

Comment Form — 1st Posting of Reliability Coordination SAR

Please use this form to submit comments on the Reliability Coordination SAR. Comments must be submitted by **February 14, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "Reliability Coordination" in the subject line. If you have questions, please contact Maureen Long at maureen.long@nerc.net or by telephone at 813-468-5998.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Brian Thumm	
Organization:	ITC Transmission	
Telephone:	248.374.7846	
E-mail:	bthumm@itctransco.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations, Regional Entities

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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

The purpose of this SAR is to review the set of standards that includes reliability coordinator requirements with the intent of eliminating duplicate requirements and upgrading and reorganizing the requirements to ensure that there are requirements that address the reliability coordinator's processes, procedures, plans, tools, and authorities to support real-time operating reliability within its own reliability area and between reliability coordinator areas in support of reliability of the interconnected bulk power systems.

The scope of the SAR includes the following:

- The drafting team will review all of the requirements in this set of standards and eliminate all of the requirements that are redundant. There are redundancies between requirements in the IRO-sequence of standards and also redundancies between requirements in the IRO-sequence of standards and the ORG-sequence of standards, and redundancies with PER-004, COM-001, COM-002, and PRC-001. Note that there will be a new standard to address communication protocols (Project 2007-02) and requirements for real-time communication protocols need to be transferred to that new standard.
- The drafting team also needs to review requirements and ensure that the distinctions between the functional entity and the real-time system operator are clear and distinct. The requirements should be written for the functional entity.
- The drafting team also needs to clarify the responsibilities and authorities in the requirements when comparing the "reliability coordinator" and the "transmission operator."
- The drafting team needs to verify that requirements exempt the real time-operator from liability when making a good faith effort at preserving reliability.
- The drafting team needs to address the reliability coordinator's facilities. A challenge has been to require that entities have "facilities" in place and available to the real-time system operators. These facilities are reviewed during certification, and unless there is a specific requirement to review these facilities, they may not be reviewed after the initial certification. To eliminate redundancy between the "certification" standards and the standards that are aimed more at real-time operations, the certification standards could be phrased to clarify that entities are required to "have and maintain" the specified facilities. This would enable the compliance monitor to check facilities on a periodic basis. While checking the facilities that are used on a daily basis may not be necessary, making periodic checks of the facilities that are infrequently would motivate entities to maintain these facilities, e.g., "Shall have a back-up power supply for critical operations, and shall maintain and test at least once per year."
- The results of the Operating Committee's study on operator situational awareness tools should be used to verify that the requirements in the certification standards will meet reliability needs.
- This project also needs to be coordinated with the project for developing transmission operator and balancing authority standards (2007-06).
- IRO-001 has some "fill-in-the-blank" components to eliminate.

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- The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

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You do not have to answer all questions. Enter All Comments in Simple Text Format.

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

1. Do you agree that there is a reliability-related need to for the proposed revisions to this set of standards? If not, please explain in the comment area.

Yes

No

Comments: Yes, there is a reliability need to revise the Standards identified in this SAR. Not all of the revisions described, however, are reliability related and in fact should not be included in the standards (e.g., exempting an operator from liability).

2. Do you agree with the scope of the SAR? If not, please explain in the comment area.

Yes

No

Comments: The Standard Drafting Team should not be given latitude to "include other improvements to the standards deemed appropriate by the drafting team." The purpose of the SAR is to identify the changes contemplated by the need for the Standard Revision. If there are changes that the SAR requestor would like to make to the Standard, they should be spelled out in the SAR. If the SAR requestor does not really know the changes that should be made to the standard, then the SAR should be withdrawn until the need for a SAR can be adequately justified.

The remainder of the SAR is very broad; perhaps too broad. The requestor should consider reducing the scope of the SAR to make specific changes to the standards, rather than try to consolidate all of the Standards in one swift stroke.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments: Uncertain to say what they would be at this point.

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(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
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Group Comments (Complete this page if comments are from a group.)

