

Regional Reliability Standards Working Group

February 23, 2007 — 10 a.m.–1 p.m. Eastern Time

WebEx and Conference Call

☎ Consortium conference server at phone number 1(732)694-2061
 Conference code is 1160022307
 WebEx Meeting number: 711 706 576
 WebEx Meeting password: standards

Agenda

1. Administrative Items

a. Introductions/Attendance

Patrick Huntley — SERC Reliability Corporation
 Robert (Bob) Millard — ReliabilityFirst Corporation
 Steven Myers — Electric Reliability Council of Texas, Inc.
 Farzaneh Tafreshi — Electric Reliability Council of Texas, Inc.
 Mak Nagle — Southwest Power Pool
 John E. Odom — Florida Reliability Coordinating Council
 Kenneth Wilson — Western Electricity Coordinating Council
 Guy V. Zito — Northeast Power Coordinating Council, Inc.
 Larry Brusseau — Midwest Reliability Organization
 David Taylor — North American Electric Reliability Corporation

b. Meeting Notes

The group will select a “volunteer” to take the notes for the meeting.

2. Review of Action Items from Last Meeting

David Taylor will review the action item list developed at the January 23–24, 2007 RRSWG meeting with the group:

Action Items	Status:	Assigned To:
<ul style="list-style-type: none"> Discuss the regions’ UFLS programs at the UFLS standards drafting team meeting. 	Overviews of each region’s UFLS program are to be provided at the initial meeting of the standard drafting team for Project	RRSWG

	2007-01	
<ul style="list-style-type: none"> RRSWG members will send Dave 2007 regional standards committee schedule 		RRSWG
<ul style="list-style-type: none"> Dave is to develop and distribute draft SARs for comment for 2007-05 (Balancing Authority BAL-002) and 2007-11 (Disturbance Monitoring PRC-002/PRC-018). These SARs need to be submitted to the Standards Committee in March. 	<p>SAR for Project 2007-11 was issued for comment on Jan 31 and presented to SC on Feb 9</p> <p>SAR for Project 2007-05 is under development</p>	Dave, Bob, Kenneth
<ul style="list-style-type: none"> NERC Regional Reliability Standards Evaluation Procedure - Dave is to correct bullet number 1 under step 2 to match the form. 		Dave
<ul style="list-style-type: none"> Dave will draft and send a letter to the regions requesting that the regional reliability standards numbering convention be adopted. 	E-mail with proposed regional standard numbering convention issued for review on Feb 7. Discussion to be held at Feb 23 RRSWG meeting	Dave
<ul style="list-style-type: none"> Kenneth is to bring a projector to the March meeting in Long Beach, CA 		Kenneth
<ul style="list-style-type: none"> Draft a RRSWG scope statement for the next meeting. 		Pat
<ul style="list-style-type: none"> RRSWG member to provide Dave with list of regional standards to be tracked on the NERC regional standards development web page 		RRSWG

3. RRSWG Scope

At the January 23–24 RRSWG meeting, the group discussed the future activities of the RRSWG. Pat Huntley volunteered to draft a new scope for the RRSWG and will discuss his proposal.

4. WECC Regional Standards Request

On December 22, 2006, WECC submitted a request to NERC to approve eight WECC regional standards. On January 10, 2007, NERC posted for public comment the eight proposed WECC standards. David Taylor will provide an update to the group as to the status of WECC’s request.

5. Regional Standard Numbering System

At the January 24 RRSWG meeting, the group discussed a numbering convention for regional standards. On February 7, 2007, the proposed numbering convention (see **Attachments 5**) was issued to the regions for review. The group will discuss the pros and cons of the convention with the goal of agreeing on a numbering convention to be used for all regional standards.

6. Disturbance Monitoring SAR and Regional Standards

At the January 23–24 RRSWG meeting, the group discussed drafting the SAR for Project 2007-11, Disturbance Monitoring. David Taylor will be the NERC coordinator for Project 2007-11 and will provide the group with an update as to the status of the SAR for Project 2007-11 (see **Attachments 6a-6b**).

7. Underfrequency Load Shedding SAR and Regional Standard

David Taylor will update the group on the status of Project 2007-01, underfrequency load shedding.

8. NERC Regional Reliability Standards Web Page

David Taylor will review recent updates of NERC’s regional reliability Web page with the group.

