to only be conduits	BA does have responsibility for balancing aspects of reliability, and therefore will assess resources, reserves, etc. Reliability assessment is not limited to transmission constraints.	Mirant	Alan Johnson

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Std	Comment	Response	Organization	Contact
	for the information.			
15	National Grid USA would like to make the following recommendations to be considered when drafting the next draft of Version 0. Standard 15: There should be a requirement on generators to provide the necessary data as there is a requirement on the PSE's (R6), a paragraph R7 should be inserted which reads 'Generation Operators shall provide information requested by their host Balancing Authority and Transmission Operators to enable them to conduct operational reliability assessments and coordinate reliable operations.'	Adding generators to R7 would be an addition compared to existing policy - address in Version 1.	National Grid	Peter Lebro
15	Replace "with" in the third line with "within".	Corrected.	SPP ORWG	Scott Moore
16	A Generator Operator is not required to identify SOL's, IROL's, regional operating limitations, so how do they know what information is relevant to provide. Shouldn't they just be required to submit the outages and let the Transmission Operator and Reliability Coordinator deal with what is relevant or not? Also, shouldn't someone be responsible for approving the outage of the unit (hopefully before the day before the outage starts).	Drafting team agrees. Language was not included in existing policy or compliance template.	Entergy	Narinder Saini
16	In Purpose and Applicability "Reliability Authorities" should be replaced with "Reliability Coordinators". In R1.1 the Transmission Operator should obtain the outage data from the Generator Operator and provide the outage data to the Reliability Coordinator. In R1.2, R2, R3, R4, M1, Compliance Monitoring and Levels of Non Compliance the "Reliability Authority" should be replaced with the "Reliability Coordinator".	RA removed.	FMPA	Robert C. Williams

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Std	Comment	Response	Organization	Contact
16	Standard 016, Levels of Non-Compliance. In Level 1 and Level 4, responsible entity needs to be changed to BA or TOP and RA should be changed to RC. Responsible entity is ambiguous.	RA removed.	FRCC	Linda Campbell
16	Standard 016, M1 uses the word monitored entity. This is ambiguous and should be clarified to state the BA's and TOP's, plus RA needs to be changed to RC. In the Compliance Monitoring Process first paragraph, the RA needs to be changed to the RC. In the 3rd paragraph, the first sentence should start with IF and RA should be changed to RC throughout the paragraph.	RA removed. Monitored entity replaced with specific responsible entities.	FRCC	Linda Campbell
16	Standard 016, purpose. RA should be changed to RC. P4T4 requires info to go to the RC. R1.1 should be rewritten to require the TOP to obtain outage information from the GenOp and then provide it to their RC. In R1.2 the TOP should provide the info to the RC, not the RA and the RC, not the RA should establish the outage reporting requirements.	Agreed - changes made.	FRCC	Linda Campbell
16	Standard 016, R2 and R3. The reference to RA's should be removed and the requirement only apply to TOP and BA's. In R4, RA should be changed to the RC as the compliance template P4T4 currently states the RC.	RA removed.	FRCC	Linda Campbell
16	Same comment as above.	RA removed.	IMO	Peter Henderson
16	This is a new requirement, and hence a Version 1 standard. No place in Policy 4 does it state that a GOP or TOP shall provide planned outage information.	Requirement comes from Policy 4C1 and Compliance Template P4T4.	Mirant	Alan Johnson
16	This standard goes beyond the requirements contained in P4T4 which is being translated. The template is focused on Control Areas and their interaction with the Reliability Coordinator. This relationship has been taken down a level to a relationship between the GOP and TOP, thus creating new requirements in policy. No disagreement that such a relationship must exist, but the creation of new requirements is beyond the scope of Version 0.	ERRIS in P4T4 is interpreted to include generator operators.	Mirant	Alan Johnson

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Std	Comment	Response	Organization	Contact
16	Within the Levels of Non Compliance section, need to define responsible entity. Also, should replace RA with RC.	RA replaced by RC. Responsible entities are all listed in requirements.	Mirant	Alan Johnson
16	Standard 16:R1, Standard 37:R4: In the standards it states outage data (generation and transmission) is only required to be submitted by noon of the day ahead, the emphasis should be on submitting the data as soon as it is known but no later than noon day ahead.	Version 1 issue.	National Grid	Peter Lebro
16	The Reliability Coordinator needs to be included in the chain so the Area Wide assessments can be made along with the BA Wide assessments. Could not find any reference to this subject in Standards 33 through 40.	Added RC.	SMUD	Nick Hennery
17	R3.1 The Generator Operator should be Generator Owner and Transmission Operator should be Transmission Owner. R3.2 The Transmission Owner should coordinate with it's RA and TOP and affected TO's and BA's.	Generator operator and transmission operator are responsible for knowing status of protection systems and sharing information with others.	CAISO	Ed Riley
17	How would a Generator Operator know if a relay failure or equipment failure would reduce system reliability (isn't that the responsibility of the Transmission Operator and Reliability Coordinator). This could lead to Generator Operators not informing the Transmission Operator and Reliability Coordinator of relay or equipment failure because they did not think it mattered.	Translation of existing policy. Version 1 issue.	Entergy	Narinder Saini
17	How would a Generator Operator know if a relay failure or equipment failure would reduce system reliability (isn't that the responsibility of the Transmission Operator and Reliability Coordinator). This could lead to Generator Operators not informing the Transmission Operator and Reliability Coordinator of relay or equipment failure because they did not think it mattered.	Can identify critical protection with transmission operator. Purpose of this qualification is to not require reporting protection problems only affecting internal plant operations.	Entergy	Narinder Saini
17	In R1 and R2.2 the "Reliability Authority" should be removed. In Applicability, R3.2, R4, R5.2 and R6 the "Reliability Authority" should be changed to "Reliability Coordinator".	RA removed.	FMPA	Robert C. Williams

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Std	Comment	Response	Organization	Contact
17	Standard 017, R1 and R2.2- RA should be removed and only apply to the TOP. In R3.2 and R4, the RA should be changed to the RC. We are not sure where R5 came from, can not locate it in existing policy and we are not sure that it is clear.	RA removed. R5 is a translation of policy 4D5.	FRCC	Linda Campbell
17	Standard 017, R5.2 and R6 - RA should be replaced with RC.	RA removed.	FRCC	Linda Campbell
17	Delete the word "all".	Corrected.	IMO	Peter Henderson
17	Many of the guides in Policy 4D are in fact criterion that are not included in this std. We are of the opinion that any critical/ criteria needs to incorporated in future via urgent SAR process. The remaining should be mapped into an version 0 accompanying Reference Document.	Guides will be reestablished as guides or submitted as Version 1 SARs.	IMO	Peter Henderson
17	R5 refers to neighboring TOs while other sections refer to affected TOs. There is a need to use the same phrase in all sections of standards for purposes of consistency.	This inconsistency is in current policy. Will require Version 1 change.	IMO	Peter Henderson
17	Section B should be changed to Section D	Corrected.	IMO	Peter Henderson
17	Source reference should be Policy 4 - Section D, not Section B	Corrected.	MAPP OS	Robert Coish
17	R5 refers to neighboring TOs while other sections refer to affected TOs. There is a need to use the same phrase in all sections of standards for purposes of consistency. (in R6) Delete the word- all.	Translation of existing policy. Version 1 issue.	NPCC CP65	Guy Zito
17	Many of the guides in Policy 4D are in fact criterion that are not included in this std. We are of the opinion that any critical/ criteria needs to incorporated in future via urgent SAR process. The remaining should be mapped into an version 0 accompanying Reference Document.	Guides will be reestablished as guides or submitted as Version 1 SARs.	NPCC CP73	Guy Zito
17	Many of the guides in Policy 4D are in fact criterion that are not included in this std. We are of the opinion that any critical/ criteria needs to incorporated in future via urgent SAR process. The remaining should be mapped into an version 0 accompanying Reference Document.	Guides will be reestablished as guides or submitted as Version 1 SARs.	NYPA	Chris de Graffenried

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Std	Comment	Response	Organization	Contact
17	R5 refers to neighboring TOs while other sections refer to affected TOs. There is a need to use the same phrase in all sections of standards for purposes of consistency. (in R6) Delete the word- all.	This inconsistency is in current policy. Will require Version 1 change.	NYPA	Chris de Graffenried
17	Many of the guides in Policy 4D are in fact criterion that are not included in this std. We are of the opinion that any critical/ criteria needs to be incorporated in future via urgent SAR process. The remaining should be mapped into an version 0 accompanying Reference Document.	Guides will be reestablished as guides or submitted as Version 1 SARs.	NYPA	Ralph Rufrano
17	R5 refers to neighboring TOs while other sections refer to affected TOs. There is a need to use the same phrase in all sections of standards for purposes of consistency. (in R6) Delete the word- all.	This inconsistency is in current policy. Will require Version 1 change.	NYPA	Ralph Rufrano
17	Source reference should be Policy 4 - Section D, not Section B	Corrected.	Otter Tail	Larry Larson
17	Before the Generator Operator is held liable for being familiar with the protection schemes in its area, the applicable protection schemes should be well explained to the GO.	GOP must be knowledgeable of generator protection.	Southern Co.	Roman Carter
17	It may not be perfectly clear to the Generator Operator if a protective relay or equipment failure will reduce "system" reliability. The Transmission Operator and Reliability Coordinator need to define the scope of failures to the Generator Operator that will impact "system" reliability.	Translation of existing policy. Version 1 issue.	Southern Co.	Roman Carter
17	This requirement places the burden on the GO to report changes in transmission conditions to the TOP and host BA which could result in changes to their protection systems. The change in transmission conditions should be reported by the TOP.	Corrected.	Southern Co.	Roman Carter
18	R1: Recommend adding wording to the sentence “clear decision making authority” that such authority should be documented and incorporated into Operating Procedures so that there will not be any confusion in real time emergencies as to who is responsible for what, and to whom.	This would be a future enhancement not covered in current policy.	ECAR	Michael Moltane

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Std	Comment	Response	Organization	Contact
18	R6: Balancing Authority and Generation Operator should also be required to provide all available emergency assistance to others.	Agreed this is consistent with Policy 5A5 and the definition of Operating Authority in front of Policy 5.	ECAR	Michael Moltane
18	General Comment: Need good, clear definition of “Reliability Emergency” for this to work. Otherwise we will get into the endless and age-old discussion of “what is an emergency?”. G	Version 1 issue.	ECAR	Michael Moltane
18	General Comment/Question: Balancing Authority role is very minimal here, not even mentioned in most requirements. Is the BA roles really that irrelevant to reliability emergencies? BA is essentially replacing much of what the CA did, and the CA was critical to reliability in the pre-functional model world.	Added BA to requirement 6. This standard is mainly focused on transmission reliability. Energy and capacity emergencies are covered in separate standard.	ECAR	Michael Moltane
18	In Purpose change "normal conditions during and emergency" to "to normal conditions during and after an emergency". In Applicability, R1 and R2 the "Reliability Authority" should be replaced with "Reliability Coordinator". In R3, R4 and R5 the "Reliability Authority" should be removed. In R6 and R7 "Reliability Authority" should be replaced with "Reliability Coordinator". The second R7 should be R8.	Typo corrected - 'and' is 'an'. After the emergency is not necessary. It is implied that 'during' an emergency includes all actions to the point the system is returned to a normal condition.	FMPA	Robert C. Williams
18	Standard 018, Purpose. Would suggest the sentence to read...return the transmission system to normal conditions during and after an emergency. In R1 and R2 need to remove the RA, but keep the BA that was removed in this draft.	RA removed.	FRCC	Linda Campbell
18	Standard 018, R3. Need to keep the BA, remove the RA, and strike the phrase, ...and the Generator Operator shall comply with reliability directives issued by the Transmission Operator reliability directives, as the phrase is not needed. In R4 remove the RA.	Drafting team interprets this requirement as part of existing reporting hierarchy.	FRCC	Linda Campbell

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Std	Comment	Response	Organization	Contact
18	Standard 018, R7. In parts a and b, RA needs to be changed to RC. In part c, the TOP should notify adjacent TOP's and RA's should be removed. The last R7 (looks like it should really be R8), the reference to RA in the 5th line needs to be changed to the RC and the RA in the 6th line needs to be removed as the BA and TOP will implement firm load shedding.	RA removed.	FRCC	Linda Campbell
18	**Cont. from previous comment: For the purposes of effective implementation/enforcement of these standards, we recommended that the associated measures, compliance monitoring process and levels of non compliance should also be (a) simultaneously mapped/specified where these exist already and (b) specified/addressed in the very near future, where these do not exist today for consistency. **This comment also applies to Standards 19, 21, 26, 34 and 35.	The drafting team has attempted to translate existing compliance requirements and recommends missing compliance elements be addressed in the near future.	IMO	Peter Henderson
18	In the sentence: “Under these circumstances the Transmission Operator or Generator Operator shall immediately inform the Reliability Coordinator or Transmission Operator of the inability to perform the directive ...” The use of “or” is confusing and may create ambiguity. The specific role of entity responsible for ‘providing’ and ‘receiving’ information needs to be clarified. Should this be combined responsibility applicable to all or for any?	Version 1 enhancement.	IMO	Peter Henderson
18	Consistent with existing policy (P5A, req. 2.1) the GOP should be included within this standard as it qualifies as an Operating Authority.		Mirant	Alan Johnson
18	Global comment on standard 018: Need to settle on either RA or RC. To use both is confusing the question of who is the ultimate reliability authority.	RA removed.	Mirant	Alan Johnson
18	(Purpose)The statement should be read as follows: To ensure reliability entities have clear decision-making authority and capabilities to take appropriate actions or	Purpose corrected.	NPCC CP81	Guy Zito

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Std	Comment	Response	Organization	Contact
	direct the actions of others to return the transmission system to normal conditions during an emergency.			
18	In the sentence: “Under these circumstances the Transmission Operator or Generator Operator shall immediately inform the Reliability Coordinator, or Transmission Operator of the inability to perform the directive ...” The use of “or” is confusing and may create ambiguity. The specific role of entity responsible for ‘providing’ and ‘receiving’ information needs to be clarified. Should this be combined responsibility applicable to all or for any?	Version 1 enhancement.	NPCC CP90	Guy Zito
18	In the sentence: “Under these circumstances the Transmission Operator or Generator Operator shall immediately inform the Reliability Coordinator, or Transmission Operator of the inability to perform the directive ...” The use of “or” is confusing and may create ambiguity. The specific role of entity responsible for ‘providing’ and ‘receiving’ information needs to be clarified. Should this be combined responsibility applicable to all or for any?	Version 1 enhancement.	NYPA	Chris de Graffenried
18	(Purpose)The statement should be read as follows: To ensure reliability entities have clear decision-making authority and capabilities to take appropriate actions or direct the actions of others to return the transmission system to normal conditions during an emergency.	Corrected purpose.	NYPA	Chris de Graffenried
18	In the sentence: “Under these circumstances the Transmission Operator or Generator Operator shall immediately inform the Reliability Coordinator, or Transmission Operator of the inability to perform the directive ...” The use of “or” is confusing and may create ambiguity. The specific role of entity responsible for ‘providing’ and ‘receiving’ information needs to be clarified. Should this be combined responsibility applicable to all or for any?	Version 1 enhancement.	NYPA	Ralph Rufrano

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Std	Comment	Response	Organization	Contact
18	(Purpose)The statement should be read as follows: To ensure reliability entities have clear decision-making authority and capabilities to take appropriate actions or direct the actions of others to return the transmission system to normal conditions during an emergency.	Corrected purpose.	NYPA	Ralph Rufrano
18	The last part of the purpose appears to be missing a word or two (...return the transmission system normal conditions during and emergency).	Corrected.	Progress Carolina	Verne Ingersoll
18	The last part of the purpose appears to be missing a word or two (...return the transmission system normal conditions during and emergency).	Corrected.	Progress Florida	Eric Grant
18	Clarify in Standard 018 that Reliability Coordinators can also issue a directive to a Reliability Authority. This is allowed as stated in Standard 037, R8. In general, review the whole Version 0 even further to clarify the distinction of Reliability Coordinators and Reliability Authorities.	RA removed.	Puget	Mike Hunter
18	The Reliability Coordinator needs to be included in the chain so the Area Wide assessments can be made along with the BA Wide assessments. This may be covered in Standard 33.	RC added.	SMUD	Nick Hennery
18	There are times when a Generator Operator must act quickly and may not have time to notify the Transmission Operator. There needs to be an exception here (like that listed in 7C for the RA and TOP) for emergency situations that allows follow up notification by the GO.	Version 1 enhancement.	Southern Co.	Roman Carter
18	There are two Requirement 7's in Standard 18. The second Requirement 7 should be re-labeled Requirement 8.	Corrected numbering.	Southern Co.	Roman Carter
18	Replace "and" with "an" in the last line.	Corrected.	SPP ORWG	Scott Moore
19	The "Reliability Authorities" and "Reliability Authority" should be removed from Standard 019, 020, 021, 022, 023, 024, 025, 026, 027 and 028. In Attachment 020-1 A 1 the "Reliability Authority's" should be changed to "Reliability Coordinator's". In Attachments 022-1 and 022-2 The "Reliability Authorities" and "Reliability	RA removed.	FMPA	Robert C. Williams

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Std	Comment	Response	Organization	Contact
	Authority" should be removed. Also in Attachment 027-4 "reliability coordinators" replace "Reliability Coordinators".			
19	Standard 019, Purpose. Need to change the RA to RC. RA needs to be removed from all requirements.	RA removed.	FRCC	Linda Campbell
19	- The reference to Policy 5B 2.1 should be Policy 5B 2.1.1	Corrected.	IMO	Peter Henderson
19	Global comment on standard 019: Need to settle on either RA or RC. To use both is confusing the question of who is the ultimate reliability authority.	RA removed.	Mirant	Alan Johnson
20	In Sections 2.4, 2.4.4, 3.4, 3.4.2, 3.5 and 3.5.1 of Attachment 020-1 of Standard 020, replace OSL with SOL/IROL terminology.	Corrected.	AEP	Raj Rana
20	Attachment 020-1 - Energy Emergency Alerts BA and Resource Sharing Groups need to be added in the Introduction first sentence after Load Serving Entity. RA needs to be added to A.2. as a party to be notified. RA needs to be added to B.2.2 as a party to be notified. RA needs to be added to B.3.5.1 as a party to be notified.	Version 1 change.	CAISO	Ed Riley
20	Attachment 020-1 - Energy Emergency Alerts The following locations, B.3.6 and 4C, refer to NERC Policy 9B. This is actually now in NERC Policy 5. These references to NERC Policies will be invalid after Version 0 is in place.	Policy references removed.	CAISO	Ed Riley
20	"Operating Security Limits"... Should these read "Security Operating Limits (SOL)"?	Changed OSL to SOL and IROL terminology.	Cinergy	Doug Hils
20	Also uses "Operating Security Limits". As stated above should this be Security Operating Limit (SOL)?	Changed OSL to SOL and IROL terminology.	Cinergy	Doug Hils
20	Also uses "Operating Security Limits". As stated above should this be Security Operating Limit (SOL)?	Changed OSL to SOL and IROL terminology.	Cinergy	Doug Hils
20	States, "...Energy Deficient Entity who has declared an Energy Emergency... Once again as above, this should read, "...Energy Deficient Entity who has "requested declaration of" an Energy Emergency..." Also uses "Operating Security Limits". As stated above should	Changed OSL to SOL and IROL terminology.	Cinergy	Doug Hils

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Std	Comment	Response	Organization	Contact
	this be Security Operating Limit (SOL)?			
20	States, "...shall notify its respective Reliability Authority and downgrade the Alert." It should read "...shall notify its respective Reliability Authority "to" downgrade the Alert." The EDE does not declare or downgrade the Alerts. Also uses "Operating Security Limits". As stated above should this be Security Operating Limit (SOL)?	Changed OSL to SOL and IROL terminology.	Cinergy	Doug Hils
20	States, "Before declaring an Alert 3, the Energy Deficient..." Should this read Before "requesting" an Alert 3... The Energy Deficient Entity requests the declaration of an Alert, whereas the Reliability Authority declares the Alert.	Corrected.	Cinergy	Doug Hils
20	States, "Evaluating and mitigating...review all "Operating Security Limits"..." Should these read "Security Operating Limits (SOL)"?	Changed OSL to SOL and IROL terminology.	Cinergy	Doug Hils
20	Standard 020, M1 and M2. Need to remove the RA and TOPs should be added back in. Both of these measures appear to be more of compliance monitoring methods rather than measures. Need to evaluate if they should be labeled as such and not have any measures. RA needs to be removed from the Data Retention statement.	RA removed.	FRCC	Linda Campbell
20	Standard 020. Need to remove RA from the purpose and from R1, R2 and R3. R4- we can not find this in P5T1. It looks like it is included to be a comparable requirement for the RA or RC that the BA has in R3. Since RA should be removed, and RC is covered under the policy 9 standards, we suggest removing R4 completely.	RA removed.	FRCC	Linda Campbell
20	Attachment: A.1 Change this title to "Initiation" so the title isn't used in the first sentence.	Corrected.	Grant PUD	Bill Dearing
20	Attachment: A.2 Use "Area of Responsibility" when referring to the Reliability Coordinator's Area. Use of Reliability Area could cause	RC Area is a defined term.	Grant PUD	Bill Dearing

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Std	Comment	Response	Organization	Contact
	misunderstandings. This should apply throughout the Ver0 Standards Document.			
20	Attachment: B.2.2 Add Reliability Authorities.	RA removed.	Grant PUD	Bill Dearing
20	Attachment: B.2.4.4 Add Reliability Authorities. Strike Reliability Areas.	RA removed.	Grant PUD	Bill Dearing
20	Attachment: B.2.6.3 DSM is not defined.	Spelled out.	Grant PUD	Bill Dearing
20	Attachment: B.3.5.1 and B.4.1 Add Reliability Authorities.	RA removed.	Grant PUD	Bill Dearing
20	Attachment: B.3.6 and Section C have references to old Policies.	Policy references removed.	Grant PUD	Bill Dearing
20	Title: The letter "O" is used instead of the number "0."	Corrected.	Grant PUD	Bill Dearing
20	IPC supports the migration of Policy 9 requirements for EEAs into Standard 20.	Agreed.	Idaho Power	Kent McCarthy
20	A minor typo correction as follows: O20 be read as 020.	Corrected.	IMO	Peter Henderson
20	R7(b) should be read as Deploying/utilizing all available operating reserve R7(f) should be read as Reducing/shedding load,	Version 1.	IMO	Peter Henderson
20	Under "Attachment 020-1 (A-1), there is another example of confusions being created due to dual roles. Only 'RC' terminology should have been used, see our comments outlined in Q1 above. The requirements and sections of this standard outlines that EEA has to be issued by RC and the RA has to make request to RC to issue EEA. The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in issuing EEA's thereby impacting reliability.	RA removed.	IMO	Peter Henderson
20	Under "Levels of Non-Compliance", it is not clear whether the term "plans" mentioned in Level 3 and Level 4 pertain to the requirements R1 to R10 of this standard or refer to plans prescribed in associated std-025. It appears that compliance items are not mapped as per applicable requirements.	Version 1.	IMO	Peter Henderson
20	Measures 1 and 2 are not in the existing Policy 5 and should be removed from standard 020.	Measures are from compliance template PST1.	MAPP OS	Robert Coish

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Std	Comment	Response	Organization	Contact
20	Global comment on standard 020: Need to settle on either RA or RC. To use both is confusing the question of who is the ultimate reliability authority.	RA removed.	Mirant	Alan Johnson
20	(Levels of non-compliance)It is not clear whether the term “plans” mentioned in Level 3 and Level 4 pertain to the requirements R1 to R10 of this standard or refer to plans prescribed in associated std-025. It appears that compliance items are not mapped as per applicable requirements.	Version 1.	NPCC CP106	Guy Zito
20	(In Attachment 020-1(A-1))This is another example of confusions being created due to dual roles. Only ‘RC’ terminology should have been used, see our comments outlined in Q1 above. The requirements and sections of this standard outlines that EEA has to be issued by RC and the RA has to make request to RC to issue EEA. The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in issuing EEA’s thereby impacting reliability.	RA removed.	NPCC CP114	Guy Zito
20	R7(b) should be read as Deploying/utilizing all available operating reserve R7(f) should be read as Reducing/shedding load,	Version 1.	NPCC CP98	Guy Zito
20	(In Attachment 020-1(A-1))This is another example of confusions being created due to dual roles. Only ‘RC’ terminology should have been used, see our comments outlined in Q1 above. The requirements and sections of this standard outlines that EEA has to be issued by RC and the RA has to make request to RC to issue EEA. The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in issuing EEA’s thereby impacting reliability.	RA removed.	NYPA	Chris de Graffenried
20	(Levels of non-compliance)It is not clear whether the term “plans” mentioned in Level 3 and Level 4 pertain to the requirements R1 to R10 of this standard or refer to plans prescribed in associated	Version 1.	NYPA	Chris de Graffenried

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Std	Comment	Response	Organization	Contact
	std-025. It appears that compliance items are not mapped as per applicable requirements.			
20	R7(b) should be read as Deploying/utilizing all available operating reserve R7(f) should be read as Reducing/shedding load,	Version 1.	NYPA	Chris de Graffenried
20	(In Attachment 020-1(A-1))This is another example of confusions being created due to dual roles. Only 'RC' terminology should have been used, see our comments outlined in Q1 above. The requirements and sections of this standard outlines that EEA has to be issued by RC and the RA has to make request to RC to issue EEA. The above complicated RC and RA related reporting / co-ordination requirements/roles have a tendency to create delays in issuing EEA's thereby impacting reliability.	RA removed.	NYPA	Ralph Rufrano
20	(Levels of non-compliance)It is not clear whether the term "plans" mentioned in Level 3 and Level 4 pertain to the requirements R1 to R10 of this standard or refer to plans prescribed in associated std-025. It appears that compliance items are not mapped as per applicable requirements.	Version 1.	NYPA	Ralph Rufrano
20	R7(b) should be read as Deploying/utilizing all available operating reserve R7(f) should be read as Reducing/shedding load,	Version 1.	NYPA	Ralph Rufrano
20	Measures 1 and 2 are not in the existing Policy 5 and should be removed from standard 020.	Measures are from compliance template P5T1.	Otter Tail	Larry Larson
20	In Attachment 020-1 of Standard 020, change "NERC web-site" to RCIS in Sections 2.1, 2.2, 3.1 and 3.2.	Version 1.	SPP ORWG	Scott Moore
20	In Section B, Introduction of Attachment 020-1, reference is made to the NERC Operating Policies. This needs to be changed to NERC Reliability Standards.	Policy references removed.	SPP ORWG	Scott Moore
20	In Sections 2.4, 2.4.4, 3.4, 3.4.2, 3.5 and 3.5.1 of Attachment 020-1 of Standard 020, replace OSL with SOL/IROL terminology.	OSL terminology replaced.	SPP ORWG	Scott Moore

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Std	Comment	Response	Organization	Contact
20	Attachment 020-1 - Energy Emergency Alerts, Section 3.6 - Reporting, states that the report that must be filled out is in appendix 9B, Section C, which will no longer exist. Section C of this same attachment, refers to NERC Policy 9B section B paragraph 3.5. That policy will no longer exist when this Standard becomes active.	Policy references removed.	SRP	Gary Nolan
20	Attachment 020-1. Energy Emergency Alerts. Period at the end of sentence. (page 020-6)	Corrected.	SRP	Gary Nolan
20	Attachment 020-1. Energy Emergency Alerts Notification. (Line 2) "Authorities" misspelled ("Authorizes")	Corrected.	SRP	Gary Nolan
20	Heading should be 020 instead of O20	Corrected	SRP	Gary Nolan
20	Attachment 020-1 - replace "Operating Security Limits" with "System Operating Limits" throughout the attachment	OSL terminology replaced.	TVA	Jerry Nicely
20	Delete "Reliability Coordinator" 3 times Delete "Reliability Authority" 3 times	RA removed.	TVA	Jerry Nicely
20	Insert after Reliability Coordinator, "who has a Balancing Authority"	Version 1.	TVA	Jerry Nicely
20	Remove "Reliability Coordinator". RC does not own or operate generation. BA has a capacity and energy emergency plan. RC implements EEA process. RA needs to come out.	Version 1.	TVA	Jerry Nicely
20	Attachment 020-1 - replace "Operating Security Limits" with "System Operating Limits" throughout the attachment	OSL terminology replaced.	TVA	Kathleen Davis
20	Delete "Reliability Coordinator" 3 times Delete "Reliability Authority" 3 times	RA removed.	TVA	Kathleen Davis
20	Insert after Reliability Coordinator, "who has a Balancing Authority"	Version 1.	TVA	Kathleen Davis
20	Remove "Reliability Coordinator". RC does not own or operate generation. BA has a capacity and energy emergency plan. RC implements EEA process. RA needs to come out.	Version 1.	TVA	Kathleen Davis
20	Attachment 020-1 A. 2. Change Balancing Authorizes to Balancing Authority.	Corrected.	WE Energies	Howard Rulf
21	Standard 021. Need to remove RA from all requirements.	RA removed.	FRCC	Linda Campbell
22	Standard 022 In R2, R3 and R3.1 need to remove RA. R3.2 is not really a requirement. It looks as if it should be added to the end of R3.1. Remove RA	RA removed.	FRCC	Linda Campbell

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Std	Comment	Response	Organization	Contact
	from R3.3, R3.4 and R4. Also remove RA from attachment 022-1			
22	Attachment 022-1. See comments for std 8, R1.	Corrected.	Idaho Power	Kent McCarthy
22	Under "Attachment 1" of "Attachment 022-2", incident No. 7 and footnote should be modified to reflect IROL and a new reference.	Corrected.	IMO	Peter Henderson
22	(In Attachment 1 of 022-2) Incident No. 7 and footnote should be modified to reflect IROL and a new reference.	Corrected.	NPCC CP122	Guy Zito
22	(In Attachment 1 of 022-2) Incident No. 7 and footnote should be modified to reflect IROL and a new reference.	Corrected.	NYPA	Chris de Graffenried
22	(In Attachment 1 of 022-2) Incident No. 7 and footnote should be modified to reflect IROL and a new reference.	Corrected.	NYPA	Ralph Rufrano
22	The reporting requirements under this Standard should remain with the Regional Reliability Organization or RC/RA. It should not be the obligation of a Generator Operator or Load Serving Entity. The involved GO or LSE should provide information to the reporting authority but not be the ones responsible for ultimately submitting the report.	This is current policy, need to review in Version 1.	PPL	Mark Heimbach
22	Current Policy requires the Operating Authorities to make the reports to either NERC and possibly to DOE. Is this appropriately applied to the Generator Operator or is it more appropriate for the TOP or BA to report? Does this include Nuclear Plants who already have reporting requirements specified by nuclear regulations?	This is current policy, need to review in Version 1.	Southern Co.	Roman Carter
22	Attachment 022-1 - replace "Operating Security Limits" with "Interconnected Reliability Operating Limit" .	Corrected.	TVA	Jerry Nicely
22	Attachment 022-1 - replace "Operating Security Limits" with "Interconnected Reliability Operating Limit" .	Corrected.	TVA	Kathleen Davis
23	It is almost impossible for us to be aware of all acts of actual or potential sabotage that could affect multi-sites with in the larger portions of the interconnection. This should be reduced to each entity's area of ownership	Version 1.	Alliant	Kenneth Goldsmith

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Std	Comment	Response	Organization	Contact
23	There is no definition of sabotage. Suggest using the following definition; Sabotage means a verifiable deliberate act that is directed against a company's facilities or their portions of the interconnection that could directly or indirectly endanger public health or the reliability of the system.	Version 1.	Alliant	Kenneth Goldsmith
23	States, "...shall have procedures for making operating...". Should read, "shall have procedures for "the recognition of and for" making operating...".	Corrected.	Cinergy	Doug Hils
23	Standard 023 Remove RA from all requirements.	RA removed.	FRCC	Linda Campbell
23	Policy 5, Section G, Requirement 1 has been mapped into Draft 2, but excludes a secondary requirement contained in the current NERC Policy 5G, R1. That being: "Procedures shall also be established for the communication of information concerning sabotage events to the appropriate parties in the Interconnection.	Corrected.	IMO	Peter Henderson
23	Requirement 1 does not appear to be updated to include "their" as indicated on draft 1 responses.	Corrected.	Progress Carolina	Verne Ingersoll
23	Requirement 1 does not appear to be updated to include "their" as indicated on draft 1 responses.	Corrected.	Progress Florida	Eric Grant
24	Remove the words (to be prepared) from the first sentence of the Purpose. Current operating plans and procedures implies they have been prepared, implemented and are up to date.	Corrected.	BPA-TBL	Tracy Edwards
24	Standard 024. Remove RA from all requirements. R4 should be reworded to place the requirement on the BA to obtain the information from the other entities. (see response to question 11) We recommend adding BA to R17, then both the TOP and BA report to the RC. Then you can remove R18 as it will be redundant.	RA removed. Drafting team believes current language captures intent of policy 6A1, 1.1 and 1.2. R18 is broader than R17, covering all information in R1 to R17.	FRCC	Linda Campbell
24	The translation does not appear correct in referencing all requirements 1-17 in order to be consistent with Policy 6A 6.4. Shouldn't requirements 15-17 only be referenced?	Drafting team interprets this requirement as part of existing reporting hierarchy.	MAPP OS	Robert Coish

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Std	Comment	Response	Organization	Contact
24	Concerned that the translation from Control Area to BA or TOP creates a new requirement for the GOP. The proposed language allows the possibility of the GOP having to perform tests at the request of both the BA and TOP. The GOP should only be required to perform 2 seasonal capability tests per year (winter and summer) within pre-defined parameters.	The language used was 'verification' which was not intended to specify 'testing'. Issue can be clarified in Version 1. Language is same as Policy 6A5.	Mirant	Alan Johnson
24	Global comment on standard 024: Need to settle on either RA or RC. To use both is confusing the question of who is the ultimate reliability authority.	RA removed.	Mirant	Alan Johnson
24	Standard 24:R3, R4, R5, R12, R17: Confidentiality of information should not be a factor when it comes to reliability – this needs to be addressed otherwise Companies may hide behind the confidentiality clause and not provide the data necessary to conduct operational reliability assessments and coordinate reliable operations.	Version 1.	National Grid	Peter Lebro
24	Take the TSP out of this standard and put in the transmission owner as it is currently identified in Policy 6. The generator owner will coordinate with the BA and the Transmission owner will coordinate with the TOP.	TOP does the normal operations coordination addressed in this standard.	NPPD	Alan Boesch
24	Policy 6A2.5 states that "All generator owners shall operate their plant so as to adhere to ramp schedules." Proposed Standard 24R10 deletes this statement and appears to move the responsibility for adhering to ramp schedules to the Balancing Authority. Is this apparent transfer of responsibility what is intended? If so, how is it supposed to work? Comment continued in next entry field (below). The definition of Balancing Authority indicates a high level entity - how will that entity exercise control down to the plant level where the ramping is actually done? Should a definition of "ramp" and "ramp schedules" be included in the glossary?	This requirement was removed after comments on Draft 1 indicating the Generator Operator does not control the ramp - the drafting team agreed.	PPL	Mark Heimbach
24	Capitalize Transmission Operator in the second line.	Corrected.	SPP ORWG	Scott Moore

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Std	Comment	Response	Organization	Contact
25	Change to read: The Reliability Authority, Transmission Operator, and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall make emergency plans available to its Reliability Authority and Reliability Coordinator. The Reliability Authority shall make emergency plans available to its Reliability Coordinator and neighboring Reliability Authorities.	Make available' would be a policy change from current 'provide'.	Cinergy	Doug Hils
25	Providing copies of emergency plans to the TO, BA, & RC could result in Cyber & Homeland Security issues. Many plans contain confidential & proprietary information. Cinergy has 7 emergency plans and 11 interconnects, IRC for a total of 84 copies. AEP has 18 interconnects. MISO would receive copies of emergency plans from 25 entities times the number of plans per entity.	This is a statement of current policy. The drafting team assumes appropriate confidentiality agreements, including the NERC confidentiality agreement, are in place to share reliability information.	Cinergy	Doug Hils
25	Standard 025 M1-M2. These are not really measures are are shown as data retention items in compliance template P6T1. This standard may not have any associated measures. Remove RA from the measures (really data retention) and the self assessment note in the compliance monitoring process.	RA removed. Can review measures in Version 1.	FRCC	Linda Campbell
25	Standard 025. Remove RA from all requirements. R3 should apply to both the TOP and the BA. In R4.3, we would suggest rewording to state.....Develop, maintain and implement a set of plans to implement load shedding for operating emergencies. In R4.4, we would suggest rewording to....Develop, maintain, and implement a set of plans to implement System Restoration after operating emergencies.	RA removed. Corrected language in R4. The drafting team interprets the functional model and existing policy as giving responsibility for responding to IROL violations to TOP, not BA.	FRCC	Linda Campbell
25	Standard 025. In R5.1, the word consider should be replaced with ..must address.. since the levels of non-compliance are based on including numbers of items from attachment 025-1. The last sentence of R6 should be deleted since requirments for RAs will be removed. In	Corrected, since these items are in the compliance template they are included in Version 0 as requirements.	FRCC	Linda Campbell

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Std	Comment	Response	Organization	Contact
	R7, the TOP and BA shall coordinate with the RC, not the RA. For R7.1-R7.4 the lead in of the entities is not needed since it is already stated in R7 and are the listing of steps.			
25	Under "Levels of Non-Compliance", The levels of non-compliance have been translated based on template P6T1. P6T1's non-compliance were based on 14 elements/requirements of plan whereas, the attachment 025-01 now includes 20 elements (re: consideration in development of Emergency Plans).	Reduced the elements to match the compliance template.	IMO	Peter Henderson
25	As I stated in the comments on the first draft "Develop, maintain, and implement a set of plans to mitigate operating emergencies for load shedding." does not make any sense and should be changed to read "Develop, maintain a set of plans to implement load shedding for operating emergencies"	Language corrected.	NPPD	Alan Boesch
25	As I stated in the comments on the first draft "Develop, maintain, and implement a set of plans to mitigate operating emergencies for system restoration." does bnot make any sense and should be changed to read "Develop, maintain a set of plans to implement System Restoration"	Language corrected.	NPPD	Alan Boesch
25	Although the Drafting Team acknowledged that there is much repetition throughout these standards and that it is hoped that much will be eliminated through this process, this particular Requirement is an exact duplicate of Standard 031 R1.2. When the duplication is this obviously, I believe it must be handled in this process and one requirement eliminated.	Agreed. Duplication removed here. A new requirement 1 added in standard 031 to address the requirement for staffing with trained personnel.	SRP	Gary Nolan
25	Correct sentence structure to say - its two most recent annual self-assessments.	Corrected.	SRP	Gary Nolan

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Std	Comment	Response	Organization	Contact
26	Delete “for underfrequency or undervoltage conditions.” Existing Policy 6 does not specify that Operating Authorities must have a plan for both underfrequency and undervoltage conditions. Rather, it is vague and states that we are to have plans, and that automatic load shedding is to be initiated at the time the system frequency or voltage has declined to an agreed-to level. ECAR specifies in Document 3 the agreed-to level to initiate automatic load shedding for system frequency in the ECAR Region. ECAR has no requirements for undervoltage loadshedding, thus no agreed-to level for members to initiate such action at this time. While this may be a deficiency in today’s Operating Policy, it is outside the scope of the Version 0 Drafting Team to address this deficiency.	The drafting team does not agree with intentionally making a standard vague. Nonetheless, the drafting team believes R2 is a restatement of policy 6B 1.2. As stated, the requirement does not say UVLS is required. It says automatic load shedding must be provided, triggered by under frequency or under voltage conditions - a similar scope to that of 6B 1.2.	ECAR	Dan Bozio
26	Insert the words “one or more of” as follows into R4: “R4 [Policy 6C 1.2 and 1.2.1] A Reliability Authority, Transmission Operator or Balancing Authority shall consider "one or more of" these factors in designing an automatic load shedding scheme: frequency, rate of frequency decay, voltage level, rate of voltage decay, or power flow levels.” As presently worded, 026 R4 of Version 0 implies all 5 of the factors are to be included in the automatic load shedding scheme. Addition of “one or more of” is an exact translation of Policy 6C 1.2.1. and preserves today’s interpretation of this section of Policy.	Corrected to match policy.	ECAR	Dan Bozio
26	Standard 026. Remove RA from all requirements.	RA removed.	FRCC	Linda Campbell
26	Under "Purpose", The second line in this section should be read as: Transmission Operator operating with insufficient generation or transmission capacity shall have the capabilities and authority to shed load rather than risk		IMO	Peter Henderson
26	(In Purpose)The second line in this section should be read as: Transmission Operator operating with insufficient	Adjusted purpose, but did not turn it into a requirement statement.	NPCC CP130	Guy Zito

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Std	Comment	Response	Organization	Contact
	generation or transmission capacity shall have the capabilities and authority to shed load rather than risk ...			
26	(In Purpose)The second line in this section should be read as: Transmission Operator operating with insufficient generation or transmission capacity shall have the capabilities and authority to shed load rather than risk ...	Adjusted purpose, but did not turn it into a requirement statement.	NYPA	Chris de Graffenried
26	(In Purpose)The second line in this section should be read as: Transmission Operator operating with insufficient generation or transmission capacity shall have the capabilities and authority to shed load rather than risk ...	Adjusted purpose, but did not turn it into a requirement statement.	NYPA	Ralph Rufrano
26	Should read "The Reliability Authority, Transmission Operator,...	RA removed.	SPP ORWG	Scott Moore
27	R10.5 should not include d). Part d) should be under a separate R10.6 because it is not necessary a condition for resynchronizing isolated area(s), and is therefore a better translation of Policy 5E. 1.	Changed 'where' to 'if' to indicated load shedding is not a necessary condition.	BC Transmission	Martin Huang
27	Standard 027. Remove RA from all requirements and the compliance monitoring process. For Level 2 and Level 4, instead of just stating should address a number of requirements, it should really refer to the elements listed in attachment 027-1. Need to tell where the requirements are.	RA removed. Levels of non-compliance corrected.	FRCC	Linda Campbell
27	Attachment: Paragraphs 8 and 9 need Reliability Coordinators and Operating Entities capitalized.	Corrected RC. Operating entities is not a defined term.	Grant PUD	Bill Dearing
27	Under "Levels of Non-Compliance", it appears that there is a reference to the elements outlined in Attachment 027-01. This needs to be clarified. Accordingly, the levels of non-compliance should include the revised wording with specific reference to remove any ambiguity. e.g. Level 1: Plan (elements of Attachment 027-01) exists but is not.....	Corrected.	IMO	Peter Henderson
27	Compliance Monitoring Process,Self-Certification,item 4, appears incorrect as it appears to have been translated from P6T3 and refers to contingency plan rather than restoration plan.	Corrected.	MAPP OS	Robert Coish

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Std	Comment	Response	Organization	Contact
27	(Levels of non-compliance)It appears that the levels of non-compliance refer to the elements outlined in Attachment 027-01. This needs to be clarified. Accordingly, the levels of non-compliance should include the revised wording with specific reference to remove any ambiguity. e.g. Level 1: Plan (elements of Attachment 027-01) exists but is not...	Corrected.	NPCC CP138	Guy Zito
27	(Levels of non-compliance)It appears that the levels of non-compliance refer to the elements outlined in Attachment 027-01. This needs to be clarified. Accordingly, the levels of non-compliance should include the revised wording with specific reference to remove any ambiguity. e.g. Level 1: Plan (elements of Attachment 027-01) exists but is not...	Corrected.	NYPA	Chris de Graffenried
27	(Levels of non-compliance)It appears that the levels of non-compliance refer to the elements outlined in Attachment 027-01. This needs to be clarified. Accordingly, the levels of non-compliance should include the revised wording with specific reference to remove any ambiguity. e.g. Level 1: Plan (elements of Attachment 027-01) exists but is not...	Corrected.	NYPA	Ralph Rufrano
27	5.c To be consistent with Standard 040 R5, this requirement needs to be modified to state that the Reliability Coordinator approval must be obtained prior to resynchronization of major islands	Corrected.	TVA	Jerry Nicely
27	5.c To be consistent with Standard 040 R5, this requirement needs to be modified to state that the Reliability Coordinator approval must be obtained prior to resynchronization of major islands	Corrected.	TVA	Kathleen Davis
28	Standard 028. Remove RA from R1, measures and compliance monitoring process. It appears that R1 h and R1i really concern restoration rather than back up control centers. Perhaps these need to be included in Standard 027. The source reference for the Levels of	RA removed. Items h and I were related to restoration and were removed.	FRCC	Linda Campbell