Group Name: IRC Standards Review Committee
Lead Contact: Charles Yeung
Contact Organization: SPP
Contact Segment: 2
Contact Telephone: 832-724-6142
Contact E-mail: cyeung@spp.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Mike Calimano	NYISO	NPCC	2
Alicia Daugherty	PJM	RFC	2
Ron Falsetti	IESO	NPCC	2
Matt Goldberg	ISO-NE	NPCC	2
Brent Kingsford	CAISO	WECC	2
Anita Lee	AESO	WECC	2
Steve Myers	ERCOT	ERCOT	2
Bill Phillips	MISO	RFC	2
		SERC	
		MRO	

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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

1. Do you agree that there is a reliability-related need to for the proposed revisions to this set of standards? If not, please explain in the comment area.

Yes

No

Comments: The IRC agrees with the objective but does not agree with the process.

We agree there is a general need to clean up the standards and where appropriate consolidate the standards. However, this SAR covers too large a swath of standards, and as a consequence the resulting standard has the potential of being too large for reasoned comments.

The SRC believes that the wide perspective proposed by this SAR could compromise the internal consistency within individual standards. Subject Matter experts created interrelated requirements in given areas. This SAR proposes to impose a vertically integrated prospective, linking standards in widely dispersed areas of operational expertise. While a review of the vertical integration is useful and in places needed, it is recommended that the results of the review should themselves be sent as recommended SARs for industry consideration by the SMEs for the individual standards, and not as a proposed ad hoc standard. Grouping them as proposed in the SAR may result in unintended disconnects within the other standards, and in the worst case result in an ongoing series of iterative SARs.

2. Do you agree with the scope of the SAR? If not, please explain in the comment area.

Yes

No

Comments: We do agree the standards should be consolidated and redundancies eliminated where appropriate.

However, it is not appropriate to include standards in this SAR that have not yet been approved. For example, it is not necessary to expand on the requirement to have facilities in place by adding a testing requirement. If an entity is required to have facilities in place and they are not maintained and available, they do not meet the requirement.

The "boiler plate" language that this "development may include other improvements deemed appropriate by the drafting team" is too vague and essentially opens the scope to include anything the drafting team wants to do with the standard. This is not appropriate. The scope should be specific and the drafting team should only focus on those specifics.

The SRC supports the approach of prioritizing and revising individual standards to include FERC's comments as part of the consideration process. Only a few standards should be revised at a time to make the process more manageable.

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3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	David Kiguel	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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Contact Organization:

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Yes

No

Comments:

2. Do you agree with the scope of the SAR? If not, please explain in the comment area.

Yes

No

Comments: Please see our answer to question No. 3.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments: This project involves the revision of 27 NERC Standards, not a small task by any measure. The extent of the proposed work and the necessary expertise is beyond what can be found in one single SAR team and drafting team.

We respectfully submit that the project be divided into as many SARs and teams as necessary with the work directed and monitored by the Standards Committee.

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Group Comments (Complete this page if comments are from a group.)

Group Name: Midwest ISO Stakeholders Standards Collaboration Participants
Lead Contact: Jason Marshall
Contact Organization: Midwest ISO
Contact Segment: 2
Contact Telephone: 317-249-5494
Contact E-mail: jmarshall@midwestiso.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Jim Cyrulewski	JDRJC Associates	RFC	8

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

1. Do you agree that there is a reliability-related need to for the proposed revisions to this set of standards? If not, please explain in the comment area.

Yes

No

Comments: We agree there is a general need to consolidate where necessary and clean up the standards. However, this SAR covers too large a swath of standards. It very confusing what the overall goal is. Additionally, we are concerned that the range of expertise required by this SAR will result in a drafting team that is too large and will result in little to no progress unless the drafting team is subdivided. If the drafting team is subdivided, then this SAR should be subdivided into other SARs.