9. Review of Action Items

David Taylor will review the list of outstanding action items and action items generated during the meeting and confirm assignments:

Action Items	Status:	Assigned To:
<ul style="list-style-type: none"> Discuss the regions’ UFLS programs at the UFLS standards drafting team meeting. 	Overviews of each region’s UFLS program are to be provided at the initial meeting of the standard drafting team for Project 2007-01	RRSWG
<ul style="list-style-type: none"> RRSWG members will send Dave 2007 regional standards committee schedule 		RRSWG
<ul style="list-style-type: none"> Dave is to develop and distribute draft SARs for comment for 2007-05 (Balancing Authority BAL-002) and 2007-11 (Disturbance Monitoring PRC-002/PRC-018). These SARs need to be submitted to the Standards Committee in March. 	<p>SAR for Project 2007-11 was issued for comment on Jan 31 and presented to SC on Feb 9</p> <p>SAR for Project 2007-05 is under development</p>	Dave, Bob, Kenneth
<ul style="list-style-type: none"> NERC Regional Reliability Standards Evaluation Procedure - Dave is to correct bullet number 1 under step 2 to match the form. 		Dave
<ul style="list-style-type: none"> Kenneth is to bring a projector to the March meeting in Long Beach, CA 		Kenneth
<ul style="list-style-type: none"> Draft a RRSWG scope statement for the next meeting. 		Pat
<ul style="list-style-type: none"> RRSWG member to provide Dave with list of regional standards to be tracked on the NERC regional standards development web page 		RRSWG
<ul style="list-style-type: none"> 		
<ul style="list-style-type: none"> 		
<ul style="list-style-type: none"> 		

10. Next Steps

The group will discuss and identify the next steps and establish future meeting dates and locations.

Next meetings:

- March 19–20, 2007 in Long Beach, CA (prior to the PC/OC meetings)
 - 2–5 p.m. on March 19th
 - 8 a.m.–4 p.m. on March 20th
- April WebEx — **select date**

Future meeting sites:

- May — SPP offices (Little Rock)?? — **confirm and select date**
- June WebEx — **select date**
- July — WECC offices (Salt Lake City)??
- August WebEx — **select date**
- September — RFC offices (Fairlawn)??
- October WebEx — **select date**
- November — ???
- December WebEx — **select date**

Draft - February 7, 2007**Numbering Convention for NERC Regional Reliability Standards
February 7, 2007**

Since regional standards, once approved by FERC, become part and body of the NERC reliability standards – all of which require a unique number - a numbering convention consistent with the NERC reliability standard numbering convention is required for all regional standards developed. The regional reliability standard numbering convention is:

LLL–RRRRR–NNN–VV

Where:

- LLL is a three-letter acronym denoting the general topical area of the standard (new acronyms may be added if additional broad areas are introduced in the future):
 - BAL Resource and Demand Balancing
 - CIP Critical Infrastructure Protection
 - COM Communications
 - EOP Emergency Preparedness and Operations
 - FAC Facilities Design, Connections and Maintenance
 - INT Interchange Scheduling and Coordination
 - IRO Interconnection Reliability Operations and Coordination
 - MOD Modeling, Data, and Analysis
 - ORG Organization Certification
 - PER Personnel Performance, Training, and Qualifications
 - PRC Protection and Control
 - TOP Transmission Operations
 - TPL Transmission Planning
 - VAR Voltage and Reactive

- RRRRR is a three- to five-letter acronym denoting the region to which the standard is applicable:
 - ERCOT Electric Reliability Council of Texas
 - FRCC Florida Reliability Coordinating Council
 - MRO Midwest Reliability Organization
 - NPCC Northeast Power Coordinating Council
 - RFC ReliabilityFirst Corporation
 - SERC SERC Reliability Corporation
 - SPP Southwest Power Pool
 - WECC Western Electricity Coordinating Council

- NNN is a three-digit standard number within that topical area:
 - If there is an existing NERC reliability standard that is a companion to the regional standard, the NERC three-digit number will be used
 - If there is not an existing NERC companion reliability standard, the number will be 5NN (beginning with 501 and increasing sequentially)

Draft - February 7, 2007

- VV is the two-digit version number of that regional reliability standard beginning with 01 and increasing sequentially.

For example:

- **BAL-ERCOT-002-02** would be ERCOT's second revision to a regional standard which is companion to NERC's reliability standard BAL-002-0 (Disturbance Control Performance)
- **TOP-WECC-501-01** would be a regional standard unique to WECC in the Transmission Operations topical area of standards

Standard Authorization Request Form

Title of Proposed Standard	Disturbance Monitoring (Project 2007-11)
Request Date	February 7, 2007

SAR Requestor Information	SAR Type <i>(Check a box for each one that applies.)</i>
Name Regional Reliability Standards Working Group	<input type="checkbox"/> New Standard
Primary Contact Robert W. Millard Director of Standards ReliabilityFirst Corporation	<input checked="" type="checkbox"/> Revision to existing Standards – PRC-002 and PRC-018
Telephone (630) 261-2621 Fax (630) 691-4222	<input type="checkbox"/> Withdrawal of existing Standard
E-mail bob.millard@rfirst.org	<input type="checkbox"/> Urgent Action

Purpose

To establish requirements for installation of Disturbance Monitoring Equipment (DME) and reporting of disturbance data to facilitate analyses of events and verify system models.

PRC-002 — Define and Document Disturbance Monitoring Equipment Requirements

PRC-018 — Disturbance Monitoring Equipment Installation and Data

PRC-002 was a Version 0 standard that was modified solely to add Phase III & IV planning Measures; PRC-018 is a new standard developed as a translation of Phase III & IV measures. As the electric reliability organization begins enforcing compliance with reliability standards under Section 215 of the Federal Power Act in the United States and applicable statutes and regulations in Canada and Mexico, the industry needs a set of clear, measurable, and enforceable reliability standards. The Version 0 standards and the translation of Phase III & IV planning measures, while a good foundation, were translated from historical operating and planning policies and guides that were appropriate in an era of voluntary compliance. The Version 0 standards, Phase III & IV standards, and recent updates were put in place as a temporary starting point to start-up the electric reliability organization and begin enforcement of mandatory standards. However, it is important to update the standards in a timely manner, incorporating improvements to make the standards more suitable for enforcement and to capture prior recommendations that were deferred during the Version 0 and Phase III & IV translations.

Industry Need

1. Provide an adequate level of reliability for the North American bulk power systems — the standards are complete and the requirements are set at an appropriate level to ensure reliability.
2. Ensure they are enforceable as mandatory reliability standards with financial penalties — the applicability to bulk power system owners, operators, and users, and as appropriate particular classes of facilities, is clearly defined; the purpose, requirements, and measures are results-focused and unambiguous; the consequences of violating the requirements are clear.
3. Consider comments received during the initial development of this set of standards and other comments received from ERO regulatory authorities and stakeholders (Attachment 1)
4. Bring the standards into conformance with the latest version of the Reliability Standards Development Procedure and the ERO Rules of Procedure. (Attachment 2)
5. Satisfy the standards procedure requirement for five-year review of the standards.

Brief Description

PRC-002 and PRC-018 are new standards that were approved in 2006. In 2007, the standards staff will collect feedback on the strengths and weaknesses of this set of standards from the Operating and Planning Committees and from compliance personnel. The data collected will be used by the drafting team to improve and clearly identify the requirements of these standards.

PRC-002 is one of four reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard. The standard drafting team (SDT) will review PRC-002 and each of the current regional programs developed in accordance with that standard, including any other associated programs and/or requirements related to and contained with the disturbance monitoring program documentation. The SDT shall determine which requirements should be continent-wide requirements and which requirements should be included in regional standards.

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

Reliability Functions

The Standard will Apply to the Following Functions <i>(Check box for each one that applies.)</i>		
<input type="checkbox"/>	Reliability Coordinator	The entity that is the highest level of authority who is responsible for the reliable operation of the Bulk Electric System, has the Wide Area view of the Bulk Electric System, and has the operating tools, processes and procedures, including the authority to prevent or mitigate emergency operating situations in both next-day analysis and real-time operations. The Reliability Coordinator has the purview that is broad enough to enable the calculation of Interconnection Reliability Operating Limits, which may be based on the operating parameters of transmission systems beyond any Transmission Operator's vision.
<input type="checkbox"/>	Balancing Authority	Integrates resource plans ahead of time, and maintains load-interchange-resource balance within its metered boundary and supports system frequency in real time.
<input type="checkbox"/>	Interchange Authority	Authorizes valid and balanced Interchange Schedules.
<input type="checkbox"/>	Planning Authority	Plans the Bulk Electric System.
<input type="checkbox"/>	Resource Planner	Develops a long-term (>one year) plan for the resource adequacy of specific loads within a Planning Authority area.
<input type="checkbox"/>	Transmission Planner	Develops a long-term (>one year) plan for the reliability of transmission systems within its portion of the Planning Authority area.
<input type="checkbox"/>	Transmission Service Provider	Provides transmission services to qualified market participants under applicable transmission service agreements
<input checked="" type="checkbox"/>	Transmission Owner	Owns transmission facilities.
<input checked="" type="checkbox"/>	Transmission Operator	Operates and maintains the transmission facilities, and executes switching orders.
<input type="checkbox"/>	Distribution Provider	Provides and operates the "wires" between the transmission system and the customer.
<input checked="" type="checkbox"/>	Generator Owner	Owns and maintains generation unit(s).
<input checked="" type="checkbox"/>	Generator Operator	Operates generation unit(s) and performs the functions of supplying energy and Interconnected Operations Services.
<input type="checkbox"/>	Purchasing-Selling Entity	The function of purchasing or selling energy, capacity, and all necessary Interconnected Operations Services as required.

Standards Authorization Request Form

<input type="checkbox"/>	Market Operator	Integrates energy, capacity, balancing, and transmission resources to achieve an economic, reliability-constrained dispatch.
<input type="checkbox"/>	Load-Serving Entity	Secures energy and transmission (and related generation services) to serve the end user.

Reliability and Market Interface Principles

Applicable Reliability Principles <i>(Check box for all that apply.)</i>	
<input checked="" type="checkbox"/>	1. Interconnected bulk electric systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input checked="" type="checkbox"/>	2. The frequency and voltage of interconnected bulk electric systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input checked="" type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk electric systems shall be made available to those entities responsible for planning and operating the systems reliably.
<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk electric systems shall be developed, coordinated, maintained and implemented.
<input type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk electric systems.
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk electric systems shall be assessed, monitored and maintained on a wide area basis.
Does the proposed Standard comply with all of the following Market Interface Principles? <i>(Select 'yes' or 'no' from the drop-down box.)</i>	
1. The planning and operation of bulk electric systems shall recognize that reliability is an essential requirement of a robust North American economy. Yes	
2. An Organization Standard shall not give any market participant an unfair competitive advantage. Yes	
3. An Organization Standard shall neither mandate nor prohibit any specific market structure. Yes	
4. An Organization Standard shall not preclude market solutions to achieving compliance with that Standard. Yes	
5. An Organization Standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. Yes	

Related Standards – Listed under description

Standard No.	Explanation

Related SARs

SAR ID	Explanation

Regional Differences

Region	Explanation
ERCOT	
FRCC	
MRO	
NPCC	
SERC	
RFC	
SPP	
WECC	

The drafting team will assist stakeholders in considering these comments in determining what changes to make to the standards:

PRC-002 Define and Document Disturbance Monitoring Equipment Requirements

FERC NOPR

- o Commission will not propose to accept or remand this Reliability Standard until the ERO submits additional information.

FERC Staff Report

- o Only general issues
- o Blackout items not addressed

V0 Industry Comments

- o More specificity in equipment requirements needed
- o IDWG identified deficiencies
- o Digital inputs and load need to be added

Phase III/IV comments

- o There is no criteria that the RROs must use in specifying the process for identifying locations where DMEs are required

Violation Risk Factor Drafting Team Comments

- o R1 - This standard and all related sub requirements are after the fact data analysis.

Regional Fill-in-the-Blank Team Comments

- o Determine what elements (if any) should be included in the North American standard and what elements should be included in the regional standards.
- o Development of regional standards needs to be coordinated with regional entities.
- o Regional entities should be notified to begin process for developing regional standards once the standard drafting team has determined what elements should be included in the continent-wide standard and what elements should be included in the regional standards.

PRC-018 Disturbance Monitoring Equipment Installation and Data

FERC NOPR

- o No changes identified.

Violation Risk Factor Drafting Team Comments

- o R3.4, 3.5, 3.6, 3.7 – Ambiguous

The drafting team will reference these guidelines in determining what changes to make to the standards to bring them into conformance with the *Reliability Standards Development Procedure Manual, Version 6* and the *ERO Rules of Procedure*:

Standard Review Guidelines

Applicability

Does this reliability standard clearly identify the functional classes of entities responsible for complying with the reliability standard, with any specific additions or exceptions noted? Where multiple functional classes are identified is there a clear line of responsibility for each requirement identifying the functional class and entity to be held accountable for compliance? Does the requirement allow overlapping responsibilities between Registered Entities possibly creating confusion for who is ultimately accountable for compliance?

Does this reliability standard identify the geographic applicability of the standard, such as the entire North American bulk power system, an interconnection, or within a regional entity area? If no geographic limitations are identified, the default is that the standard applies throughout North America.

Does this reliability standard identify any limitations on the applicability of the standard based on electric facility characteristics, such as generators with a nameplate rating of 20 MW or greater, or transmission facilities energized at 200 kV or greater or some other criteria? If no functional entity limitations are identified, the default is that the standard applies to all identified functional entities.

Purpose

Does this reliability standard have a clear statement of purpose that describes how the standard contributes to the reliability of the bulk power system? Each purpose statement should include a value statement.

Performance Requirements

Does this reliability standard state one or more performance requirements, which if achieved by the applicable entities, will provide for a reliable bulk power system, consistent with good utility practices and the public interest?

Does each requirement identify who shall do what under what conditions and to what outcome?

Measurability

Is each performance requirement stated so as to be objectively measurable by a third party with knowledge or expertise in the area addressed by that requirement?

Does each performance requirement have one or more associated measures used to objectively evaluate compliance with the requirement?

If performance results can be practically measured quantitatively, are metrics provided within the requirement to indicate satisfactory performance?

Technical Basis in Engineering and Operations

Is this reliability standard based upon sound engineering and operating judgment, analysis, or experience, as determined by expert practitioners in that particular field?

Completeness

Is this reliability standard complete and self-contained? Does the standard depend on external information to determine the required level of performance?

Consequences for Noncompliance

In combination with guidelines for penalties and sanctions, as well as other ERO and regional entity compliance documents, are the consequences of violating a standard clearly known to the responsible entities?

Clear Language

Is the reliability standard stated using clear and unambiguous language? Can responsible entities, using reasonable judgment and in keeping with good utility practices, arrive at a consistent interpretation of the required performance?

Practicality

Does this reliability standard establish requirements that can be practically implemented by the assigned responsible entities within the specified effective date and thereafter?

Capability Requirements versus Performance Requirements

In general, requirements for entities to have ‘capabilities’ (this would include facilities for communication, agreements with other entities, etc.) should be located in the standards for certification. The certification requirements should indicate that entities have a responsibility to ‘maintain’ their capabilities.

Consistent Terminology

To the extent possible, does this reliability standard use a set of standard terms and definitions that are approved through the NERC reliability standards development process?

If the standard uses terms that are included in the NERC Glossary of Terms Used in Reliability Standards, then the term must be capitalized when it is used in the standard. New terms should not be added unless they have a ‘unique’ definition when used in a NERC reliability standard. Common terms that could be found in a college dictionary should not be defined and added to the NERC Glossary.

Are the verbs on the ‘verb list’ from the DT Guidelines? If not – do new verbs need to be added to the guidelines or could you use one of the verbs from the verb list?

Violation Risk Factors (Risk Factor)

High Risk Requirement

A requirement that, if violated, could directly cause or contribute to bulk electric system instability, separation, or a cascading sequence of failures, or could place the bulk electric system at an unacceptable risk of instability, separation, or cascading failures;

or a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to bulk electric system instability, separation, or a cascading sequence of failures, or could place the bulk electric system at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition.

Medium Risk Requirement

A requirement that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures;

or a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or

restore the bulk electric system. However, violation of a medium risk requirement is unlikely, under emergency, abnormal, or restoration conditions anticipated by the preparations, to lead to bulk electric system instability, separation, or cascading failures, nor to hinder restoration to a normal condition.

Lower Risk Requirement

A requirement that, if violated, would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. A requirement that is administrative in nature;

or a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. A planning requirement that is administrative in nature.

Mitigation Time Horizon

The drafting team should also indicate the time horizon available for mitigating a violation to the requirement using the following definitions:

- **Long-term Planning** — a planning horizon of one year or longer.
- **Operations Planning** — operating and resource plans from day-ahead up to and including seasonal.
- **Same-day Operations** — routine actions required within the timeframe of a day, but not real-time.
- **Real-time Operations** — actions required within one hour or less to preserve the reliability of the bulk electric system.
- **Operations Assessment** — follow-up evaluations and reporting of real time operations.

