

Consideration of Comments — 3rd Draft of Relay Loadability Standard

The Relay Loadability standard drafting team thanks all commenters who submitted comments on Draft 3 of the Relay Loadability standard. This standard was posted for a 30-day public comment period from March 19 through April 17, 2007. The drafting team asked stakeholders to provide feedback on the standard through a special standard Comment Form. There were 14 sets of comments, including comments from 49 different people from 40 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

The stakeholder comments submitted in response to the third draft of the Relay Loadability Standard did not indicate a need to make further modifications to the standard. Based on the drafting team's review of the comments received, the drafting team is recommending that this standard move to the balloting phase.

Note that following the closing of this comment period, the drafting team met and discussed observations of FERC staff, and made the following changes to the standard either in support of the FERC observations or to improve the clarity of the standard or to better support the compliance program:

- Revised the purpose statement to include stronger emphasis on the reliability objective behind this standard.
- Revised the proposed effective dates to align with the compliance program's request that all requirements become effective on the first day of a calendar quarter and to reflect that in some jurisdictions, the approval of a standard is tied to BOT adoption and not a separate regulatory approval.
- Inserted the phrase "load-responsive" into A4.1, A4.2 and A4.3 for clarification.
- Modified the second footnote for clarification.
- Added a third footnote to R1.11 to reference the IEEE standard that supports the requirement.
- Subdivided and relocated the text formerly in R4. to Section 5 Effective Dates and R1.
- Replaced the term Regional Entity with Compliance Enforcement Authority in Section D.
- Modified the Violation Severity Levels to include a reference to the associated requirement.

In this "Consideration of Comments" document stakeholder comments have been organized so that it is easier to see the responses associated with each question. All comments received on the standards can be viewed in their original format at:

<http://www.nerc.com/~filez/standards/Relay-Loadability.html>

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Development Procedures: <http://www.nerc.com/standards/newstandardsprocess.html>.

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

	Commenter	Organization	Industry Segment										
			1	2	3	4	5	6	7	8	9	10	
1.	Anita Lee (G4)	AESO		✓									
2.	Ken Goldsmith (G5)	ALT											✓
3.	Dave Rudolph (G5)	BEPC											✓
4.	Brent Kingsford (G4)	CAISO		✓									
5.	Ed Thompson (G2)	ConEd	✓									✓	
6.	Karl Kinsley (G1)	Delmarva Power and Light	✓										
7.	Ed Davis	Entergy Services, Inc.	✓										
8.	Steve Myers (G4)	ERCOT		✓									
9.	David Folk	FirstEnergy	✓		✓		✓	✓					
10.	Dave Powell	FirstEnergy	✓										
11.	Joe Knight (G5)	GRE											✓
12.	Dick Pursley (G5)	GRE											✓
13.	David Kiguel (G2)	Hydro One Networks	✓										
14.	Roger Champagne (I) (G1)	Hydro-Québec TransÉnergie (HQT)	✓										
15.	Ron Falsetti (I) (G2) (G4)	Independent Electricity System Operator		✓									
16.	Kathleen Goodman (I) (G2)	ISO-NE		✓									
17.	William Shemley (G2)	ISO-NE		✓									
18.	Matt Goldberg (G4)	ISO-NE		✓									
19.	Brian F. Thumm	ITC Transmission	✓										
20.	Jim Cyrulewski (G3)	JDRJC Associates									✓		
21.	Mike Gammon	Kansas City Power & Light	✓										

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Commenter		Organization	Industry Segment																				
			1	2	3	4	5	6	7	8	9	10											
22.	Eric Ruskamp (G5)	LES																				✓	
23.	Donald Nelson (G2)	MA Dept. of Tele. and Energy																					✓
24.	Robert Coish (I) (G5)	Manitoba Hydro	✓		✓			✓	✓														
25.	William Phillips (G4)	MISO		✓																			
26.	Terry Bilke (G3) (G5)	MISO		✓																			
27.	Carol Gerou (G5)	MP																					✓
28.	Mike Brytowski (G5)	MRO																					✓
29.	Randy MacDonald (G2)	NBSO		✓																			
30.	Herb Schrayshuen (G2)	NGRID	✓																				
31.	Michael Schiavone (G2)	NGRID	✓																				
32.	Michael Rinalli (G2)	NGRID	✓																				
33.	Murale Gopinathan (G2)	Northeast Utilities	✓																				
34.	Guy V. Zito	NPCC																					✓
35.	Al Boesch (G5)	NPPD																					✓
36.	Greg Campoli (G2)	NYISO		✓																			
37.	Mike Calimano (I) (G4)	NYISO		✓																			
38.	Ralph Rufrano	NYPA	✓																				
39.	Al Adamson (G2)	NYSRC																					✓
40.	Todd Gosnell (G5)	OPPD																					✓
41.	Richard J. Kafka (G1)	Pepco Holdings, Inc. – Affiliates	✓																				
42.	Alicia Daugherty (G4)	PJM		✓																			
43.	Alvin Depew (G1)	Potomac Electric Power Company	✓																				
44.	Evan Sage (G1)	Potomac Electric Power Company	✓																				
45.	Charles Yeung (G4)	SPP		✓																			
46.	Jim Haigh (G5)	WAPA																					✓
47.	Neal Balu (G5)	WPSR																					✓
48.	David Lemmons (G3)	Xcel Energy								✓													

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Commenter		Organization	Industry Segment												
			1	2	3	4	5	6	7	8	9	10			
49.	Pam Oreschnik (G5)	XEL													✓

I – Indicates that individual comments were submitted in addition to comments submitted as part of a group

G1 – Pepco Holdings, Inc. – Affiliates

G2 – NPCC CP9 Reliability Standards Working Group (NPCC CP9)

G3 – Midwest Standards Collaboration Group

G4 – IRC Standards Review Committee

G5 – Midwest Reliability Organization (MRO)

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- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area. 10

Consideration of Comments — 3rd Draft of Relay Loadability Standard

1. The drafting team, in response to comments, has changed the responsible entity for R3 from Reliability Coordinator to Planning Coordinator. Do you agree with this change? If not, please explain in the comment area.

Summary Consideration: Of the thirteen sets of comments received in response to this question, only one includes a "no" response. The response to that commenter is noted below.

Question #1			
Commenter	Yes	No	Comment
Kansas City P&L		<input checked="" type="checkbox"/>	The Planning Coordinator in the NERC Functional Model is responsible for the coordination of generation and transmission plans of Transmission Planners, Resource Planners and other Planning Coordinators for the purpose of system analysis and subsequent coordination of plans or recommendations for modification to plans to meet system reliability planning criteria. They are responsible to provide results of the analysis to Reliability Coordinators. Ahead of time, Reliability Coordinators coordinate reliability related matters with Transmission Operators and Generator Operators to develop operating agreements or procedures regarding reliability related matters. The Reliability Coordinator coordinates operating procedures with other Reliability Coordinators and determines IROL limits. Fundamentally, the Planning Coordinator identifies areas of reliability concern and helps to plan asset additions or changes to address those concerns. The Reliability Coordinator works with others to mitigate reliability concerns until such asset plans can be implemented and is responsible to establish SOL and IROL limits with Operators. The Reliability Coordinator is in the appropriate position to determine what facilities are critical to the operation of the region based on their responsibility to establish operating limits and operating agreements according to the NERC Functional Model.
Response:			
The Reliability Coordinator is primarily responsible for the real time and near-real-time operating horizons and R3 pertains to a planning horizon task. Therefore it seems appropriate for the Planning Coordinator to be assigned responsibility for complying with R3. These circuits may be identified by application of various operating-limit-definitions practices, such as determination of Interconnection Reliability Operating Limits (IROLs).			
Pepco Holdings, Inc.	<input checked="" type="checkbox"/>		
Hydro-Québec TransÉnergie	<input checked="" type="checkbox"/>		

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Question #1			
Commenter	Yes	No	Comment
IESO	<input checked="" type="checkbox"/>		
NPCC CP9 RSWG	<input checked="" type="checkbox"/>		
Entergy	<input checked="" type="checkbox"/>		
FirstEnergy	<input checked="" type="checkbox"/>		
IRC Standards Review Committee	<input checked="" type="checkbox"/>		
ISO New England	<input checked="" type="checkbox"/>		
ITC Transmission	<input checked="" type="checkbox"/>		
Midwest SCG	<input checked="" type="checkbox"/>		
MRO	<input checked="" type="checkbox"/>		
NYISO	<input checked="" type="checkbox"/>		

2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.