2. Do you agree with the scope of the SAR? If not, please explain in the comment area.

Yes

No

Comments: We do agree the standards should be consolidated and redundancies eliminated where appropriate. However, it is not appropriate to include standards in this SAR that have not yet been approved.

It is not necessary to expand on the requirement to have facilities in place by adding a testing requirement. If an entity is required to have facilities in place and they are not maintained and available, they do not meet he requirement of having facilities in place.

The "boiler plate" language that this "development may include other improvements deemed appropriate by the drafting team is too vague and essentially opens the scope to include anything the drafting team wants to do with the standard. This is not appropriate. The scope should be specific and the drafting team should only focus on those specifics.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments: Because of the overbroad nature of this SAR, the answer is likely yes. However, it is nearly impossible to determine all the additional required changes without missing important items. This SAR needs to be broken down to address individual standards.

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(Complete this page for comments from one organization or individual.)		
Name:	Kathleen Goodman	
Organization:	ISO New England	
Telephone:	(413) 535-4111	
E-mail:	kgoodman@iso-ne.com	
NERC Region		Registered Ballot Body Segment
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Yes

No

Comments: ISO New England supports the objective but does not agree with the process.

We agree there is a general need to clean up the standards and where appropriate consolidate the standards. However, this SAR covers too large a swath of standards, and as a consequence the resulting standard has the potential of being too large for reasoned comments.

We are concerned that the wide perspective proposed by this SAR could compromise the internal consistency within individual standards. Subject Matter Experts created interrelated requirements in given areas. This SAR proposes to impose a vertically integrated prospective, linking standards in widely dispersed areas of operational expertise. While a review of the vertical integration is useful and in places needed, it is recommended that the results of the review should themselves be sent as recommended SARs for industry consideration by the SMEs for the individual standards, and not as a proposed ad hoc standard. Grouping them as proposed in the SAR may result in unintended disconnects within the other standards, and in the worst case result in an ongoing series of iterative SARs.

2. Do you agree with the scope of the SAR? If not, please explain in the comment area.

Yes

No

Comments: We do agree the standards should be consolidated and redundancies eliminated where appropriate.

However, it is not appropriate to include standards in this SAR that have not yet been approved. For example, it is not necessary to expand on the requirement to have facilities in place by adding a testing requirement. If an entity is required to have facilities in place and they are not maintained and available, they do not meet the requirement.

The "boiler plate" language that this "development may include other improvements deemed appropriate by the drafting team" is too vague and essentially opens the scope to include anything the drafting team wants to do with the standard. This is not appropriate. The scope should be specific and the drafting team should only focus on those specifics.

ISO New England supports the approach of prioritizing and revising individual standards to include FERC's comments as part of the consideration process. We also support the

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consideration of non-FERC industry comments submitted previously in the commenting process where the requirements were not available for commenting.

Only a few standards should be revised at a time to make the process more manageable.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Mike Gentry	
Organization:	Salt River Project	
Telephone:	602-236-6408	
E-mail:	Mike.Gentry@srpnet.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations, Regional Entities

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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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The scope of the SAR includes the following:

- The drafting team will review all of the requirements in this set of standards and eliminate all of the requirements that are redundant. There are redundancies between requirements in the IRO-sequence of standards and also redundancies between requirements in the IRO-sequence of standards and the ORG-sequence of standards, and redundancies with PER-004, COM-001, COM-002, and PRC-001. Note that there will be a new standard to address communication protocols (Project 2007-02) and requirements for real-time communication protocols need to be transferred to that new standard.
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- This project also needs to be coordinated with the project for developing transmission operator and balancing authority standards (2007-06).
- IRO-001 has some "fill-in-the-blank" components to eliminate.

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

1. Do you agree that there is a reliability-related need to for the proposed revisions to this set of standards? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of the SAR? If not, please explain in the comment area.

Yes

No

Comments:

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
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	<input type="checkbox"/>	10 — Regional Reliability Organizations, Regional Entities

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Yes

No

Comments:

2. Do you agree with the scope of the SAR? If not, please explain in the comment area.

Yes

No

Comments: We believe that the drafting needs to verify that requirements exempt the reliability coordinator real-time supervision, as well as the real-time operator from liability when making a good faith effort at preserving reliability.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments:

The WECC RCCWG believes that the FERC Staff Report suggestion that COM-001 "generation owners missing" should not translate to addition of generation owners in the applicability. "Generator Operator" is an applicable entity, but not "Generator Owner".

The WECC RCCWG believes the Reliability Coordination SAR should address those VO comments on requirements, when those specific are no longer part of the standard referenced in the VO comments identified in Attachment 1 of the SAR if those comments were not previously addressed. One example: posted "VO Industry Comments" suggest inclusion of sabotage and security in R2 of COM-002. That comment is no longer applicable to COM-002 R2 - the standard requirements have changed. That said, the comment intent should not be lost.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
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	<input type="checkbox"/>	10 — Regional Reliability Organizations, Regional Entities

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Group Comments (Complete this page if comments are from a group.)

Group Name: Public Service Commission of South Carolina
Lead Contact: Phil Riley
Contact Organization: Public Service Commission of South Carolina
Contact Segment: 9
Contact Telephone: 803-896-5154
Contact E-mail: philip.riley@psc.sc.gov

Additional Member Name	Additional Member Organization	Region*	Segment*
Mignon L. Clyburn	Public Service Commission of SC	SERC	9
Elizabeth B. Fleming	Public Service Commission of SC	SERC	9
G. O'Neal Hamilton	Public Service Commission of SC	SERC	9
John E. Howard	Public Service Commission of SC	SERC	9
Randy Mitchell	Public Service Commission of SC	SERC	9
C. Robert Moseley	Public Service Commission of SC	SERC	9
David A. Wright	Public Service Commission of SC	SERC	9

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

1. Do you agree that there is a reliability-related need to for the proposed revisions to this set of standards? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of the SAR? If not, please explain in the comment area.

Yes

No

Comments:

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Roger Champagne	
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Telephone:	514 289-2211; X 2766	
E-mail:	champagne.roger.2@hydro.qc.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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1. Do you agree that there is a reliability-related need to for the proposed revisions to this set of standards? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of the SAR? If not, please explain in the comment area.

Yes

No

Comments: Please see our answer to question No. 3.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments: This project involves the revision of 27 NERC Standards, not a small task by any measure. The extent of the proposed work and the necessary expertise is beyond what can be found in one single SAR team and drafting team.

We respectfully submit that the project be divided into as many SARs and teams as necessary with the work directed and monitored by the Standards Committee.

Also, coordination with the Standards in development IRO-007-1 to IRO-010-1 that are also the object of a separate revision and commentary period should be taken care of.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs,
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that there is a reliability-related need to for the proposed revisions to this set of standards? If not, please explain in the comment area.

Yes

No

Comments: The IESO agrees with the objective but does not agree with the process. There is a general need to clean up the standards and where appropriate consolidate the standards. However, this SAR covers too large a swath of standards, and as a consequence the resulting standard has the potential of being too large for reasoned comments.

2. Do you agree with the scope of the SAR? If not, please explain in the comment area.

Yes

No

Comments:

We agree with the intent to fill in the gaps and eliminate duplications among standards, and applaud the SDT for taking on this huge and challenging task. We are concerned, however, that the scope itself is too wide but yet not wide enough. Some of the listed standards are still being commented on, for example: IROL-007 to IRO-010, while some others had been commented on but are now in a dormant state, for example: the organization certification standards. These standards are not yet approved, and hence are subject to change and become moving targets for this holistic review task. The scope description does not suggest an approach to deal with ongoing changes to the standards identified. We are concerned that the wide scope and the massive task may not ensure that a one time change will cover all affected standards - those approved and those under development.

We suggest the SDT compare this approach to an alternative approach which is to revise a few standards at a time, on a priority basis and considering FERC's views on the status of the standards, thereby limiting the corresponding changes within a more manageable scope. Overtime, when all standards have gone through revisions, all corresponding changes will be duly made.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments:

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There are likely additional standard revisions beyond those identified, but we find it's almost impossible to pre-determine which other standards will be affected as a result of changes to those identified in this SAR.

For example, changes currently proposed for IRO-007 to IRO-010 will precipitate corresponding changes to other affected standards, e.g. TOP-003, TOP-005, etc. However, we are unable to provide any specific list of standards that will require corresponding changes not knowing what changes will be made to the standards listed in the SAR.

Given the above, it should not be taken for granted that the list is exhaustive in terms of revisions required.

Comment Form — 1st Posting of Reliability Coordination SAR

Please use this form to submit comments on the Reliability Coordination SAR. Comments must be submitted by **February 14, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "Reliability Coordination" in the subject line. If you have questions, please contact Maureen Long at maureen.long@nerc.net or by telephone at 813-468-5998.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Jason Shaver	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input checked="" type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations, Regional Entities

Background Information

The purpose of this SAR is to review the set of standards that includes reliability coordinator requirements with the intent of eliminating duplicate requirements and upgrading and reorganizing the requirements to ensure that there are requirements that address the reliability coordinator's processes, procedures, plans, tools, and authorities to support real-time operating reliability within its own reliability area and between reliability coordinator areas in support of reliability of the interconnected bulk power systems.

The scope of the SAR includes the following:

- The drafting team will review all of the requirements in this set of standards and eliminate all of the requirements that are redundant. There are redundancies between requirements in the IRO-sequence of standards and also redundancies between requirements in the IRO-sequence of standards and the ORG-sequence of standards, and redundancies with PER-004, COM-001, COM-002, and PRC-001. Note that there will be a new standard to address communication protocols (Project 2007-02) and requirements for real-time communication protocols need to be transferred to that new standard.
- The drafting team also needs to review requirements and ensure that the distinctions between the functional entity and the real-time system operator are clear and distinct. The requirements should be written for the functional entity.
- The drafting team also needs to clarify the responsibilities and authorities in the requirements when comparing the "reliability coordinator" and the "transmission operator."
- The drafting team needs to verify that requirements exempt the real time-operator from liability when making a good faith effort at preserving reliability.
- The drafting team needs to address the reliability coordinator's facilities. A challenge has been to require that entities have "facilities" in place and available to the real-time system operators. These facilities are reviewed during certification, and unless there is a specific requirement to review these facilities, they may not be reviewed after the initial certification. To eliminate redundancy between the "certification" standards and the standards that are aimed more at real-time operations, the certification standards could be phrased to clarify that entities are required to "have and maintain" the specified facilities. This would enable the compliance monitor to check facilities on a periodic basis. While checking the facilities that are used on a daily basis may not be necessary, making periodic checks of the facilities that are infrequently would motivate entities to maintain these facilities, e.g., "Shall have a back-up power supply for critical operations, and shall maintain and test at least once per year."
- The results of the Operating Committee's study on operator situational awareness tools should be used to verify that the requirements in the certification standards will meet reliability needs.
- This project also needs to be coordinated with the project for developing transmission operator and balancing authority standards (2007-06).
- IRO-001 has some "fill-in-the-blank" components to eliminate.

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- The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

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You do not have to answer all questions. Enter All Comments in Simple Text Format.

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

1. Do you agree that there is a reliability-related need to for the proposed revisions to this set of standards? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of the SAR? If not, please explain in the comment area.

Yes

No

Comments: ATC agrees with the spirit of the SAR but believes that more details should be provided.

Identify which of the redundant requirements will be deleted.

Lastly ATC does not understand how a SDT can tackle the ORG -020 – 027 when these standards have not been approved by the board. In other words how can the SDT move forward on the scope when eight of the standards are still in being worked on? To approve the scope of the SAR references to ORG-020 – 027 should be deleted and considered out of bounds for the SDT.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments: