

Consideration of Comments on the Regional Reliability Standard Planning Resource Adequacy Analysis, Assessment and Documentation PRC-002-RFC-01

The Regional Reliability Standards Working Group thanks all commenters who submitted comments on the proposed Regional Reliability Standard Planning Resource Adequacy Analysis, Assessment and Documentation PRC-002-RFC-01. The standard was posted for a 45-day public comment period from May 14, 2009 through July 13, 2009. The stakeholders were asked to provide feedback on the standard through a special Electronic Comment Form. There were 3 sets of comments, including comments from 3 different people from 3 companies representing 4 of the 10 Industry Segments as shown in the table on the following pages.

http://www.nerc.com/filez/regional_standards/regional_reliability_standards_under_development.html

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

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

Index to Questions, Comments, and Responses

1. Was the proposed standard developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?	4
2. Does the proposed standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?.....	5
3. Does the proposed standard pose a serious and substantial threat to public health, safety, welfare, or national security?	6
4. Does the proposed standard pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?	7
5. Does the proposed regional reliability standard meet at least one of the following criteria?	8

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The Industry Segments are:

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

		Commenter	Organization	Industry Segment										
				1	2	3	4	5	6	7	8	9	10	
1.	Individual	James H. Sorrels, Jr.	American Electric Power	X		X		X	X					
2.	Individual	Laura Lee	Duke Energy	X		X		X	X					
3.	Individual	Michael Ayotte	ITC Holdings	X										

1. Was the proposed standard developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?

Summary Consideration: The commenters supported this Regional Reliability Standard.

Organization	Yes or No	Question 1 Comment
American Electric Power	Yes	There was a very good demonstration of checks and balances on this standard by the RFC Board. Remanding the standard back to the SDT facilitated greater consideration of stakeholder input, greater consensus through additional standard modifications, and a much better standard, that received significantly greater affirmation in the ballot.
Response: Thank you for your support.		
Duke Energy	Yes	
ITC Holdings	Yes	None

2. Does the proposed standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?

Summary Consideration: No adverse impacts were noted by commenters.

Organization	Yes or No	Question 2 Comment
American Electric Power	No	
Duke Energy	No	
ITC Holdings	No	None

3. Does the proposed standard pose a serious and substantial threat to public health, safety, welfare, or national security?

Summary Consideration: No threats were noted by commenters.

Organization	Yes or No	Question 3 Comment
American Electric Power	No	
Duke Energy	No	
ITC Holdings	No	None

4. Does the proposed standard pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?

Summary Consideration: No burdens were noted by the commenters.

Organization	Yes or No	Question 4 Comment
American Electric Power	No	
Duke Energy	No	
ITC Holdings	No	None

5. Does the proposed regional reliability standard meet at least one of the following criteria?

- The proposed standard has more specific criteria for the same requirements covered in a continent-wide standard
- The proposed standard has requirements that are not included in the corresponding continent-wide reliability standard
- The proposed regional difference is necessitated by a physical difference in the bulk power system.

Summary Consideration: The only commenter noted that this proposed regional reliability standard satisfies the criteria that it is more demanding than the continent-wide standard.

Organization	Yes or No	Question 5 Comment
American Electric Power	Yes	
Duke Energy	Yes	The proposed standard has more specific criteria for the same requirements covered in a continent-wide standard.
Response: Thank you for your support.		
ITC Holdings	Yes	None