Summary Consideration: Of the 14 sets of comments, 6 showed that field testing is needed; 8 did not. There does not appear to be a consensus on this issue. The comments in response to this question have been referred to the NERC Compliance staff for their consideration in making a recommendation to the Standards Committee with respect to field testing.

Question #2			
Commenter	Yes	No	Comment
Pepeco Holdings, Inc.	<input checked="" type="checkbox"/>		While most Planning Coordinators have working relationships with Reliability Coordinators, we are willing to accept the recommendation of Compliance personnel.
Response: The drafting team acknowledges your comment. Thank you for submitting it.			
Kansas City P&L	<input checked="" type="checkbox"/>		If the Standard moves forward with the notion that the Planning Coordinator is responsible to identify critical facilities. A field test should reveal if the Planning Coordinator is the appropriate entity.
Response: The drafting team acknowledges your comment. Thank you for submitting it.			
Midwest SCG	<input checked="" type="checkbox"/>		To our knowledge, there are no entities registered as a Planning Coordinator. There is a need to differentiate the wide-area coordination that is done from the local transmission planner. The industry has not yet provided this differentiation in the standards.
Response: In Version 3 of the Functional Model, the 'Planning Authority' was re-named the 'Planning Coordinator' and the Standards Committee directed drafting teams to begin using the term, 'Planning Coordinator' in standards, rather than the term, 'Planning Authority'.			
MRO	<input checked="" type="checkbox"/>		In the SDT's Consideration of Comments from Draft 2, they indicated that the standard has already undergone extensive field testing in conjunction with NERC Recommendation 8a and the Beyond Zone 3 activities. What the SDT was not clear on was, if these activities were conducted with the RC as the responsible entity or the PC. If these activities have not been conducted with the PC as the responsible entity, the MRO recommends that additional field testing is needed. If however the PC was the responsible entity, the MRO does not believe any additional field testing is needed.
Response:			

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Question #2			
Commenter	Yes	No	Comment
The previous extensive field testing of the requirements did not consider application to the Planning Coordinator. Thank you for your input.			
Hydro-Québec TransÉnergie	<input checked="" type="checkbox"/>		
FirstEnergy	<input checked="" type="checkbox"/>		
IESO		<input checked="" type="checkbox"/>	
NPCC CP9 RSWG		<input checked="" type="checkbox"/>	
Entergy		<input checked="" type="checkbox"/>	
IRC Standards Review Committee		<input checked="" type="checkbox"/>	
ISO New England		<input checked="" type="checkbox"/>	
ITC Transmission		<input checked="" type="checkbox"/>	
Manitoba Hydro		<input checked="" type="checkbox"/>	
NYISO		<input checked="" type="checkbox"/>	

3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.

Summary Consideration: The voltage-level criterion was developed to produce a clear, specific applicability of this standard for circuits 200 kV and above, and to produce a consistent and measurable standard which can be monitored for compliance. Some entities may have circuits 200 kV and above which individually have little impact on the reliability of the bulk electric system. However, FERC, in its Order 693, showed considerable deference to the recommendations from the August 2003 blackout, and those recommendations were the basis of this standard's applicability to circuits 200 kV and above, and to "operationally-significant" lower voltage level circuits. The less-prescriptive criterion for applicability to lower-voltage-level circuits permits more flexibility in identifying these equally critical circuits. These circuits may be identified by application of various operating-limit-definitions practices, such as determination of Interconnection Reliability Operating Limits (IROLs).

All circuits, 200 kV and above, must be evaluated relative to any one of the sub-requirements of R1. Requirements R1.6, R1.7, R1.8, and R1.9 may support compliance with this Standard for such circuits that may not be individually critical to reliability of the BES.

Several commenters expressed disagreement with the assignment of violation severity levels but this disagreement was based on a misunderstanding that the violation severity levels assess 'importance' - violation severity levels are intended to measure the gap between the required and actual performance. Violation risk factors are used to assess the potential impact to reliability for the violation of a specific requirement.

Question #3			
Commenter	Yes	No	Comment
Hydro-Québec TransÉnergie		<input checked="" type="checkbox"/>	<p>We believe that this standard should only apply to the BPS as determined by an approved FERC filed BPS region specific impact based methodology. Hence, in the applicability section (4.1) and Requirements R3, the standard should have references removed that specify voltage level and should only reference the BPS. There are many instances where 200 kV and higher transmission lines do not constitute a BPS facility and on a going forward basis if further 200 kV lines are built or relay loadability requirements are adjusted, the only lines that should be considered are BPS lines determined from an impact based methodology. Presently the standard only has an implicit impact based determined BPS in the 100-200k V class and specifically applies to equipment 200kV and above.</p> <p>A suggested change to address the issue we raise is to change the applicability to 100 kV and above as determined by the Planning Coordinator or just specify that it applies to</p>

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Question #3			
Commenter	Yes	No	Comment
			equipment determined from an impact based methodology without specifying voltage.
<p>Response:</p> <p>See question #3 Summary Consideration above.</p>			
NPCC CP9 RSWG		<input checked="" type="checkbox"/>	<p>NPCC Participating members believe that this standard should only apply to the BPS as determined by an approved FERC filed BPS region specific impact based methodology. Hence the standard should have references removed that specify voltage level and should only reference the BPS. There are many instances where 200kV and higher transmission lines do not constitute a BPS facility and on a going forward basis if further 200kV lines are built or relay loadability requirements are adjusted, the only lines that should be considered are BPS lines determined from an impact based methodology. Presently the standard only has an implicit impact based determined BPS in the 100-200kV class.</p> <p>A suggested change to address the issue we raise is to change the applicability to 100kV and above as determined by the Planning Coordinator.</p>
<p>Response:</p> <p>See question #3 Summary Consideration above.</p>			
Entergy		<input checked="" type="checkbox"/>	<p>We disagree with the use of the undefined phrase - CRITICAL TO THE RELIABILITY OF THE BULK ELECTRIC SYSTEM. We understand this phrase has been used in previous versions of this draft standard and this comment is late in the development. However, in the last several months the use of the term CRITICAL has taken new and much greater significance, and increased application to a wider range of the industry (for instance cyber security), that we suggest this undefined phrase be replaced with NERC defined terms.</p> <p>NERC has developed criteria to determine what facilities are critical to the reliability of the bulk electric system. That criteria is defined in other NERC standards and results in IROLs. By definition of an IROL, if a facility is not related to an IROL then that facility is not critical to the reliability of the bulk electric system. Therefore, we suggest the undefined phrase - CRITICAL TO THE RELIABILITY OF THE BULK ELECTRIC SYSTEM - be replaced with - A FACILITY DEFINING AN IROL.</p>
<p>Response:</p>			

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Question #3			
Commenter	Yes	No	Comment
See question #3 Summary Consideration above.			
IESO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The intent of R3 and its sub-requirements is to ensure that the Planning Coordinator determines the list of critical facilities in its area and to ensure facility owners are informed of which of their facilities are critical to the reliability of the electric system in order that they design/set their relays to meet R1. Communicating that list of critical facilities is, in our view, one of the most important aspects of these requirements.</p> <p>If one accepts the above argument, the requirement to maintain the list seems secondary. Note that maintaining the list does not imply that the list has been communicated to the facility owners. However, having communicated the list to the owners while not maintaining the list would still meet the intent of this standard. We therefore propose that 3.4.2 "Does not maintain a current list of facilities critical to the reliability of the Bulk Electric System" be moved from "Severe" to the "High level".</p>
<p>Response:</p> <p>The drafting team agrees that communicating the list of critical facilities is one of the most important aspects of this standard, however the violation severity levels are not designed to measure 'importance,' they are designed to assess the degree to which an entity violated a specific requirement or sub-requirement. An entity that missed the entire intent of the requirement or sub-requirement (failure to maintain the list) has a 'severe' violation severity level.</p>			
IRC Standards Review Committee	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The intent of R3 and its sub-requirements is to ensure that the Planning Coordinator determines the list of critical facilities in its area and to ensure facility owners are informed of which of their facilities are critical to the reliability of the electric system in order that they design/set their relays to meet R1. Communicating that list of critical facilities is, in our view, one of the most important aspects of these requirements. There is no such thing as a partial communication and so it's a case of either full compliant (communication) or flat out non-compliant (no communication at all). We therefore propose that Severity level 3.3.1 be moved to the Severe level.</p> <p>If one accepts the above argument, the requirement to maintain the list seems secondary. Note that maintaining the list does not imply that the list has been communicated to the facility owners. However, having communicated the list to the owners while not maintaining the list would still meet the intent of this standard. We therefore propose that 3.4.2 "Does not maintain a current list of facilities critical to the</p>

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Question #3			
Commenter	Yes	No	Comment
			reliability of the BES” be moved from “Ssever” to the “High level”.
<p>Response:</p> <p>The drafting team agrees that communicating the list of critical facilities is one of the most important aspects of this standard, however the violation severity levels are not designed to measure ‘importance,’ they are designed to assess the degree to which an entity violated a specific requirement or sub-requirement. An entity that missed the entire intent of the requirement or sub-requirement (failure to maintain the list) has a ‘severe’ violation severity level.</p>			
ISO New England		<input checked="" type="checkbox"/>	We suggest either changing the applicability to be 100 kV and above as determined by the Planning Coordinator or BPS facilities to be consistent with the recent FERC Order.
<p>Response:</p> <p>See question #3 Summary Consideration above.</p>			
ITC Transmission		<input checked="" type="checkbox"/>	The Standard still emphasizes a distinct difference between 4-hour and 15-minute facility ratings, which suggests that each are required to be established. An explanatory note or footnote should clearly indicate that multiple facility ratings are not required to be established, and that a single rating can be used to satisfy both R1.1 and R1.2.
<p>Response:</p> <p>It is only necessary to meet one requirement of R1.1 through R1.13 for each transmission line or transformer. The intent of the Standard is not to require that 4-hour and 15-minute ratings be established. Either the rating closest to a 4-hour rating is used in R1.1 or a 15-minute rating is used on R1.2. Requirement R1.2 is applicable only when a 15-minute rating has been published and is available to the Transmission Operator.</p>			
Kansas City P&L		<input checked="" type="checkbox"/>	R2: Please review FAC-008-1, R3. Is the requirement R2 in proposed standard PRC-023-1 the same as requirement R3 in FAC-008-1? I believe the intent of FAC-008-1 is for all entities to agree to the facility rating as determined by the asset owner. Agreement must be reached or R3 cannot be satisfied.
<p>Response:</p> <p>FAC-008-1 R3 addresses overall review of a Facility Ratings Methodology, and PRC-023 (Draft) R2 addresses a group of specific ratings. The Drafting Team feels that these are not inconsistent, and that no changes are necessary.</p>			
Manitoba Hydro		<input checked="" type="checkbox"/>	MH feels that some of our comments during the last two rounds of commenting periods

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Question #3			
Commenter	Yes	No	Comment
			<p>have not been addressed. Mainly:</p> <p>1) Although the SDT repeatedly stated that protection systems are designed to remove faults but not to prevent equipment damage, and the operator action is required to protect facilities from overload conditions, MH still believes that protection system can provide the last resort protection to prevent equipment damage especially during SCADA failure situations or situations when operators fail to correctly respond on overload conditions.</p> <p>2) Regarding R13, MH does not agree adding an 15% margin to the loading limitation on a circuit that has a hard loading limit. The SDT stated that this margin is for the inherent error in the relay and the sensing circuits. However, this error could be on the opposite side, such that the relay could trip only when the actual loading is higher than 100% of the hard loading limit in which case damage to the equipment could occur.</p>
<p>Response:</p> <p>Your comments reflect a consistent position on this standard. We respect your position; however, within the industry there appears to be broad support for the position of the drafting team.</p>			
Midwest SCG		<input checked="" type="checkbox"/>	<p>The standard relies on having a list of critical lines, transformers, and "facilities". The current standards use the term critical facilities in multiple standards. It is not clear if the facilities in this standard are the same as in the existing standards. If we don't know which facilities to which the standard applies, how can it be put in place?</p>
<p>Response:</p> <p>See question #3 Summary Consideration above.</p>			
MRO		<input checked="" type="checkbox"/>	<p>The MRO does not believe that this standard in its current form is ready for ballot. The MRO believes that this standard is still too perscriptive and that there is a forced assumption of risk. The amount of risk that a company is willing to assume is a business decision that can only be determined from an in depth risk analysis.</p> <p>The MRO is interested to know if Facilities, as defined in this standard, that are determined by the PC to be critical to the reliability of the BES in its area are the same as Critical Facilities referenced in other Standards and, are these Critical Facilities covered under the heading of Critical Assets as defined in the NERC Glossary?</p>

