

## Consideration of Comments

### SERC Regional Reliability Standards Development Procedure

The Regional Standards Group thanks all commenters who submitted comments on the proposed revisions to the SERC RRSD Procedure. These standards were posted for a 45-day public comment period from October 4, 2011 through November 18, 2011. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form. There were 4 sets of comments, including comments from more than 15 different people from approximately 5 companies representing 6 of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's project page:

[http://www.nerc.com/filez/regional\\_standards/regional\\_reliability\\_standards\\_under\\_development.html](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 of Standards and Training, Herb Schrayshuen, at 404-446-2560 or at [herb.schrayshuen@nerc.net](mailto:herb.schrayshuen@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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

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**The Industry Segments are:**

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

Group/Individual		Commenter	Organization	Registered Ballot Body Segment										
				1	2	3	4	5	6	7	8	9	10	
1.	Group	Connie Lowe	Dominion	X		X		X	X					
<b>Additional Member Additional Organization Region Segment Selection</b>														
1.	Mike Garton		NPCC	5										
2.	Michael Gildea		MRO	5										
3.	Louis Slade		SERC	1, 3, 6										
2.	Group	Gerald Beckerle	SERC OC Standards Review Group	X		X								
<b>Additional Member Additional Organization Region Segment Selection</b>														
1.	Bob Dalrymple	TVA	SERC	1, 3, 5, 6										
2.	Jim Case	Entergy	SERC	1, 3, 6										
3.	Joe Finnegan	Dominion VP	SERC	1, 3, 5, 6										
4.	John Troha	SERC Reliability Corp	SERC	10										

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
3.	Individual	Pat Huntley on behalf of the SERC legal department	SERC Reliability Corp.										X
4.	Individual	Chris Higgins / Dean Bender / Mary Willey / John Anasis / Greg Vassallo / Carol Larvick / Charles Sheppard	Bonneville Power Administration	X	X	X		X	X				

1. Do you agree the revised SERC Regional Reliability Standards Development Procedure continues to meet the “Open” criteria as outlined

**Summary Consideration:**

Organization	Yes or No	Question 1 Comment
Dominion	Yes	
SERC OC Standards Review Group	Yes	
SERC Reliability Corp.		
Bonneville Power Administration		

2. Do you agree the revised SERC Regional Reliability Standards Development Procedure continues to meet the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below.

**Summary Consideration:**

Organization	Yes or No	Question 2 Comment
Dominion	Yes	
SERC OC Standards Review Group	Yes	
SERC Reliability Corp.		
Bonneville Power Administration		

3. Do you agree the revised SERC Regional Reliability Standards Development Procedure continues to meet the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below.

**Summary Consideration:**

Organization	Yes or No	Question 3 Comment
Dominion	Yes	
SERC OC Standards Review Group	Yes	
SERC Reliability Corp.		
Bonneville Power Administration		

4. Do you agree the revised SERC Regional Reliability Standards Development Procedure continues to meet the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below.

**Summary Consideration:**

Organization	Yes or No	Question 4 Comment
Dominion	Yes	
SERC OC Standards Review Group	Yes	
SERC Reliability Corp.		
Bonneville Power Administration		

5. Do you agree the revised SERC Regional Reliability Standards Development Procedure continues to meet the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below.

**Summary Consideration:**

Organization	Yes or No	Question 4 Comment
Dominion	Yes	
SERC OC Standards Review Group	Yes	
SERC Reliability Corp.		
Bonneville Power Administration		

6. If you have any other comments related to the revisions to the SERC Regional Reliability Standards Development Procedure that you have not already provided in response to questions 1-5, please provide them here.

**Summary Consideration:**

Organization	Yes or No	Question 4 Comment
SERC OC Standards Review Group		The SERC OC Standards Review Group endorses the changes made in Draft 3 of Revision 2 to the SERC Regional Standards Development Procedure, which we feel provides consistent uniformity with NERC’s continent-wide reliability standards. The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Standards Review group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers.
Response: Thank you for your comments and your support of the SERC standards process.		
SERC Reliability Corp.		On October 26, 2011, the SERC Board of Directors approved revised Bylaws for SERC. Due to the Board’s action, the following changes have been recommended by SERC’s legal department to conform with the Bylaws revisions.1. The term “SERC area” should be changed to “SERC Region” throughout the document to be consistent with the revised Bylaws. 2. The terms “member” and “members” (when referring to members of SERC) should be changed throughout the document to “Member Company” or “Member Companies” to be consistent with the revised Bylaws. 3. In Appendix A: Stakeholder representation, amend the language in paragraphs A.1 and A.2 to be consistent with the revised Bylaws. An additional change is proposed in Step 10, based on a recommendation received following NERC’s 2009 audit of SERC to make clear that ballots will include provisions for comments and written responses will be prepared for each comment.

Organization	Yes or No	Question 4 Comment
<p>Response:</p> <ol style="list-style-type: none"> <li>1. The drafting team agrees and changed “SERC area” to “SERC Region” throughout the document.</li> <li>2. The drafting team agrees and changed the terms “member” and “members” (when referring to members of SERC) to “Member Company” or “Member Companies” throughout the document.</li> <li>3. The drafting team agrees and changed the language in paragraphs A.1 and A.2 of Appendix A to be consistent with the revised Bylaws.</li> </ol> <p>Additional change: The drafting team agrees and added a requirement in Step 10 to include provisions for comments on the ballot and for the standard drafting team to develop a written response to each ballot comment received.</p>		
<p>Bonneville Power Administration</p>		<p>BPA Thanks you for the opportunity to comment on SERC Regional Reliability Standards Development Procedure. BPA has no comments or concerns at this time.</p>
<p>Response: Thank you for your comments and your support of the SERC standards process.</p>		
<p>Dominion</p>		

END OF REPORT