Violation Severity Levels

The drafting team should indicate a set of violation severity levels that can be applied for the requirements within a standard. (‘Violation severity levels’ replace existing ‘levels of non-compliance.’) The violation severity levels may be applied for each requirement or combined to cover multiple requirements, as long as it is clear which requirements are included.

The violation severity levels should be based on the following definitions:

- **Lower: mostly compliant with minor exceptions** — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: 95% to 99% compliant.
- **Moderate: mostly compliant with significant exceptions** — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: 85% to 94% compliant.
- **High: marginal performance or results** — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: 70% to 84% compliant.
- **Severe: poor performance or results** — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: less than 70% compliant.

Compliance Monitor

Replace, ‘Regional Reliability Organization’ with ‘Electric Reliability Organization’

Fill-in-the-blank Requirements

Do not include any ‘fill-in-the-blank’ requirements. These are requirements that assign one entity responsibility for developing some performance measures without requiring that the performance measures be included in the body of a standard – then require another entity to comply with those requirements.

Every reliability objective can be met, at least at a threshold level, by a North American standard. If we need regions to develop regional standards, such as in under-frequency load shedding, we can always write a uniform North American standard for the applicable functional entities as a means of encouraging development of the regional standards.

Requirements for Regional Reliability Organization

Do not write any requirements for the Regional Reliability Organization. Any requirements currently assigned to the RRO should be re-assigned to the applicable functional entity.

Effective Dates

Must be 1st day of 1st quarter after entities are expected to be compliant – must include time to file with regulatory authorities and provide notice to responsible entities of the obligation to comply. If the standard is to be actively monitored, time for the Compliance Monitoring and Enforcement Program to develop reporting instructions and modify the Compliance Data Management System(s) both at NERC and Regional Entities must be provided in the implementation plan.

Associated Documents

If there are standards that are referenced within a standard, list the full name and number of the standard under the section called, ‘Associated Documents’.

Functional Model Version 3

Review the requirements against the latest descriptions of the responsibilities and tasks assigned to functional entities as provided in pages 13 through 53 of the draft Functional Model Version 3.

Comment Form — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

Please use this form to submit comments on the proposed SAR for disturbance monitoring. Comments must be submitted by **[Date]**. You may submit the completed form by e-mail to sarcomm@nerc.com with the abbreviation "DME SAR" in the subject line. If you have questions please contact **David Taylor** at David.Taylor@nerc.net or by telephone at 609-452-8060.

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

Comment Form — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

Background Information

This project involves revising the requirements in the following four standards:

- PRC-002 — Define and Document Disturbance Monitoring Equipment Requirements
- PRC-018 — Disturbance Monitoring Equipment Installation and Data Reporting

PRC-002 was a Version 0 standard that was modified solely to add Phase III & IV planning Measures; PRC-018 is a new standard developed as a translation of Phase III & IV measures. As the electric reliability organization begins enforcing compliance with reliability standards under Section 215 of the Federal Power Act in the United States and applicable statutes and regulations in Canada and Mexico, the industry needs a set of clear, measurable, and enforceable reliability standards. The Version 0 standards and the translation of Phase III & IV planning measures, while a good foundation, were translated from historical operating and planning policies and guides that were appropriate in an era of voluntary compliance. However, it is important to update the standards in a timely manner, incorporating improvements to make the standards more suitable for enforcement and to capture prior recommendations that were deferred during the Version 0 translation.

PRC-002 and PRC-018 are new standards that were approved in 2006. In conjunction with this project the standard drafting team will collect feedback on the strengths and weaknesses of this set of standards from the Operating and Planning Committees and from compliance personnel. The data collected will be used to modify these standards.

PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The standard drafting team will work with stakeholders to review PRC-002 and each of the current regional disturbance monitoring equipment requirements to determine which requirements should be continent-wide requirements and which requirements should be included in regional standards.

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

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

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

1. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 -- disturbance monitoring?

- Yes
- No

**Comment Form — 1st Draft of SAR for Disturbance Monitoring
Project 2007-11**

If "No," please explain why in the comment area below and provide supporting information. Comments:

- 2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?**

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

- 3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?**

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments: