

Comment Report

Project Name: Technical Rationale for Reliability Standards
Comment Period Start Date: 11/4/2019
Comment Period End Date: 12/18/2019
Associated Ballots: Technical Rationale for Reliability Standards IRO-001-4 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards IRO-002-6 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards IRO-006-EAST-2 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards IRO-008-2 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards IRO-009-2 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards IRO-010-2 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards IRO-014-3 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards IRO-017-1 Non-Binding Poll IN 1 NB
Technical Rationale for Reliability Standards IRO-018-1(i) Non-Binding Poll IN 1 NB

There were 27 sets of responses, including comments from approximately 74 different people from approximately 58 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. IRO-001-4: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

2. IRO-002-6: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

3. IRO-006-EAST-2: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

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

5. IRO-009-2: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

6. IRO-010-2^[1]: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

^[1] Project 2017-07 Standards Alignment with Registration currently has version IRO-010-3 posted for comment and ballot. Version 3 removes the Load Serving Entity from the standard which does not affect the Technical Rationale. If version 3 is approved by industry, NERC staff will make the corresponding changes to IRO-010 and its corresponding Technical Rationale document.

7. IRO-014-3: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

8. IRO-017-1: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

9. IRO-018-1(i): Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Southwest Power Pool, Inc. (RTO)	Charles Yeung	2	SPP RE	SRC 2020	Charles Yeung	SPP	2	MRO
					Ali Miremadi	CAISO	1	WECC
					Nathan Bigbee	ERCOT	1	Texas RE
					Helen Lainis	IESO	1	NPCC
					Matt Goldberg	ISONE	1	NPCC
					Dave Zwergel	MISO	3	MRO
					Greg Campoli	NYISO	1	NPCC
Douglas Webb	Douglas Webb		MRO,SPP RE	Westar-KCPL	Doug Webb	Westar	1,3,5,6	MRO
					Doug Webb	KCP&L	1,3,5,6	MRO
Duke Energy	Kim Thomas	1,3,5,6	FRCC,RF,SERC	Duke Energy	Laura Lee	Duke Energy	1	SERC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Energy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Helen Lainis	IESO	2	NPCC
					Sean Cavote	PSEG	4	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC

David Kiguel	Independent	NA - Not Applicable	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
Nick Kowalczyk	Orange and Rockland	1	NPCC
Joel Charlebois	AESI - Acumen Engineered Solutions International Inc.	5	NPCC
Mike Cooke	Ontario Power Generation, Inc.	4	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Shivaz Chopra	New York Power Authority	5	NPCC
Mike Forte	Con Ed - Consolidated Edison	4	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Ashmeet Kaur	Con Ed - Consolidated Edison	5	NPCC
Caroline Dupuis	Hydro Quebec	1	NPCC
Chantal Mazza	Hydro Quebec	2	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC

					Laura McLeod	NB Power Corporation	5	NPCC
					Randy MacDonald	NB Power Corporation	2	NPCC
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					John Hastings	National Grid	1	NPCC
					Michael Jones	National Grid USA	1	NPCC
OGE Energy - Oklahoma Gas and Electric Co.	Sing Tay	6	SPP RE	OKGE	Sing Tay	OGE Energy - Oklahoma	6	MRO
					Terri Pyle	OGE Energy - Oklahoma Gas and Electric Co.	1	MRO
					Donald Hargrove	OGE Energy - Oklahoma Gas and Electric Co.	3	MRO
					Patrick Wells	OGE Energy - Oklahoma Gas and Electric Co.	5	MRO

1. IRO-001-4: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

I don't think this is necessary. It as inefficient for NERC and us. This would make four documents per Standard: The Standard itself, Implementation Plan, Technical Rational, and Reliability Standard Audit Worksheet (RSAW). It is not efficient to have to look through four separate documents for one standard. Regardless, changes are not needed immediately. If changes are needed, they should be done during the standards 5-year review.

Why are we even doing this? Some auditors audit to the standard, not the Guidance and Technical Basis (GBT). NERC/FERC need to require auditor's to consider GTB, else this is a pointless endeavor.

What is the Point of a Standards' GTB section, or the Applicability section, if Auditors don't consider them during an Audit?

It appears that FERC Auditors in their CIP-002 2017 Audit Lessons Learned document (section 3 page 10) did not consider the GTB and Applicable sections, nor NERC Glossary of Terms.

FERC claims CIP-002-5.1a IRC 2.11 is applicable to non-BES generation. The standard applicability section, attachment 1, and the GTB are all part of the Standard; and indicate it is applicable to BES Facilities; there is no mention of non-BES. If something is omitted from the applicability section it means the standard does not apply. If attachment 1 (which contains the IRCs) is part of the standard than the GTB is too. The applicability section of the standard applies to the entire standard including its attachments.

BES reliability operating services (BROS) are BES operating services. GOP's do not have GOP functional objections to non-BES generation; only to BES Generation Facilities (see NERC Glossary of Terms) for which they Own and Operator, or have other agreement/CFR NERC obligations.

Why does/has WECC, NERC, and FERC discussed CIP BES reliability operating services (BROS), but ignored other parts of the GTB? The entire BROS concept and discussion is in the CIP-002 GTB (which is part of the standard) and in other NERC/WECC documents that are not part of the standard. If the GTB is to be ignored so should BROS which is in the GTB and non-CIP standard documents.

Industry never had an opportunity to vote/ballot on the aforementioned FERC CIP-002 IRC 2.11 interpretation. FERC should have sent this to the CIP drafting team for proper interpretation. Why does industry have to submit a formal request for interpretation but FERC does not? Industry voted on CIP-002-5 with the understanding it was applicable to BES only, which is what the drafting team, at the time, advertised.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer	No
Document Name	
Comment	
<p>1. I don't think this is necessary and see it as a waste of time for NERC and us. In the future we will have four documents per Standard: The Standard itself, Implementation Plan, Technical Rational, and Reliability Standard Audit Worksheet (RSAW). It is not efficient to have to look through four separate documents for one standard. At a minimum, wait until 5-year review.</p> <p>Additionally, NERC/FERC needs to decide if Technical Rational shall be used by the Auditor. Some auditors claim they audit to the standard not the GBT.</p> <p>Additionally, what is the Point of the Standards Sections, namely: Applicability and GBT? For instance, FERC in their 2017 Audit Lessons Learned document ignored the CIP-002 Applicability and GBT Sections. CIP-002 is a BES only Applicable standard and says so in numerous places in the document and even mentions everything in attachments are applicable to BES Facilities (not non-BES).</p> <p>I have not seen a FERC explanation as to why non-BES Generation is to be included in IRC 2.11 net real power capability. Where does the standard say non-BES generation is to be included? To date I have not seen a FERC document justifying why the Applicability and GBT sections were ignored nor justifying the reasoning for the Audit lessons learned document. How do you provide a BES Reliability Operating Service to a non-BES Facility? Why would you? it is not necessary!</p> <p>Thank you for your time and consideration.</p>	
Likes	0
Dislikes	0
Response	
Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1	
Answer	No
Document Name	
Comment	
<p>We see no value in the GTB section, and are not sure how a separate Technical Rationale document would be used during enforcement. The GTB seems relevant only when the intial standard is up for approval.</p>	
Likes	0
Dislikes	0
Response	
Kjersti Drott - Tri-State G and T Association, Inc. - 1,3,5	
Answer	No
Document Name	

Comment

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

Likes 1 Northern California Power Agency, 5, Hostler Marty

Dislikes 0

Response

Michael Courchesne - Michael Courchesne On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Michael Courchesne

Answer No

Document Name

Comment

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

Likes 1 Northern California Power Agency, 5, Hostler Marty

Dislikes 0

Response

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

Answer No

Document Name

Comment

Reclamation recommends the GTB sections be contained in the same document as the standard. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.

Likes 1 Northern California Power Agency, 5, Hostler Marty

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer No

Document Name

Comment

BHE believes, in the interest of simplicity, leave the GTB attached with the NERC Standard as a point of reference when trying to understand the applicability and rationale behind some of the requirements. GTB section stays with the Standard so that if any white paper is produced the edits stay with the Standard. This way we do not have to look in a different location for any edits that are pertinent to Standard. "One stop shopping."

Likes 1

Northern California Power Agency, 5, Hostler Marty

Dislikes 0

Response

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

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

General comment - The Background Information section of the comment form starts with "The current Reliability Standards template includes a Supplemental Materials (GTB and or Technical Rationale) section....". Is the ERO's current Reliability Standards template available to industry, and if so where is it posted? What internal controls does NERC have in place to maintain version control of the ERO's Reliability Standards template? Does NERC consider multiple formats for its active Reliability Standards a best practice? If not, what is NERC's timeline for achieving a consistent format for all active Reliability Standards (including the Regional ones)?

Presently, some of NERC's active Reliability Standards contain supplemental information (such as a "Guidelines and Technical Basis" section) and others do not. In the case of these IRO standards, it appears that all of the information being proposed for removal from each standard is available in the development history of the respective standard (in the form of text box notations in final draft standards). Instead

of creating new and separate “Technical Rationale” documents, we suggest that the version history tables simply point back to the project that generated these notations. For example, for IRO-001-4, the version history “action” could read: “The ‘Guidelines and Technical Basis’ section of the standard was removed. The information removed is available in the final draft version of IRO-001-4 (Project 2014-03). Because no changes were made to the mandatory and enforceable elements of the standard, the version number remains unchanged.”

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Rationale for Applicability Section and Rationale for Requirements R2 and R3 are no longer necessary and should be removed from the Standard instead of transferring to a Technical Rationale document. *Rationale for Change from Reliability Directive to Operating Instruction* is also no longer necessary and should be removed from the Standard since Operating Instruction is now a defined term in the NERC Glossary.

Likes 0

Dislikes 0

Response

faranak sarbaz - Los Angeles Department of Water and Power - 1

Answer

No

Document Name

Comment

LDWP does not agree with this recommendation for two reasons. First, as these changes would be limited to a subset of the Standards, it would create a consistency issue across the Standards. Second, it would add to the number of separate documents to track for each Standard, such as the Implementation Plan.

Likes 0

Dislikes 0

Response

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

Answer	No
Document Name	
Comment	
LDWP does not agree with this recommendation for two reasons. First, as these changes would be limited to a subset of the Standards, it would create a consistency issue across the Standards. Second, it would add to the number of separate documents to track for each Standard, such as the Implementation Plan.	
Likes 0	
Dislikes 0	
Response	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.	
Likes 0	
Dislikes 0	
Response	

Answer

Yes

Document Name

Comment

Duke Energy does not have comments.

VACAR South comments follow:

VACAR South (VACS) reluctantly agrees with the recommendation to transition the GTB section of the identified standards in this posting to a separate Technical Rationale document, but has some comments for the Guidelines and Technical Basis (GTB) Review Team to consider. The comments in this response apply to each of the standards included in this posting.

a) VACS considers the removal of the GTB an 'Errata' change and the version number should be changed for each standard. VACS understands the reason why the GTB Review Team went with this approach as stated in the Version History, *"Because no changes were made to the mandatory and enforceable elements of the standard, the version number remains unchanged."*

However, a section of each standard is being removed, thus it is being changed and should reflect that in the version number.

i. The Rules of Procedure (ROP), section 4.4.2, mentions a drafting team may develop reference documents designed to provide the team's technical rationale and when standard was developed this section was likely part of the informal and/or formal comment period.

ii. The Compliance Guidance Policy states that the "Guidelines and Technical Basis" section is part of the Reliability Standards in the 'Background' section of the Policy document.

iii. According to the "NERC Standards Numbering System" document, an Errata change seems to be the most appropriate. This would be a period followed by a number to the right of the version number indicating an errata change e.g., IRO-001-4.1.

b) Noticed in some of the new (separate) Technical Rationale documents that some of the language from the GTB section in the standards (not all standards) was excluded. Since the GTB/Technical Rationale section is being removed from the standard, all of the language should be transitioned to the new (separate) Technical Rationale document.

c) Since the GTB/Technical Rationale section is being removed from the standard and placed in a separate document, VACS recommends the GTB Review Team consider adding a statement to the new (separate) Technical Rationale document anytime there is Compliance Guidance/ERO Enterprise-Endorsed Implementation Guidance available. For example IRO-002-6, the "CMEP Practice Guide TOP-001-4 and IRO-002-5 Redundant and Diversely Routed" is already available and the Proposed Implementation Guidance, "TOP-001-4 and IRO-002-5 Data Exchange Infrastructure and Testing (OC)" should soon be endorsed by the ERO.

i. The GTB section of the standards is useful. If removed and transitioned to the separate document, we recommend the new document include everything referencing the standard to make the document a 'One-Stop Shop' for the industry to reference to find additional information on the standard.

d) VACS recommends the GTB Review Team modify the Version History for each standard to 'Guidelines' instead of 'Guidance'. It should state *"The Guidelines and Technical Basis (including the Technical Rationale) section of the standard was removed and placed into a separate document."*

e) What internal control will the ERO have in place to ensure the proposed separate Technical Rationale document is kept updated when there are changes to a standard?

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Yes

Document Name

Comment

On behalf of Exelon, Segments: 1, 3, 5, 6

Exelon supports the removal of the GTB from IRO-001-4.

As suggested by EEI, Exelon also recommends adding the following information to the Technical Rationale being developed:

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

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

EEI supports the removal of the GTB from IRO-001-4. EEI also recommends adding the following information to the Technical Rationale being developed:

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

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

In many instances, including IRO-001-4, there is a justification for applicability of a requirement that is in response to a FERC directive that is in effect a clarification of the requirement useful for a Standards Interpretation.

"We believe that directives from a reliability coordinator or transmission operator should be mandatory at all times, and not just during emergencies (unless contrary to safety, equipment, regulatory or statutory requirements). For example, mandatory compliance with directives in non-emergency situations is important when a decision is made to alter or maintain the state of an element on the interconnected transmission network..."

In support of the effort to remove such rationales from the body of the standard, we do not disagree with removing this reference— but there should be consideration whether the actual words of the requirement should be changed to reflect the FERC intent.

Recommend the Notice of Proposed Rulemaking (NOPR) docket number be provided to further clarify the phrase "to respond to issues raised in NOPR paragraphs 55, 73, and 74."

To ensure that a reader of the standard is aware there are related notes in a separate document, hyperlinks in the standard linking to the Technical Rationale would be useful.

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Qu?bec Production - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Breene - WEC Energy Group, Inc. - 3,4,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

While Texas RE does not necessarily disagree with the approach to moving Guidelines and Technical Basis with no implementation guidance to Technical Rationale, Texas RE does note some inconsistencies found throughout this transition. Texas RE recommends the Technical Rationale team be consistent in moving the content from one place to another.

Texas RE is also concerned about finding this information after it is removed from the standard if there is no indication that there is another document for reference.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

2. IRO-002-6: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

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

Answer No

Document Name

Comment

Instead of creating a new and separate “Technical Rationale” document, we suggest that the version history table simply point back to the project that generated these notations. For IRO-002-6, the version history “action” could read: “The ‘Supplemental Material / Rationale’ section of the standard was removed. The information removed is available in the final draft version of IRO-002-4 (Project 2014-03). Because no changes were made to the mandatory and enforceable elements of the standard, the version number remains unchanged.”

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer No

Document Name

Comment

BHE believes, in the interest of simplicity, leave the GTB attached with the NERC Standard as a point of reference when trying to understand the applicability and rationale behind some of the requirements. GTB section stays with the Standard so that if any white paper is produced the edits stay with the Standard. This way we do not have to look in a different location for any edits that are pertinent to Standard. “One stop shopping.”

Likes 1	Northern California Power Agency, 5, Hostler Marty
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	No
Document Name	
Comment	
Reclamation recommends the GTB sections be contained in the same document as the standard. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.	
Likes 0	
Dislikes 0	
Response	
Michael Courchesne - Michael Courchesne On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Michael Courchesne	
Answer	No
Document Name	
Comment	
The GTB sections within the Standards provide background information and context for the Requirements and Measures, often helping interpret what is found in the Standards. Removal of this section results in less structure with interpretation of the Standards. ISO-NE would prefer that the GTB section remain in the Standard but if the GTB section is to be ultimately transitioned to a separate Technical Rationale document, it is requested that hyperlink references be provided within the Standard and the applicable Technical Rationale documents in order to maintain continuity	
Likes 0	
Dislikes 0	
Response	
Kjersti Drott - Tri-State G and T Association, Inc. - 1,3,5	
Answer	No
Document Name	
Comment	
Tri-State prefers the Guidance and Technical Basis (GTB) continue to be included in the same process as standards development. Specifically, we would like to see the GTB continue to be developed at the same time as the standard, and posted for comment at the same time as the standard.	

Without these documents combined, what assurance does industry have that they will be developed in tandem and posted for industry comment in tandem? The primary reason is to allow entities to comment on the GTB during the drafting of the standard. For example, the Virtualization project has extensive Technical Rationale which Tri-State has used as a basis for understanding the changes and for making comments on the standards under development.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

We see no value in the GTB section, and are not sure how a separate Technical Rationale document would be used during enforcement. The GTB seems relevant only when the initial standard is up for approval.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer

No

Document Name

Comment

2-7 See Response to Question 1.

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer

No

Document Name

Comment

NO. See response to Question 1.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name

Comment

In the new Technical Rationale document for IRO-002-5, there is a reference to moving the text boxes—E.G. “During development of IRO-002- 5, text boxes are embedded within the standard to explain the rationale for various parts of the standard. Upon Board adoption of IRO-002- 5, the text from the rationale text boxes will be moved to this section.” In other new Technical Rationale documents this sentence has been removed from the standard and not carried over to new Technical Rationale document. Texas RE recommends being consistent in the approach to redlining and moving information to a new template.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

As was stated in the preceding comment for IRO-001-4, in the instance of IRO-002-6, the standard was updated to reflect the intent of a FERC Directive. Consider revising the requirements of IRO-001-4 to clarify intent of the directive.

Requirement R2 from IRO-002-3 has been deleted because approved EOP-008-1, Requirement R1, part 1.6.2 addresses redundancy and back-up concerns for outages of analysis tools. New Requirement R4 (R6 in IRO-002-5) has been added to address NOPR paragraphs 96 and 97:

“...As we explain above, the reliability coordinator’s obligation to monitor SOLs is important to reliability because a SOL can evolve into an IROL during deteriorating system conditions, and for potential system conditions such as this, the reliability coordinator’s monitoring of SOLs provides a necessary backup function to the transmission operator....”

Consideration should be made to update standards language if the intent is unclear especially if it is to meet a regulatory directive.

Recommend the Notice of Proposed Rulemaking (NOPR) docket number be provided to further clarify the phrase “is in response to NOPR paragraph 64.”

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

EEI supports the removal of the GTB from IRO-002-6. EEI also recommends adding the following information to the Technical Rationale being developed:

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

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Yes

Document Name

Comment

On behalf of Exelon, Segments: 1, 3, 5, 6

Exelon supports the removal of the GTB from IRO-002-6.

As suggested by EEI, Exelon also recommends adding the following information to the Technical Rationale being developed:

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

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Duke Energy does not have comments.

VACAR South comments follow:

- a) Refer to comments in question #1.
- b) Additionally, VACS requests the GTB Review Team to include references to the Compliance Guidance documents or other references, to the new (separate) Technical Rationale document as recommended in the comments (c. and c.i.) as listed in question #1. For IRO-002-6 that is effective on 1/1/2020, the two documents listed below are applicable.
 - i. CMEP Practice Guide TOP-001-4 and IRO-002-5 Redundant and Diversely Routed
 - ii. TOP-001-4 and IRO-002-5 Data Exchange Infrastructure and Testing (OC).

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL

Answer Yes

Document Name

Comment

Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Breene - WEC Energy Group, Inc. - 3,4,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

3. IRO-006-EAST-2: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

NO. See response to Question 1.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

2-7 See Response to Question 1.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

We see no value in the GTB section, and are not sure how a separate Technical Rationale document would be used during enforcement. The GTB seems relevant only when the initial standard is up for approval.

Likes 0

Dislikes 0

Response

Kjersti Drott - Tri-State G and T Association, Inc. - 1,3,5

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Michael Courchesne - Michael Courchesne On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Michael Courchesne

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Reclamation recommends the GTB sections be contained in the same document as the standard. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer No

Document Name

Comment

BHE believes, in the interest of simplicity, leave the GTB attached with the NERC Standard as a point of reference when trying to understand the applicability and rationale behind some of the requirements. GTB section stays with the Standard so that if any white paper is produced the edits stay with the Standard. This way we do not have to look in a different location for any edits that are pertinent to Standard. "One stop shopping."

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Instead of creating a new and separate "Technical Rationale" document, we suggest that the version history table simply point back to the project that generated these notations. For IRO-006-EAST-2, the version history "action" could read: "The 'Supplemental Material / Rationale' section of the standard was removed. The information removed is available in the final draft version of IRO-006-EAST-2 (Project

2015-06). Because no changes were made to the mandatory and enforceable elements of the standard, the version number remains unchanged.”

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Both *Rationale for recommendation to retire Requirement R1* and *Rationale for recommendation to retire Requirement R3* are longer necessary as previous version of R1 and R3 were retired. *Rationale for revisions to new Requirement R1 (previously Requirement R2)* and *Rationale for Revisions to new Requirement R2 (previously Requirement R4)* are also no longer necessary as both do not provide any technical or compliance related information. Therefore, the whole GTB section needs to be removed from the Standard instead of transferring to a Technical Rationale.

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL

Answer Yes

Document Name

Comment

Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name	
Comment	
Duke Energy does not have comments.	
VACAR South comments follow:	
a) Refer to comments in question #1.	
b) All language from the GTB section in the standard should be transitioned to the new (separate) Technical Rationale document as recommended in the comment (b) listed in question #1.	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
<i>On behalf of Exelon, Segments: 1, 3, 5, 6</i>	
Exelon supports the removal of the GTB from IRO-006-EAST-2.	
As suggested by EEI, Exelon also recommends adding the following information to the Technical Rationale being developed:	
<ul style="list-style-type: none"> • Project Number under which the Technical Rationale was developed • Date the Technical Rational was originally developed • Hyperlink to the Project Page • Date the Reliability Standard was approved • Hyperlink to the Standard 	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	

Comment

EEI supports the removal of the GTB from IRO-006-EAST-2. EEI also recommends adding the following information to the Technical Rationale being developed:

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

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Recommend acronyms, e.g. FYRT, be defined the first time they are used in the document.

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thomas Breene - WEC Energy Group, Inc. - 3,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

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

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE does not have comments on this question.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

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

Answer No

Document Name

Comment

Rationales are no longer necessary and should be removed from the Standard instead of transferring to a Technical Rationale document.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Instead of creating a new and separate "Technical Rationale" document, we suggest that the version history table simply point back to the project that generated these notations. For IRO-008-2, the version history "action" could read: "The 'Guidelines and Technical Basis' section of the standard was removed. The information removed is available in the final draft version of IRO-008-2 (Project 2014-03). Because no changes were made to the mandatory and enforceable elements of the standard, the version number remains unchanged."

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer No

Document Name

Comment

BHE believes, in the interest of simplicity, leave the GTB attached with the NERC Standard as a point of reference when trying to understand the applicability and rationale behind some of the requirements. GTB section stays with the Standard so that if any white paper is produced the edits stay with the Standard. This way we do not have to look in a different location for any edits that are pertinent to Standard. "One stop shopping."

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Reclamation recommends the GTB sections be contained in the same document as the standard. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.

Likes 0

Dislikes 0

Response

Michael Courchesne - Michael Courchesne On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Michael Courchesne

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Kjersti Drott - Tri-State G and T Association, Inc. - 1,3,5

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

We see no value in the GTB section, and are not sure how a separate Technical Rationale document would be used during enforcement. The GTB seems relevant only when the initial standard is up for approval.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

2-7 See Response to Question 1.

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer

No

Document Name

Comment

NO. See response to Question 1.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

As was stated in the response to No. 1 for IRO-001-4, in the instance of IRO-008-2, the standard was updated to reflect the intent of a FERC Directive. Consider updating IRO-001-4 so that the explanation in the Technical Rationale can be retired.

Recommend the Notice of Proposed Rulemaking (NOPR) docket number be provided to further clarify the phrase "in response to NOPR paragraph 96." In addition, recommend acronyms, e.g. IERP, be defined the first time they are used in the document.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

EEI supports the removal of the GTB from IRO-008-2. EEI also recommends adding the following information to the Technical Rationale being developed:

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

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Yes

Document Name

Comment

On behalf of Exelon, Segments: 1, 3, 5, 6

Exelon supports the removal of the GTB from IRO-008-2.

As suggested by EEI, Exelon also recommends adding the following information to the Technical Rationale being developed:

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

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Duke Energy does not have comments.

VACAR South comments follow:

- a) Refer to comments in question #1.
- b) All language from the GTB section in the standard should be transitioned to the new (separate) Technical Rationale document as recommended in the comment (b) listed in question #1. The second paragraph from the redline that the GTB Review Team included with the posting was not included in the new (separate) Technical Rationale document.

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL

Answer

Yes

Document Name

Comment

Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thomas Breene - WEC Energy Group, Inc. - 3,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE recommends including the paragraph starting with phrase “Changes made to ...” to be consistent with other Standards within this project (e.g. IRO-010 has a “Rationale for Definitions” that was transferred. The original IRO-008-2 was inconsistent and did not include the header “Rationale for Definitions” but the language is identical to the IRO-010 “Rationale for Definitions” section.)

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	

5. IRO-009-2: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

NO. See response to Question 1.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

2-7 See Response to Question 1.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

We see no value in the GTB section, and are not sure how a separate Technical Rationale document would be used during enforcement. The GTB seems relevant only when the initial standard is up for approval.

Likes 0

Dislikes 0

Response

Kjersti Drott - Tri-State G and T Association, Inc. - 1,3,5

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Michael Courchesne - Michael Courchesne On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Michael Courchesne

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Reclamation recommends the GTB sections be contained in the same document as the standard. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer No

Document Name

Comment

BHE believes, in the interest of simplicity, leave the GTB attached with the NERC Standard as a point of reference when trying to understand the applicability and rationale behind some of the requirements. GTB section stays with the Standard so that if any white paper is produced the edits stay with the Standard. This way we do not have to look in a different location for any edits that are pertinent to Standard. "One stop shopping."

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Instead of creating a new and separate "Technical Rationale" document, we suggest that the version history table simply point back to the project that generated these notations. For IRO-009-2, the version history "action" could read: "The 'Supplemental Material / Rationale'

section of the standard was removed. The information removed is available in the final draft version of IRO-009-2 (Project 2015-06). Because no changes were made to the mandatory and enforceable elements of the standard, the version number remains unchanged.”

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Rationales are no longer necessary as they do not provide any technical or compliance related information. Therefore, the whole GTB section needs to be removed from the Standard instead of transferring to a Technical Rationale.

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL

Answer

Yes

Document Name

Comment

Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Duke Energy does not have comments.

VACAR South comments follow:

a) Refer to comments in question #1.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Yes

Document Name

Comment

On behalf of Exelon, Segments: 1, 3, 5, 6

Exelon supports the removal of the GTB from IRO-009-2.

As suggested by EEI, Exelon also recommends adding the following information to the Technical Rationale being developed:

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

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

As was stated in the response to No. 1 for IRO-001-4, in the instance of IRO-008-2, the standard was updated to reflect the intent of a FERC Directive. Consider updating IRO-001-4 so that the explanation in the Technical Rationale can be retired.

recommend the Notice of Proposed Rulemaking (NOPR) docket number be provided to further clarify the phrase "in response to NOPR paragraph 96." In addition, recommend acronyms, e.g. IERP, be defined the first time they are used in the document.

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Breene - WEC Energy Group, Inc. - 3,4,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer

Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	
Document Name	
Comment	
EEI supports the removal of the GTB from IRO-009-2. EEI also recommends adding the following information to the Technical Rationale being developed:	
<ul style="list-style-type: none"> • Project Number under which the Technical Rationale was developed • Date the Technical Rationale was originally developed • Hyperlink to the Project Page • Date the Reliability Standard was approved • Hyperlink to the Standard 	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	
Response	

Jamie Johnson - California ISO - 2

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

6. IRO-010-2[1]: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

[1] Project 2017-07 Standards Alignment with Registration currently has version IRO-010-3 posted for comment and ballot. Version 3 removes the Load Serving Entity from the standard which does not affect the Technical Rationale. If version 3 is approved by industry, NERC staff will make the corresponding changes to IRO-010 and its corresponding Technical Rationale document.

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

Answer No

Document Name

Comment

Instead of creating a new and separate “Technical Rationale” document, we suggest that the version history table simply point back to the project that generated these notations. For IRO-010-2, the version history “action” could read: “The ‘Guidelines and Technical Basis’ section of the standard was removed. The information removed is available in the final draft version of IRO-010-2 (Project 2014-03). Because no changes were made to the mandatory and enforceable elements of the standard, the version number remains unchanged.”

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

LDWP does not agree with this recommendation for two reasons. First, as these changes would be limited to a subset of the Standards, it would create a consistency issue across the Standards. Second, it would add to the number of separate documents to track for each Standard, such as the Implementation Plan.

Likes 0

Dislikes 0

Response

faranak sarbaz - Los Angeles Department of Water and Power - 1

Answer No

Document Name

Comment

LDWP does not agree with this recommendation for two reasons. First, as these changes would be limited to a subset of the Standards, it would create a consistency issue across the Standards. Second, it would add to the number of separate documents to track for each Standard, such as the Implementation Plan.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer

No

Document Name

Comment

BHE believes, in the interest of simplicity, leave the GTB attached with the NERC Standard as a point of reference when trying to understand the applicability and rationale behind some of the requirements. GTB section stays with the Standard so that if any white paper is produced the edits stay with the Standard. This way we do not have to look in a different location for any edits that are pertinent to Standard. "One stop shopping."

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Reclamation recommends the GTB sections be contained in the same document as the standard. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.

Likes 0

Dislikes 0

Response

Michael Courchesne - Michael Courchesne On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Michael Courchesne

Answer

No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Kjersti Drott - Tri-State G and T Association, Inc. - 1,3,5

Answer

No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

We see no value in the GTB section, and are not sure how a separate Technical Rationale document would be used during enforcement. The GTB seems relevant only when the initial standard is up for approval.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

2-7 See Response to Question 1.

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

NO. See response to Question 1.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name**Comment**

Recommend acronyms, e.g. FYRT, be defined the first time they are used in the document and that the Notice of Proposed Rulemaking (NOPR) docket number be provided to further clarify phrases where references are made to NOPRs.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

EEI supports the removal of the GTB from IRO-010-2. EEI also recommends adding the following information to the Technical Rationale being developed:

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

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Yes

Document Name

Comment

On behalf of Exelon, Segments: 1, 3, 5, 6

Exelon supports the removal of the GTB from IRO-010-2.

As suggested by EEI, Exelon also recommends adding the following information to the Technical Rationale being developed:

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

- Date the Reliability Standard was approved
- Hyperlink to the Standard

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Duke Energy does not have comments.

VACAR South comments follow:

a) Refer to comments in question #1.

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL

Answer Yes

Document Name

Comment

Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.

Likes 0

Dislikes 0

Response

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

Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Breene - WEC Energy Group, Inc. - 3,4,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jamie Johnson - California ISO - 2	
Answer	
Document Name	
Comment	
CAISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee.	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	

Texas RE does not have comments on this question.

Likes 0

Dislikes 0

Response

7. IRO-014-3: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

NO. See response to Question 1.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

2-7 See Response to Question 1.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

We see no value in the GTB section, and are not sure how a separate Technical Rationale document would be used during enforcement. The GTB seems relevant only when the initial standard is up for approval.

Likes 0

Dislikes 0

Response

Kjersti Drott - Tri-State G and T Association, Inc. - 1,3,5

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Michael Courchesne - Michael Courchesne On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Michael Courchesne

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Reclamation recommends the GTB sections be contained in the same document as the standard. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer No

Document Name

Comment

BHE believes, in the interest of simplicity, leave the GTB attached with the NERC Standard as a point of reference when trying to understand the applicability and rationale behind some of the requirements. GTB section stays with the Standard so that if any white paper is produced the edits stay with the Standard. This way we do not have to look in a different location for any edits that are pertinent to Standard. "One stop shopping."

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Instead of creating a new and separate "Technical Rationale" document, we suggest that the version history table simply point back to the project that generated these notations. For IRO-014-3, the version history "action" could read: "The 'Guidelines and Technical Basis' section

of the standard was removed. The information removed is available in the final draft version of IRO-014-3 (Project 2014-03). Because no changes were made to the mandatory and enforceable elements of the standard, the version number remains unchanged.”

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL

Answer

Yes

Document Name

Comment

Westar Energy and Kansas City Power & Light support Edison Electric Institute’s response.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Duke Energy does not have comments.

VACAR South comments follow:

- a) Refer to comments in question #1.
- b) All language from the GTB section in the standard should be transitioned to the new (separate) Technical Rationale document as recommended in comment (b) listed in question #1.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

On behalf of Exelon, Segments: 1, 3, 5, 6

Exelon supports the removal of the GTB from IRO-014-3.

As suggested by EEI, Exelon also recommends adding the following information to the Technical Rationale being developed:

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

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Breene - WEC Energy Group, Inc. - 3,4,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2020	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	
Document Name	
Comment	
N/A	

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

EEI supports the removal of the GTB from IRO-014-3. EEI also recommends adding the following information to the Technical Rationale being developed:

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

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE does not have comments on this question.

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

8. IRO-017-1: Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

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

Answer No

Document Name

Comment

Instead of creating a new and separate “Technical Rationale” document, we suggest that the version history table simply point back to the project that generated these notations. For IRO-017-1, the version history “action” could read: “The ‘Guidelines and Technical Basis’ section of the standard was removed. The information removed is available in the final draft version of IRO-017-1 (Project 2014-03). Because no changes were made to the mandatory and enforceable elements of the standard, the version number remains unchanged.”

Likes 0

Dislikes 0

Response

faranak sarbaz - Los Angeles Department of Water and Power - 1

Answer No

Document Name

Comment

LDWP does not agree with this recommendation for two reasons. First, as these changes would be limited to a subset of the Standards, it would create a consistency issue across the Standards. Second, it would add to the number of separate documents to track for each Standard, such as the Implementation Plan.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

LDWP does not agree with this recommendation for two reasons. First, as these changes would be limited to a subset of the Standards, it would create a consistency issue across the Standards. Second, it would add to the number of separate documents to track for each Standard, such as the Implementation Plan.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer

No

Document Name

Comment

BHE believes, in the interest of simplicity, leave the GTB attached with the NERC Standard as a point of reference when trying to understand the applicability and rationale behind some of the requirements. GTB section stays with the Standard so that if any white paper is produced the edits stay with the Standard. This way we do not have to look in a different location for any edits that are pertinent to Standard. "One stop shopping."

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Reclamation recommends the GTB sections be contained in the same document as the standard. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.

Likes 0

Dislikes 0

Response

Michael Courchesne - Michael Courchesne On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Michael Courchesne

Answer

No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Kjersti Drott - Tri-State G and T Association, Inc. - 1,3,5

Answer

No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

We see no value in the GTB section, and are not sure how a separate Technical Rationale document would be used during enforcement. The GTB seems relevant only when the initial standard is up for approval.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

2-7 See Response to Question 1.

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

NO. See response to Question 1.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name**Comment**

This last statement in this rationale for R4 has an element of clarification that can be applied for compliance and audit purposes and may need to be included in a compliance guidance document:

Rationale for R4: The SDT has re-written Requirement R4 to show that the process starts with the Planning Assessments created by the Planning Coordinator and Transmission Planner and then those Planning Assessments are reviewed and reconciled as needed with the Reliability Coordinator. This is in response to comments in paragraph 90 of the FERC NOPR about directly involving the Reliability Coordinator in the planning process for periods beyond the present one year outreach as well as recommendations in the IERP. The re-write should not be construed as relieving the Reliability Coordinator of responsibilities in this area but simply as a reflection of how the process actually starts.

Recommend acronyms, e.g. SDT, be defined the first time they are used in the document.

Recommend outdated and inaccurate language in the Technical Rationale be considered for deletion. For example, paragraph 2 under “Rationale for R4” states:

“In the future, the SDT believes that such coordination should take place in the TPL standards and to support that position, the SDT has created an item in a draft SAR for TPL-001 - 4 that would revise Requirement R8 to make the Reliability Coordinator an explicit party in the re view process described there.”

As TPL-001-4 is now in force and as the Reliability Coordinator function is not explicitly mentioned anywhere in TPL-001-4, Requirement R8 or otherwise, recommend this text be stricken from the Technical Rationale for IRO-017.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name**Comment**

EEI supports the removal of the GTB from IRO-017-1. EEI also recommends adding the following information to the Technical Rationale being developed:

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

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

On behalf of Exelon, Segments: 1, 3, 5, 6

Exelon supports the removal of the GTB from IRO-017-1.

As suggested by EEI, Exelon also recommends adding the following information to the Technical Rationale being developed:

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

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Duke Energy does not have comments.

VACAR South comments follow:

- Refer to comments in question #1.
- All language from the GTB section in the standard should be transitioned to the new (separate) Technical Rationale document as recommended in comment (b) listed in question #1.

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL

Answer Yes

Document Name

Comment

Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Breene - WEC Energy Group, Inc. - 3,4,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jamie Johnson - California ISO - 2

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE noticed the reason for development of the standard was not included in the new Technical Rationale document.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

9. IRO-018-1(j): Do you agree with the recommendation to transition the GTB section of this standard to a separate Technical Rationale document? If no, please provide the basis for your disagreement.

Marty Hostler - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

NO. See response to Question 1.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer No

Document Name

Comment

2-7 See Response to Question 1.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

We see no value in the GTB section, and are not sure how a separate Technical Rationale document would be used during enforcement. The GTB seems relevant only when the initial standard is up for approval.

Likes 0

Dislikes 0

Response

Kjersti Drott - Tri-State G and T Association, Inc. - 1,3,5

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer No

Document Name

Comment

ATC supports the comments of EEI.

Likes 0

Dislikes 0

Response

Michael Courchesne - Michael Courchesne On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Michael Courchesne

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Reclamation recommends the GTB sections be contained in the same document as the standard. All documentation and guidance pertaining to each standard should be contained in the same document as the standard to facilitate ease of reference.

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer No

Document Name

Comment

BHE believes, in the interest of simplicity, leave the GTB attached with the NERC Standard as a point of reference when trying to understand the applicability and rationale behind some of the requirements. GTB section stays with the Standard so that if any white paper is produced the edits stay with the Standard. This way we do not have to look in a different location for any edits that are pertinent to Standard. "One stop shopping."

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL

Answer No

Document Name

Comment

Westar Energy and Kansas City Power & Light support Edison Electric Institute's response.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Instead of creating a new and separate "Technical Rationale" document, we suggest that the version history table simply point back to the project that generated these notations. For IRO-018-1(i), the version history "action" could read: "The 'Supplemental Material / Guidelines and Technical Basis' section of the standard was removed. The information removed is available in the final draft version of IRO-018-1 (Project 2009-02). Because no changes were made to the mandatory and enforceable elements of the standard, the version number remains unchanged."

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

No

Document Name

Comment**On behalf of Exelon, Segments: 1, 3, 5, 6**

Exelon does not support the incomplete transfer of the Guidelines and Technical Basis for IRO-018-1 (i) because the portion of the GTB that describes Real-time Monitoring, or monitoring of the Bulk Electric System (BES) was removed from the standard but not transferred to the Technical Rationale. It is Exelon's understanding that only those Reliability Standards where their GTB could be moved to the Technical Rationale, without modification would be part of the initial phase of this project. However, if the deleted section was removed by mistake and the SDT adds that language to the Technical Rationale, we would be supportive of this change.

In addition to above referenced concerns, as suggested by EEI, Exelon also recommends that the following be added to the Technical Rationale for IRO-018-1(i).

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

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

EEI does not support the incomplete transfer of the Guidelines and Technical Basis for IRO-018-1 (i) because the portion of the GTB that describes Real-time Monitoring, or monitoring of the Bulk Electric System (BES) was removed from the standard but not transferred to the Technical Rationale. It is EEI's understanding that only those Reliability Standards where their GTB could be moved to the Technical Rationale, without modification, would be part of the initial phase of this project. However, if the deleted section was removed by mistake and the SDT adds that language to the Technical Rationale, we would be supportive of this change.

In addition to above referenced concerns, we also suggest that the following be added to the Technical Rationale for IRO-018-1(i).

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

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Unlike the other IRO standards Technical Rationale proposals, the items proposed to be included in the Technical Rationale for this IRO-018-1(i) seem to be fraught with compliance examples and clarifications. For example:

Requirement R1: The Operating Process or Operating Procedure must include provisions for indicating the quality of Real-time data to operating personnel. Descriptions of quality indicators such as display color codes, data quality flags, or other such indicators as found in Real-time monitoring specifications could be used.

Rationale for Requirement R1: The Operating Process or Operating Procedure must include provisions for indicating the quality of Real-time data to operating personnel. Descriptions of quality indicators such as display color codes, data quality flags, or other such indicators as found in Real-time monitoring specifications could be used.

All of the proposed items for Technical Rationale for IRO-018-1(i) may be more appropriately moved into compliance guidance.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Duke Energy does not have comments.

VACAR South comments follow:

- a) Refer to comments in question #1.
- b) All language from the GTB section in the standard should be transitioned to the separate Technical Rationale document as recommended in comment (b) listed in question #1. The first paragraph and the four associated bullets from the GTB section in the standard, that begins with *“Real-time monitoring, or monitoring the Bulk Electric System (BES) in Real-time,.....”* was not included in the separate Technical Rationale document for IRO-018-1(i).
- c) Additionally, VACS requests the GTB Review Team to include references to the Compliance Guidance document(s) or other references, to the new (separate) Technical Rationale document as recommended in the comments (c. and c.i.) listed in question #1. For IRO-018-1(i), the Proposed Implementation Guidance document listed below, that should soon be endorsed by the ERO, is applicable.

i. TOP-010-1(i) and IRO-018-1(i) RTA Quality (OC)

d) "Real-Time" in the title of the new (separate) Technical Rationale document needs to be modified to "Real-time".

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Breene - WEC Energy Group, Inc. - 3,4,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer

Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE inquires as to why the first section of the Guidelines and Technical Basis regarding Real-time monitoring was not included in the new Technical Rationale document.	
Likes 0	
Dislikes 0	
Response	
Jamie Johnson - California ISO - 2	
Answer	
Document Name	
Comment	
CAISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee.	
Likes 0	
Dislikes 0	
Response	