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Std	Comment	Response	Organization	Contact
	non-compliance show P6T2, and it should be P6T3. Need to make that correction.			
28	The term RC needs to be inserted into section of Applicability.	Agreed - Policy 6E is also addressed to RCs.	IMO	Peter Henderson
28	Under "Levels of Non-Compliance", the reference to Requirement R1 should be corrected to P6T3 instead of P6T2. More important, the levels of non-compliance have been translated/mapped incorrectly from the P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility). The levels of non-compliance should be corrected by mapping/translating the levels from P6T3 instead of P6T2.	Corrected.	IMO	Peter Henderson
28	Under "Purpose", the following wording is suggested: Each reliability entity shall have a plan to continue	Clarified language.	IMO	Peter Henderson
28	Level of Non-Compliance. This appears to be referencing P6T2 language. Shouldn't this be translated from P6T3?	Corrected.	MAPP OS	Robert Coish
28	tems h,i appear to be translated incorrectly as they seem to be from P6T2(assessment notes 8 & 9) rather than P6T3. Item i specifies restoration plan rather than contingency plan.	Corrected.	MAPP OS	Robert Coish
28	(In Purpose)The following wording is suggested: Each reliability entity shall have a plan to continue ...	Clarified language.	NPCC CP146	Guy Zito
28	The term RC needs to be inserted into section of Applicability.	Added RC.	NPCC CP154	Guy Zito
28	(Levels of non-compliance)The reference to Requirement R1 should be corrected to P6T3 instead of P6T2 More important, the levels of non-compliance have been translated/mapped incorrectly from the P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility). The levels of non-compliance should be corrected by mapping/translating the levels from P6T3 not P6T2.	Corrected.	NPCC CP162	Guy Zito
28	(In Purpose)The following wording is suggested: Each reliability entity shall have a plan to continue ...	Clarified language.	NYPA	Chris de Graffenried

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Std	Comment	Response	Organization	Contact
28	(Levels of non-compliance)The reference to Requirement R1 should be corrected to P6T3 instead of P6T2 More important, the levels of non-compliance have been translated/mapped incorrectly from the P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility). The levels of non-compliance should be corrected by mapping/translating the levels from P6T3 not P6T2.	Corrected.	NYPA	Chris de Graffenried
28	The term RC needs to be inserted into section of Applicability.	Corrected.	NYPA	Chris de Graffenried
28	(In Purpose)The following wording is suggested: Each reliability entity shall have a plan to continue ...	Clarified language.	NYPA	Ralph Rufrano
28	(Levels of non-compliance)The reference to Requirement R1 should be corrected to P6T3 instead of P6T2 More important, the levels of non-compliance have been translated/mapped incorrectly from the P6T2(overall emergency restoration plan template) instead of P6T3 (loss of primary controlling facility). The levels of non-compliance should be corrected by mapping/translating the levels from P6T3 not P6T2.	Corrected.	NYPA	Ralph Rufrano
28	The term RC needs to be inserted into section of Applicability.	Corrected.	NYPA	Ralph Rufrano
29	The "Reliability Authorities" and "Reliability Authority" should be replaced with "Reliability Coordinators" and "Reliability Coordinator" in Standard 029 and 030.	RA removed.	FMPA	Robert C. Williams
29	Standard 029. We suggest removing RA and replacing with RC in requirements R1, R2, R3, R4 and R5. The telecommunication requirements should also apply to RC's.	RA removed.	FRCC	Linda Campbell
29	R1 excludes the transmission owner. "Other RA, TO and BA" should read "affected RC....".	Added RC. TO is not addressed in current policy.	IMO	Peter Henderson
29	The requirement R4 needs to be applied to the transmission Owner as well.	TO is not addressed in current policy.	IMO	Peter Henderson
29	R1 excludes the transmission owner. "Other RA, TO and BA" should read "affected RC....". In R4 -the requirement needs to be expanded to the transmission owner as well.	TO is not addressed in current policy.	NPCC CP172	Guy Zito

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Std	Comment	Response	Organization	Contact
29	R1 excludes the transmission owner. "Other RA, TO and BA" should read "affected RC....". In R4 -the requirement needs to be expanded to the transmission owner as well.	TO is not addressed in current policy.	NYPA	Chris de Graffenried
29	R1 excludes the transmission owner. "Other RA, TO and BA" should read "affected RC....". In R4 -the requirement needs to be expanded to the transmission owner as well.	TO is not addressed in current policy.	NYPA	Ralph Rufrano
29	Regarding Standard 29-Policy 7 -NPCC's participating members recommend changing R1 to; Each Reliability Authority, Transmission Operator, Balancing Authority, Transmission Owner, Generator Owner, Generator Operator and Load Serving Entity shall provide adequate and reliable telecommunications facilities internally and with others for the exchange of Interconnection and operating information necessary to maintain reliability. Where applicable, these facilities shall be redundant and diversely routed. -and changing R2 – R5 from "Each Reliability Authority, Transmission Operator, and Balancing Authority shall" To "Each Reliability Authority, Transmission Operator, Balancing Authority, Transmission Owner, Generator Owner, Generator Operator and Load Serving Entity shall" -Remove R6 and attachment 029-1 should be removed. Those procedures apply to NERCnet users, which is a small subset of community that R1 – R5 apply to. Also, these procedures are the steps for obtaining and using NERCnet. Those procedures should not be part of a Reliability Standard.	Version 1 recommendations.	NYPA	Ralph Rufrano
29	In the 4th bullet on page 029-3 of Attachment 029-1, RAIS should be RCIS.	Corrected.	SPP ORWG	Scott Moore
30	Levels 3 and 4 of Non-Compliance still refer to "Operating Authority"	Corrected.	AltaLink	Bob Lowe
30	Paragraph b) - Reference is made to the The NERC Operating Policies. Instead of referencing the NERC Operating Policies, perhaps the Standard should be	Corrected.	ECAR	Bill Squibb

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Std	Comment	Response	Organization	Contact
	referenced here.			
30	In 030 M1 add " have the " between the words "personnel" and "responsibility". Also in 030 M1 d) change "are" to "can be" or "shall be".	Corrected.	FMPA	Robert C. Williams
30	Effective Date is too soon. The Applicability section references the new NERC Model (Reliability Authorities, Transmission Operators, and Balancing Authorities), which is not even in effect, yet. How can we be expected to be in compliance (i.e. change Job Descriptions to match the new NERC model) when that Model is not even in effect.	Changed to April 1, 2005. These functions exist today, drafting team is updating reliability rules.	ECAR	Bill Squibb
30	In the Compliance Monitoring Process... if the Reset Period is One Calendar Year, then why is the Data Retention Permanent. In addition, what kind of data is considered for Data Retention. Surely a 10-year old Job Description that has been updated several times does not need to be retained permanently.	Current policy - review in Version 1.	ECAR	Bill Squibb
30	In the Levels of Non Compliance section, Levels 3 and 4... What is the Operating Authority. Earlier in this Standard, references are made, specifically, to the Reliability Authority, the Transmission Operator, and the Balancing Authority. No mention is made of Operating Authority, until here.	Corrected by removing OA.	ECAR	Bill Squibb
30	In the Levels of Non Compliance section, Level 4... Reference is made to Interview Verification Items 1 and 2. Although these appear in the original Compliance Template P8T1, they are not referenced anywhere in this Standard. Thus, this Standard should only address the 4 items mentioned in M1 of this Standard.	Corrected.	ECAR	Bill Squibb
30	Standard 030. In M1, item d should be reworded to... Written operating procedures shall state that during normal and emergency conditions....This is to include number 4 that is on the compliance template P8T1 that was left out. Also, are performed should be changed to shall be performed in the last	OA replaced. Made correction to add normal operations.	FRCC	Linda Campbell

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Std	Comment	Response	Organization	Contact
	sentence. In the self-certification paragraph, it should refer to items 1-4 in the measure, not requirements. Level 3 and level 4 of non-compliance, change operating authority RC, TOP and BA.			
30	Standard 030. Remove RA and replace with RC throughout the standard. In M1, insert the words..have the..between personnel and responsibility in the second line. In M1, item b should be reworded to...The written current job description shall state operating personnel..... In M1, item c should be reworded to...The written job description shall be readily	RA removed. Missing words corrected.	FRCC	Linda Campbell
30	Levels of Non Compliance: Level 4 "The Operating Authority has no written documentation, or has written documentation that includes none of..."	OA replaced.	Grant PUD	Bill Dearing
30	Missing the word "which" in b and d. Insert it before "states."	Corrected.	Grant PUD	Bill Dearing
30	Purpose: (recommended change) Establish the responsibility, and authority to implement real-time actions to ensure stable and reliable operation of the Bulk Electric System. This prevents R1 from repeating the purpose.	Changed purpose.	Grant PUD	Bill Dearing
30	Although the non-compliance regarding the interview verification items 1 and 2 have now been included in this draft (mapped from P8T1) yet the interview verification items 1 and 2 have not been mentioned/mapped (from P8T1) in this standard.	Corrected.	IMO	Peter Henderson
30	Although the non-compliance regarding the interview verification items 1 and 2 have now been included in this draft (mapped from P8T1) yet the interview verification items 1 and 2 have not been mentioned/mapped (from P8T1) in this standard.	Corrected.	NPCC CP180	Guy Zito
30	Although the non-compliance regarding the interview verification items 1 and 2 have now been included in this draft (mapped from P8T1) yet the interview verification items 1 and 2 have not been mentioned/mapped (from P8T1) in this	Corrected.	NYPA	Chris de Graffenried

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Std	Comment	Response	Organization	Contact
	standard.			
30	Although the non-compliance regarding the interview verification items 1 and 2 have now been included in this draft (mapped from P8T1) yet the interview verification items 1 and 2 have not been mentioned/mapped (from P8T1) in this standard.	Corrected.	NYPA	Ralph Rufrano
30	Revise as follows to correct grammar: "Evidence that the Reliability Authority, Transmission Operator, and Balancing Authority operating personnel have the responsibility and authority to implement real-time actions that ensure the stable and reliable operation of the Bulk Electric System are documented and understood. Documentation shall include:"	Corrected.	Progress Carolina	Verne Ingersoll
30	Revise as follows to correct grammar: "Evidence that the Reliability Authority, Transmission Operator, and Balancing Authority operating personnel have the responsibility and authority to implement real-time actions that ensure the stable and reliable operation of the Bulk Electric System are documented and understood. Documentation shall include:"	Corrected.	Progress Florida	Eric Grant
30	Measures state items that MUST be done. That is the purpose of the Requirement. If it must be done, then it is a REQUIREMENT. It isn't a MEASURE.	Measures can also include obligatory statements.	SRP	Gary Nolan
31	Compliance Monitoring Process still refers to "Operating Authority"	Corrected.	AltaLink	Bob Lowe
31	In the Title section, P8T3 should be added as a source of requirements for the Standard. Reliability Coordinator should be added to the Applicability section.	Removed in final draft.	CAISO	Ed Riley
31	Applicability - Only the Reliability Authority, Balancing Authority, and Transmission Operator Functional Roles are listed in the Draft #2 Version 0 Standard, however, System Operators who perform the same reliability functions also exist at other entities.	Version 1 issue.	ECAR	Mark Klohonatz

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Std	Comment	Response	Organization	Contact
	Therefore, if it can not be shown as applicable to any operators performing specific functions, the applicability of this standard should include the Transmission Owner, Generator Owner, Generator Operator, and Load Serving Entity also.			
31	Section R1.1 lists requirements for the training plan according to the Policy 8.B Articles 1.1 through 1.4. However, Articles 1.5 Verification of Achievement; 1.6 Evaluation; and 1.6 Review were eliminated. We believe that the content of these articles are valuable and should not have been eliminated.	Evaluation and review of the training program are addressed by measure M1.	ECAR	Mark Klohonatz
31	Article R1.2 of the new standard refers to ... at least five days per year of training and drills in system emergencies. Given that formal interpretations have been communicated to clarify the implementation of this requirement as to be completed with 32 contact hours, we believe that the phrase five days should be replaced with the more specific phrase 32 hours.	This interpretation is not a part of existing operating policy or compliance template and can be addressed in Version 1.	ECAR	Mark Klohonatz
31	Levels of Non-Compliance Level 2 - This statement had the original phrase SYSTEM OPERATOR replaced with the three functional roles that were listed in the Applicability section for the Standard. However, the sentence now does not read correctly and according to our comments regarding applicability listed above, to be accurate, it should also list all of the additional entities listed above. However, the best way to repair this is to re-insert the phrase SYSTEM OPERATOR as per the original.	Corrected.	ECAR	Mark Klohonatz
31	LEVEL 3 - Levels of Non-Compliance - This statement had the original phrase SYSTEM OPERATOR replaced with the three functional roles that were listed in the Applicability section for the Standard. However, the sentence now does not read correctly and according to our comments regarding applicability listed above, to be accurate, it should also list all of the additional entities	Corrected.	ECAR	Mark Klohonatz

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Std	Comment	Response	Organization	Contact
	listed above. However, the best way to repair this is to re-insert the phrase SYSTEM OPERATOR as per the original.			
31	Attachment 031-1 This attachment is, for the most part, a repeat of the existing APPENDIX 8B1 except for several minor omissions but one significant omission. The Section Y Policy 8: Operator Personnel and Training from the original APPENDIX 8B1 was entirely omitted from the 031 Standard and it should not have been. Re-insert this section into the current standard.	Removed entire attachment, as recommended by industry comments.	ECAR	Mark Klohonatz
31	Attachment 031-1 has: The word control area 41 times. Should be changed to Balancing Authority and/or Transmission Operator as appropriate. Terms used in the Glossary of Terms like dynamic schedules that are not shown as defined terms like Dynamic Schedules. Need to go through the attachment to correct.	Removed entire attachment, as recommended by industry comments.	FMPA	Robert C. Williams
31	The "Reliability Authority" should be replaced with "Reliability Coordinator". In Self-Certification of Compliance Monitoring Process change "requirement 1 and 2" to "R1" because there is only one requirement of Standard 31. In Level 2 of Levels of Non Compliance change "Requirement 1" to "R1.1". Also in Level 3 change "Criterion 2 of Requirement 1" to "R1.2".	RA removed. Corrections made.	FMPA	Robert C. Williams
31	Standard 031. In the Levels of Non Compliance, for Level 2, it should meet all five criteria under R1.1, not requirement 1.	Corrections made.	FRCC	Linda Campbell
31	Standard 031. Remove RA and replace with RC throughout. R1.1d uses the word trainers, we would recommend changing to training staff. In the Compliance Monitoring section, under self certification it refers to requirements 1 and 2. There is not a requirement 2. We believe that R1 and R1.1 was intended, but the drafting team should check and clarify.	RA removed. Corrections made.	FRCC	Linda Campbell

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Std	Comment	Response	Organization	Contact
31	Attachment: We do not believe that this attachment is necessary. With that said, through out the whole attachment there are many references to NERC Policies, and to Control Areas. The problem with this attachment is that, even though these are suggested topics, the attachment is in such detail that it could be interpreted that training must follow this format. If it is decided to keep this attachment, considerable editing must be completed to have this conform to Functional Model language.	Removed attachment.	Grant PUD	Bill Dearing
31	Through out this standard, where functions are listed, add Reliability Coordinator. The are held accountable to these training standards as well.	RC training requirements are in standard 36, as defined in existing policy.	Grant PUD	Bill Dearing
31	R1.1d. Recommend removing requirement that Trainers must be identified in training program.	Edited	Idaho Power	Kent McCarthy
31	Under "Levels of Non-Compliance Lv 3", "... not completed Criterion b) of Requirement 1-1." shall be read instead of "... not completed Criterion 2 of Requirement 1." To be consistent with the standard.	Edited	IMO	Peter Henderson
31	Delete Item 'e' or make it more definitive - "...program to consider..." Consider does not connote mandatory.	Removed.	MAAC	Al DiCaprio
31	(Levels of non-compliance) "... not completed Criterion b) of Requirement 1-1." shall be read instead of "... not completed Criterion 2 of Requirement 1." To be consistent with the standard.	Edited	NPCC CP188	Guy Zito
31	(Levels of non-compliance) "... not completed Criterion b) of Requirement 1-1." shall be read instead of "... not completed Criterion 2 of Requirement 1." To be consistent with the standard.	Edited	NYPA	Chris de Graffenried
31	(Levels of non-compliance) "... not completed Criterion b) of Requirement 1-1." shall be read instead of "... not completed Criterion 2 of Requirement 1." To be consistent with the standard.	Edited	NYPA	Ralph Rufrano
31	APPLICABILITY – the Reliability Coordinator is not listed. The RC must be part of the Functional Model, as Standard 36 properly recognizes by referring to the RC. Standard 31 should	RC training requirements are in standard 36, as defined in existing policy.	PacifiCorp	Robert Williams

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Std	Comment	Response	Organization	Contact
	include the RCs under “Applicability” otherwise there is no requirement for RCs to have a formal training program. Standard 36 simply refers to RCs being “adequately trained.”			
31	R1 indicates the Standard applies to the RA, TO and BA that are involved EITHER with a) or b) which is consistent with the draft of Standard 32 dealing with operator certification requirements. While OTS does not support the language used in Standard 32 for certification, we support the concept that a training program should be required of all entities with system operators that perform either a) or b).	Drafting team interprets the training requirement to be inclusive.	PacifiCorp	Robert Williams
31	R1.2 modifies the Recommendation 6 approved by the NERC Board of Trustees on February 10, 2004. Greater clarity of the recommendation has been needed since it was approved and Version 0 should be the vehicle to accomplish this. It is noted the Recommendation 6 sentence, “This system emergency training is in addition to other training requirements” has been omitted, and I support this change.	The drafting team believes this additional language is unnecessary.	PacifiCorp	Robert Williams
31	The Reset Period of this Standard is “One-calendar year.” R1.2 should be modified from “five days per year” to “five days per calendar year” to be more specific.	Version 1.	PacifiCorp	Robert Williams
31	Level 3 of the Levels of Non Compliance is missing key words. The proper sentence structure should be something like - all of A reliability authority's, transmission operator's, OR balancing authority's OPERATING PERSONNEL have not completed criterion 2... Without this correction, the Level is only reached if every single RA, TO, and BA in NERC is deficient in this manner.	Edited	SRP	Gary Nolan
31	The requirement for one week of Emergency Training is already addressed in Policy 6B. Inclusion in Policy 8 is redundant.	Drafting team wanted to keep this requirement here with the training requirements.	SRP	Gary Nolan
31	Attachment 031-1 B. Concepts 6). 10 minute should be changed to the Disturbance Recovery Period of 15	Removed attachment.	WE Energies	Howard Rulf

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	minutes.			
31	APPLICABILITY – the Reliability Coordinator is not listed. The RC must be part of the Functional Model, as Standard 36 properly recognizes by referring to the RC. Standard 31 should include the RCs under “Applicability” otherwise there is no requirement for RCs to have a formal training program. Standard 36 simply refers to RCs being “adequately trained.”		WECC OTS	Hank LuBean
31	R1 indicates the Standard applies to the RA, TO and BA that are involved EITHER with a) or b) which is consistent with the draft of Standard 32 dealing with operator certification requirements. While OTS does not support the language used in Standard 32 for certification, we support the concept that a training program should be required of all entities with system operators that perform either a) or b).		WECC OTS	Hank LuBean
31	R1.2 modifies the Recommendation 6 approved by the NERC Board of Trustees on February 10, 2004. Greater clarity of the recommendation has been needed since it was approved and Version 0 should be the vehicle to accomplish this. It is noted the Recommendation 6 sentence, “This system emergency training is in addition to other training requirements” has been omitted, and OTS supports this change.		WECC OTS	Hank LuBean
31	The Reset Period of this Standard is “One-calendar year.” The OTS recommends R1.2 be modified from “five days per year” to “five days per calendar year” to be more specific.	Version 1 issue.	WECC OTS	Hank LuBean
31	Add RC to the "Applicability" list, R1 and M1	RC training requirements are in standard 36, as defined in existing policy.	WECC RCS	Lisa Grow
31.1	Attachment 031-1 is a very comprehensive list of fundamental training topics. Unfortunately, these topics are more appropriate for new Operators and do not address the training needs of seasoned Operators. With a NERC Continuing Education Program	Attachment removed.	SRP	Gary Nolan

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	on our doorstep, it is a must that this attachment should also include advanced topics that are appropriate for Continuing Education.			
32	Reliability Coordinator should be added to the Applicability section. Reliability Coordinator should be added to R1 as a responsible party. Reliability Coordinator should be added to M1 as a responsible party.	Added RC.	CAISO	Ed Riley
32	Delete the words (either one or) from second line or R1, as the original Policy 8C 1 requires both of the criteria to be met to have the NERC certified operators. In fact there is a word and in bold after sub criteria a) in the policy. Therefore, the proposed language in the standard expands the requirement significantly from the current NERC Policy 8.	Compliance template language was adopted by the drafting team.	Entergy	Narinder Saini
32	The "Reliability Authorities" and "Reliability Authority" should be changed to "Reliability Coordinators" and "Reliability Coordinator" in Standard 032. Remove the words "either one or" from R1 to be consistent with existing Policy. In the Compliance Monitoring Process the term "Operating Authority" should be changed to "Reliability Coordinator, Transmission Operator or Balancing Authority".	RA deleted and RC added. Drafting team has used the language in the compliance template, which is more inclusive.	FMPA	Robert C. Williams
32	Standard 032. RA should be changed to RC throughout the standard. In R1 it states that positions that meet one or both of the criteria have to be certified. That is NOT current policy. Both the compliance template P8T2 and Policy 8C use the word and, which means both. The drafting team has made a change here that should not be made. In the Periodic Review paragraph, the term Operating Authority should be changed to RC, TOP and BA.	RA deleted and RC added. Drafting team has used the language in the compliance template, which is more inclusive.	FRCC	Linda Campbell
32	Add Reliability Coordinator	RC added.	Grant PUD	Bill Dearing
32	Add Reliability Coordinator	RC added.	Grant PUD	Bill Dearing
32	Applicability: Add Reliability Coordinator	RC added.	Grant PUD	Bill Dearing

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Std	Comment	Response	Organization	Contact
32	Levels of Non Compliance: Add Reliability Coordinator	RC added.	Grant PUD	Bill Dearing
32	<p>After reviewing the language in the Draft 2 of version 0 standard 032, it was noticed that the wording concerning who should be certified has changed from what was in the Policy 8 version. Specifically the language in the approved Policy 8 is as follows: Positions requiring NERC-Certified SYSTEM OPERATORS. An OPERATING AUTHORITY that maintains a control center(s) for the real-time operation of the interconnected BULK ELECTRIC SYSTEM, shall staff operating positions that meet both of the following criteria with NERC-Certified SYSTEM OPERATORS in accordance with the schedule in Standard 2: Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected BULK ELECTRIC SYSTEM, and Positions that are directly responsible for complying with NERC Operating Policies. The P8T2 compliance template wording is as follows: An Operating Authority that maintains a control center(s) for the real-time operation of the interconnected Bulk Electric System shall staff operating positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System, and positions that are directly responsible for complying with NERC Operating Policies, with NERC-Certified System Operators. The language in draft 1 of version 0 contained the following: shall staff all operating positions that meet either of the following..... Now the language in the draft 2 of version 0 standards contains the language change of shall staff all operating positions that meet either one or both of the following.... Our concern is that with the proposed language change the intent of the existing Policy 8 has been changed.</p>	<p>Language in the compliance template was more stringent and has been adopted by the drafting team.</p>	Personnel Sc	Earl Cass

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Std	Comment	Response	Organization	Contact
	<p>Now for the sticky part. The PS believes that with the present language in the draft 2 version 0 standards the number of individuals that will need to be certified will significantly change to a larger number. We are not opposed to this language change and in fact we support it, but, it is a departure from what the intent of the present policy 8 was. It would appear that the language in the draft 2 version 0 standard is following the language in the P8T2 template rather than the language in the approved Policy 8.</p>			
32	<p>COMPLIANCE MONITORING PROCESS - It isn't clear what is meant by "previous calendar year staffing plan." A "staffing plan" sounds like a plan for staffing – if so, what does that have to do with filling operating positions with certified operators? A simple determination of which positions require certified operators should be sufficient. Need to modify to be clear.</p>	Version 1 clarification required.	WECC OTS	Hank LuBean
32	<p>M1.a indicates that "Trainees may perform critical tasks only under the direct, continuous supervision and observation . . ." "What constitutes a "critical task?" What duties performed in a typical control center are not "critical?" Inclusion of "critical tasks" is most likely a reference to the Critical Task List that has been established to guide operators in determining which of the four certification credentials (BIO, TO, BIT, RO) they are required to attain. (cont)</p>	Version 1 clarification required.	WECC OTS	Hank LuBean
32	<p>Policy 8.C (Certification) reads "shall staff operating positions that meet both of the following criteria with NERC-Certified System Operators." The language in R1 is "that meet either one or both of the following criteria." This has the potential to significantly increase the number of system operators required to be NERC-certified, and is not in the spirit of the Version 0 Standard development of reformatting existing</p>	Language in the compliance template was more stringent and has been adopted by the drafting team.	WECC OTS	Hank LuBean

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Std	Comment	Response	Organization	Contact
	Policies into Standards while making few if any changes in meaning (cont)			
32	The OTS suggests the reference to “critical tasks” be removed to prevent possible interpretation that the uncertified operator can perform routine tasks but not “critical” tasks. Or, change it to reference the Critical Task List of the credential and include it in the Standard.	Version 1 clarification required.	WECC OTS	Hank LuBean
32	This type of change should be part of the Version 1 development, allowing the industry full opportunity to understand and comment. It should be noted this change was part of Draft 1 and we do not see where the Standard Drafting Team responded to comments submitted by several entities with this same concern.	Language in the compliance template was more stringent and has been adopted by the drafting team.	WECC OTS	Hank LuBean
32	Add RC to the "Applicability" list, R1 and M1	RC added.	WECC RCS	Lisa Grow
33	The Reliability Authority should be removed from Standard 033.	RA deleted.	FMPPA	Robert C. Williams
33	Standard 033. For R7, we can not find the words in existing documents. Policy 9A1 is referenced but these words do not agree with that section or compliance templateP9T3. R8 should be rewritten to place the obligation on the BA's and TOP's to comply with the RC directives. The BA's and TOP's should be required to have the appropriate agreements with the other operating entities to carry out the directives of the RC. RA should be removed from this standard.	RA removed. The drafting team believes the intent of policy is that all of these functions can be directed by the Reliability Coordinator. The introduction to Policy 9 provides a broad definition of operating authorities, including entities controlling generation and load.	FRCC	Linda Campbell
33	Standard 033. The first paragraph of the compliance monitoring process refers to operating entities. Operating entities in the first sentence should be changed to BA and TOP. Level 3 non-compliance should be reworded for clarity. We suggest the following...RC does not have the documentation demonstrating authority to direct all BA's and TOP's in it RC area to take necessary actions to	Corrected	FRCC	Linda Campbell

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Std	Comment	Response	Organization	Contact
	return the system to a reliable state. The reference to SOL and IROl is too specific and not in P9T3.			
33	Reference should be Policy 9 B1 instead of Policy 9 A1.	Corrected.	IMO	Peter Henderson
33	Reference should be Policy 9 B3 instead of Policy 9 A3.	Corrected.	IMO	Peter Henderson
33	Reference should be Policy 9 H1 instead of Policy 9 A1.	Corrected.	IMO	Peter Henderson
33	Reference should be Policy 9B 2 instead of Policy 9A 2	Corrected.	IMO	Peter Henderson
33	The term "reliability entities" needs to be defined to remove any ambiguity.	Corrected.	IMO	Peter Henderson
33	Purpose - the stated purpose of this standard is to give the RC the authority to shed load. However, in standard 25 and 26 the RCs are not included. For example Standard 25 does not require RC to be certified and Standard 26 requires Load Shedding PLasns but only by the RAs.	Policy E1.4.2 and E1.4.4 are at least two instances of current policy stating RC has authority to direct load shedding. RC certification is required and that has been corrected in Stanard 31.	MAAC	Al DiCaprio
33	The term "reliability entities" needs to be defined to remove ambiguity.	Corrected.	NPCC CP196	Guy Zito
33	The term "reliability entities" needs to be defined to remove ambiguity.	Corrected.	NYPA	Chris de Graffenried
33	The term "reliability entities" needs to be defined to remove ambiguity.	Corrected.	NYPA	Ralph Rufrano
33	Delete second "that" in the last line of the Purpose.	Corrected.	SPP ORWG	Scott Moore
33	In the last sentence of the Purpose, the word THAT is repeated.	Corrected.	SRP	Gary Nolan
33	The term Reliability Coordinators should be SINGULAR in this sentence for proper grammar.		SRP	Gary Nolan
34	Remove "Reliability Authorities".	RA removed.	FMPA	Robert C. Williams
34	Standard 034. Remove the reference to RA's in R2, R3 and R4.	RA removed.	FRCC	Linda Campbell
34	The last sentence should read "These communication facilities shall be staffed..." instead of "These communications shall be staffed..."	Corrected.	IMO	Peter Henderson

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Std	Comment	Response	Organization	Contact
34	The requirement is not measureable regarding "easily understood" or "Particular emphasis". Would suggest wording such as : "...provide information on alarm management and awareness," similarly with R7 - drop the word 'adequate'.	Language in existing policy - would require Version 1 clarification.	MAAC	Al DiCaprio
34	The last sentence should read "These communication facilities shall be staffed..." instead of "These communications shall be staffed..."	Corrected.	NPCC CP204	Guy Zito
34	The last sentence should read "These communication facilities shall be staffed..." instead of "These communications shall be staffed..."	Corrected.	NYPA	Chris de Graffenried
34	The last sentence should read "These communication facilities shall be staffed..." instead of "These communications shall be staffed..."	Corrected.	NYPA	Ralph Rufrano
35	Reword to "When a RELIABILITY COORDINATOR is aware of an operational concern, such as declining voltages, excessive reactive flows, or an IROL violation in a neighbouring RELIABILITY COORDINATOR, it shall contact the RELIABILITY COORDINATOR in whose RELIABILITY COORDINATOR AREA the operational concern was observed."	Corrected.	IMO	Peter Henderson
35	Reword to "When a RELIABILITY COORDINATOR is aware of an operational concern, such as declining voltages, excessive reactive flows, or an IROL violation in a neighbouring RELIABILITY COORDINATOR, it shall contact the RELIABILITY COORDINATOR in whose RELIABILITY COORDINATOR AREA the operational concern was observed."	Corrected.	NPCC CP212	Guy Zito
35	Reword to "When a RELIABILITY COORDINATOR is aware of an operational concern, such as declining voltages, excessive reactive flows, or an IROL violation in a neighbouring RELIABILITY COORDINATOR, it shall contact the RELIABILITY COORDINATOR in whose	Corrected.	NYPA	Chris de Graffenried

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Std	Comment	Response	Organization	Contact
	RELIABILITY COORDINATOR AREA the operational concern was observed.”			
35	Reword to ”When a RELIABILITY COORDINATOR is aware of an operational concern, such as declining voltages, excessive reactive flows, or an IROL violation in a neighbouring RELIABILITY COORDINATOR, it shall contact the RELIABILITY COORDINATOR in whose RELIABILITY COORDINATOR AREA the operational concern was observed.”	Corrected.	NYPA	Ralph Rufrano
36	Remove "Reliability Authorities".	RA removed.	FMPA	Robert C. Williams
36	Standard 036. Remove the reference to RA in R3.	RA removed.	FRCC	Linda Campbell
36	Remove second sentence and incorporate this language into Standard 31 R1.2		Grant PUD	Bill Dearing
36	delete "extensive" ; and in R4 delete word 'particular' , and revise 'best available information' to "updated information"	This language is adopted from the recently revised policy 9J 1.2.	MAAC	Al DiCaprio
36	Comment – Why are Measures, Compliance Monitoring, and Levels of Non-Compliance still “Not Specified?” This is Draft 2 of the Version 0 Standards and it is expected the Standards would be fully developed by now in order for the industry to comment. What are the issues causing these parts of the Standard to remain not specified?	Not in current template or policy - Version 1 enhancement.	WECC OTS	Hank LuBean
36	However, Standard 36 doesn't make the same change when it states the requirement is “in addition to other training required.” Why the difference? The OTS believes the RCs should be required to have a training program as stated in our comments on Standard 31, and does not see any reason to include the "in addition to other training requirements" for the RCs.	Not in current template or policy - Version 1 enhancement.	WECC OTS	Hank LuBean

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Std	Comment	Response	Organization	Contact
36	Standard 31 has a Reset Period of “One-calendar year” for this requirement and OTS suggested a slight change in the language. The Compliance Monitoring Process for Standard 36 indicates “Not Specified.” The OTS recommends the Reset Period be defined and include the same modification as in Standard 31, that “five days per year” be changed to “five days per calendar year.”	Not in current template or policy - Version 1 enhancement.	WECC OTS	Hank LuBean
36	Standard 31 modifies the Recommendation 6 approved by the NERC Board of Trustees on February 10, 2004. Greater clarity of the recommendation has been needed since it was approved and Version 0 should be the vehicle to accomplish this. Standard 31 omits the Recommendation 6 sentence, “This system emergency training is in addition to other training requirements” and OTS supports this change. (cont)	The drafting team believes this additional language is unnecessary.	WECC OTS	Hank LuBean
36	The Reliability Coordinator must be part of the Functional Model, as Standard 36 properly recognizes. RCs should be included in Standard 31, or the requirements of Standard 31 should be repeated in this Standard, otherwise there is no requirement to have a formal training program since Standard 36 simply refers to RCs being “adequately trained.” This is major omission with respect to the RCs.	Agreed - changes made.	WECC OTS	Hank LuBean
37	In R4, R7 and R8 Remove "Reliability Authorities".	RA removed.	FMPA	Robert C. Williams
37	Standard 037. In R4 and R8, remove the reference to RA. Also reword to place the responsibility on the RC to obtain the information required for the system studies. See our comment to question 11. In R5 we think the results of system studies should only be provided to BA's, TOP's and other RC's. Gen Operators may be merchant and providing them study results may violate confidentiality agreements. In R7, remove RA's and the reference should be to RCIS, not RAIS.	RA removed. The current language in the draft standard is closer to the existing policy and the recommended change modifies the meaning. In R5 removed Generator Operators.	FRCC	Linda Campbell
37	Add Reliability Authorities	RA removed.	Grant PUD	Bill Dearing

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Std	Comment	Response	Organization	Contact
37	Add Reliability Authorities	RA removed.	Grant PUD	Bill Dearing
37	Applicability: Add Reliability Authority	RA removed.	Grant PUD	Bill Dearing
37	Change Reliability Coordinator Information System (RAIS) to Reliability Authority Information System	RA removed.	Grant PUD	Bill Dearing
37	Reference should be P9 D2 instead of P9 D4.	Corrected.	IMO	Peter Henderson
37	Reference should be Policy 9 D1.2 instead of Policy 9 J1.2.	Corrected.	IMO	Peter Henderson
37	Reference should be Policy 9 D3 instead of Policy 9 T1.2.	Refers to template P9T1, not policy 9T.	IMO	Peter Henderson
37	We are of the opinion that there should not be both RA and an RC. Accordingly, one terminology should be used in this standard. See comments given in Q1. The information system (RCIS) related terminology should be used accordingly.	RA removed.	IMO	Peter Henderson
37	Change "pay particular attention to " to "monitor"	Current policy - review in Version 1.	MAAC	Al DiCaprio
37	The information system (RCIS) related terminology should be used.	Corrected.	NPCC CP220	Guy Zito
37	The information system (RCIS) related terminology should be used.	Corrected.	NYPA	Chris de Graffenried
37	The information system (RCIS) related terminology should be used.	Corrected.	NYPA	Ralph Rufrano
37	The acronym RAIS should be RCIS.	Corrected.	SPP ORWG	Scott Moore
38	Reliability Authority should be added to the Applicability section. Load Serving Entities should be added to Requirement 4 at the very end after Balancing Authority.	RA removed. LSE added.	CAISO	Ed Riley
38	The "Reliability Authorities" and "Reliability Authority" should be removed from Standard 038.	RA removed.	FMPA	Robert C. Williams
38	Standard 038. Remove RA from R3, R6, R8, R9, R13, R15, and R17. In draft 2 the old R17 was stricken (issuing directives in a clear, concise.....). This needs to be put back in. The notes say it is in standard 029 but we do not find it anywhere else. The numbering of the last three requirements needs to be corrected.	RA removed. Communications language was added to communications standard and RC added to the communication standard as a responsible entity.	FRCC	Linda Campbell
38	Applicability: Add Reliability Authorities	RA removed.	Grant PUD	Bill Dearing
38	Change Balancing Authority to Reliability Authorities	RA removed.	Grant PUD	Bill Dearing

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Std	Comment	Response	Organization	Contact
38	Reference should be Policy 9 E1.6 instead of Policy 9 C1.6.	Corrected.	IMO	Peter Henderson
38	The end of the first sentence should read "...Reliability Coordinators shall be aware of the impact of the operation OF THAT SPECIAL PROTECTION SYSTEM on inter-Area flows."	Corrected.	IMO	Peter Henderson
38	The last sentence should read "The Reliability Coordinator shall disseminate such information within its Reliability Coordinator Area, AS NECESSARY.	Corrected.	IMO	Peter Henderson
38	This requirement lacks clarity. It needs to be clarified that whether the word "limits" at the end of the last sentence refer to SOL or IROL or both?	Corrected.	IMO	Peter Henderson
38	The last sentence should read "The Reliability Coordinator shall disseminate such information within its Reliability Coordinator Area, AS NECESSARY.-In R12-The end of the first sentence should read "...Reliability Coordinators shall be aware of the impact of the operation OF THAT SPECIAL PROTECTION SYSTEM on inter-Area flows."-In R17- This requirement lacks clarity. It needs to be clarified that whether the word "limits" at the end of the last sentence refer to SOL or IROL or both?	Corrected.	NPCC CP228	Guy Zito
38	The last sentence should read "The Reliability Coordinator shall disseminate such information within its Reliability Coordinator Area, AS NECESSARY.-In R12-The end of the first sentence should read "...Reliability Coordinators shall be aware of the impact of the operation OF THAT SPECIAL PROTECTION SYSTEM on inter-Area flows."-In R17- This requirement lacks clarity. It needs to be clarified that whether the word "limits" at the end of the last sentence refer to SOL or IROL or both?	Corrected.	NYPA	Chris de Graffenried
38	The last sentence should read "The Reliability Coordinator shall disseminate such information within its Reliability Coordinator Area, AS NECESSARY.-In R12-The end of the first sentence should read "...Reliability Coordinators shall be aware of the impact of the operation OF THAT SPECIAL PROTECTION	Corrected.	NYPA	Ralph Rufrano

Std	Comment	Response	Organization	Contact
	SYSTEM on inter-Area flows."-In R17- This requirement lacks clarity. It needs to be clarified that whether the word "limits" at the end of the last sentence refer to SOL or IROL or both?			
39	The "Reliability Authorities" should be removed from Standard 039. Attachment 039-1: In 1.3 and 2.8.2 change "bulk system" to "Bulk Electric System". In Figure 1 of 6.2 the current hour and next hour are missing. In Figure 2 of 6.2 "Sink Control Area" should be changed to "Sink Balancing Authority". In 7.9 "Control Area" should be changed to "Balancing Authority".	RA removed. BES corrected. Figure corrected. CA changed to BA.	FMPPA	Robert C. Williams
39	Standard 039. Remove RA from the purpose. R2 should be reworded for clarity, we suggest...The RC experiencing a potential or actual SOL or IROL violation on the transmission system within its RC area shall, at its discretion.... R2.1, R2.2 and R2.3 are really Regional Differences. We would suggest moving these to that section and rewording as needed. The reset period statement is redundant to the compliance reset period statement.	RA removed. R2 revised.	FRCC	Linda Campbell
39	Change Reliability Coordinator Information System to Reliability Authority Information System	RA removed.	Grant PUD	Bill Dearing
39	Figure 2, upper left corner. Change SC to RC.	Corrected SC to RC and CA to BA in several places in Figure 2.	Idaho Power	Kent McCarthy
39	For the purposes of clarity the R2 should read as follows: "A Reliability Coordinator experiencing a potential or actual SOL or IROL violation within its Reliability Coordinator Area shall, at its discretion, select from either a "local" (Regional, Interregional or subregional) or an Interconnection-wide transmission loading relief procedure."	R2 revised.	IMO	Peter Henderson
39	The terminology "interchange scheduling standards" (referred to at the end of the sentence) needs to be clarified to reflect and reference to specific standard.	Added reference to INT standards.	IMO	Peter Henderson

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Std	Comment	Response	Organization	Contact
39	For the purposes of clarity the R2 should read as follows: "A Reliability Coordinator experiencing a potential or actual SOL or IROL violation within its Reliability Coordinator Area shall, at its discretion, select from either a "local" (Regional, Interregional or subregional) or an Interconnection-wide transmission loading relief procedure."-In R6- "interchange scheduling standards" (referred to at the end of the sentence) needs to be clarified to reflect and reference to specific standard.	R2 revised.	NPCC CP236	Guy Zito
39	For the purposes of clarity the R2 should read as follows: "A Reliability Coordinator experiencing a potential or actual SOL or IROL violation within its Reliability Coordinator Area shall, at its discretion, select from either a "local" (Regional, Interregional or subregional) or an Interconnection-wide transmission loading relief procedure."-In R6- "interchange scheduling standards" (referred to at the end of the sentence) needs to be clarified to reflect and reference to specific standard.	R2 revised.	NYPA	Chris de Graffenried
39	For the purposes of clarity the R2 should read as follows: "A Reliability Coordinator experiencing a potential or actual SOL or IROL violation within its Reliability Coordinator Area shall, at its discretion, select from either a "local" (Regional, Interregional or subregional) or an Interconnection-wide transmission loading relief procedure."-In R6- "interchange scheduling standards" (referred to at the end of the sentence) needs to be clarified to reflect and reference to specific standard.	R2 revised.	NYPA	Ralph Rufrano
39	Appendix C of Attachment 039-1 is no longer used. See inconsistency mentioned above.	Version 1 change.	SPP ORWG	Scott Moore
39	The usage of the TLR Log as contained in Section 1.8 of Attachment 039-1 is not consistent with TLR Log definition in the Glossary. Although Section 1.8 is consistent with current Policy, this log is no longer used in actual practice. Actual practice is more in line with that captured	Version 1 change.	SPP ORWG	Scott Moore

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Std	Comment	Response	Organization	Contact
	in the definition in the Glossary.			
40	The "Reliability Authority" in R1, R3 and R4 should be changed to "Transmission Operator and Balancing Authority". The Reliability Authority" should be removed from R5.	RA removed.	FMPA	Robert C. Williams
40	Standard 040. In R1, R3, and R4, RA should be replaced with TOP and BA. RA should be removed from R5.	RA removed.	FRCC	Linda Campbell