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Question #3			
Commenter	Yes	No	Comment
			<p>Additionally, is the RC to maintain a separate list of Critical Facilities for each Standard or is there a master list of Critical Facilities that the RC is to maintain so as to avoid conflict? The MRO recommends that there be a consistent methodology throughout the standards as to what constitutes a Critical Facility. The MRO further recommends that Critical Facility be added to the list of defined terms in the Glossary.</p> <p>The VSLs do not appear to follow a smooth progression on the violation curve. For example; an Applicable Entity can violate between 1 and 13 of the subrequirements for Requirement 1 and only be in a Moderate level violation. It would appear more appropriate if there was a cut off that would constitute a High Level violation, such as violating 75% or more of the subrequirements. The same reasoning can be applied to the VSLs for the PC. The PC can go from being compliant if it gets the list of the Critical Facilities to the Applicable Entities on or before to the due date, to having a Moderate level violation for being only one day late. The MRO recommends that the VSLs for the PC with respect to Critical Facility list submission to the Applicable Entities be separated such that if the PC is between 1 and 6 days late it be given a Lower level violation and once the PC is more than 7 days late it be given a Moderate level violation.</p>
<p>Response:</p> <p>First part - see question #3 Summary Consideration above.</p> <p>Second part - It is only necessary to meet one requirement of R1.1 through R1.13 for each transmission line or transformer. It is not possible, on a given facility, to violate one, but not all of these - an entity will simply violate R1.</p> <p>Third part - The compliance staff asserts that the Violation Severity Levels do follow a smooth progression. A lower violation means that while the responsible entity complied with the criteria laid out in the above sub-requirements, they did not obtain the agreement on the calculated capability from the Reliability Coordinator, Transmission Operator, and the Planning Coordinator.</p> <p>A moderate violation is one that while the responsible entity attempted to use the criteria in the appropriate sub-requirement of R1.1-R1.13, it is either incomplete or incorrect. Please note that R1 is written such that the responsible entity is supposed to identify which method of relay setting is correct and to calculate the setting based on those criteria; not to comply with all of the sub-requirements.</p> <p>A severe violation is when the relay settings do not comply with any of the requirements in R1.1 through R1.13, or that no</p>			

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Question #3			
Commenter	Yes	No	Comment
<p>evidence exists to show that the relay setting comply with those criteria. This means that the responsible entity did not calculate a relay setting based on any one of the sub-requirements, or they do not have the evidence to show that they have. Since it is not possible to prove compliance without evidence, both of these are rated as a severe violation.</p> <p>With respect to the issue of lateness in providing a list of critical facilities. The compliance element drafting team felt that a lower severity level is inappropriate in this case as the entity is not 'mostly compliant' but is deficient with respect to one or more sub-requirements [minor detail]. The compliance element drafting team felt that providing a list of critical facilities is a significant element of this standard, and therefore falls appropriately under a moderate severity level. The proposed definition of a moderate severity level is "The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements."</p> <p>The team felt that adding in an additional step from 46-60 days was appropriate before increasing the level of severity of the violation to "Severe", which is why the standard currently lists the failure to provide the list of critical facilities to the appropriate entities until 46-60 days after the list was made or updated, as a high severity level violation.</p>			
NYISO		<input checked="" type="checkbox"/>	<p>The NYISO believes that this standard should only apply to the BPS as determined by an approved FERC filed BPS region specific impact based methodology. Hence the standard should have references removed that specify voltage level and should only reference the BPS. There are many instances where 200kV and higher transmission lines do not constitute a BPS facility and on a going forward basis if further 200kV lines are built or relay loadability requirements are adjusted, the only lines that should be considered are BPS lines determined from an impact based methodology. Presently the standard only has an implicit impact based determined BPS in the 100-200kV class.</p> <p>A suggested change to address the issue we raise is to change the applicability to 100kV and above as determined by the Planning Coordinator.</p>
Response: See Question #3 Summary Consideration above.			
FirstEnergy	<input checked="" type="checkbox"/>		
Pepco Holdings, Inc.	<input checked="" type="checkbox"/>		