

Response to Comments to Draft 1 SAR

Modifications to existing Reliability Standards to provide missing measures and compliance elements necessary to include in the Compliance Monitoring Program

Our goal is to give every comment serious consideration in this process. If you feel that your comment has been overlooked or there has been an error or omission in the process, please contact Gerry Cauley immediately at 609-452-8060 or at gerry.cauley@nerc.net. You may submit an appeal in accordance with the [Reliability Standards Appeals Process](#).

Question 1: Do you agree there is a reliability need to address missing and deficient elements in the Version 0 Reliability Standards?

Group Name	Member Names	Answer 16 Yes 0 No	Comments	Response
Entergy	Ed Davis Richard Riley Jay Zimmerman George Bartlett Jim Case Bill Aycock Lynnda Ell Maurice Casadaban	Yes		
FRCC	Eric Senkowicz Linda Campbell	Yes		
Independent Electricity System Operator (IESO), Ontario	Ron Falsetti Khaqan khan	Yes	We agree with the need to prioritize and address missing and deficient compliance elements, measures, and levels of non-compliance from the existing Version 0 Reliability standards. It is our position however, other issues with these standards be addressed in the Version 1 standards being developed.	The CCMC has reviewed the industry comments with regards to the scope of the review and changes to the standards identified in this SAR. The CCMC's original and present expectation of this SAR is that ONLY the measures and compliance criteria of the standard will be reviewed, modified, or developed and added. The standard and its requirements will not be evaluated for technical adequacy. If a requirement as presently written cannot effectively be measured for compliance, the next evolution of standard review and update should address these technical concerns. Any revised standard will go through the full NERC Standards Process.
Individual 1	Kathy Davis – Tennessee Valley Authority	Yes		
Individual 2	John Horakh – MAAC	Yes		

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Individual 3	Ed Stein – FirstEnergy Solutions	Yes	During the Version '0' process no measure or compliance requirements were added to existing standards. Certain standards need to have measure and compliance elements made part of the standard. The existing standards need to be reviewed and amended as necessary to include measures and compliance requirements.	
Individual 4	Ed Riley – California ISO	Yes	We believe that the task should be limited to identifying and prioritizing the missing Measures and Compliance Elements in Version 0. Other modifications to any standard should be developed through the NERC Standards Develop Process.	The CCMC has reviewed the industry comments with regards to the scope of the review and changes to the standards identified in this SAR. The CCMC's original and present expectation of this SAR is that ONLY the measures and compliance criteria of the standard will be reviewed, modified, or developed and added. The standard and its requirements will not be evaluated for technical adequacy. If a requirement as presently written cannot effectively be measured for compliance, the next evolution of standard review and update should address these technical concerns. Any revised standard will go through the full NERC Standards Process.
Individual 5	Kathleen Goodman – ISO NE	Yes	ISO-NE agrees with prioritizing and identifying missing and deficient compliance elements and measures from the existing Version 0 standards, only. Other issues should be addressed in Version 1.	The CCMC has reviewed the industry comments with regards to the scope of the review and changes to the standards identified in this SAR. The CCMC's original and present expectation of this SAR is that ONLY the measures and compliance criteria of the standard will be reviewed, modified, or developed and added. The standard and its requirements will not be evaluated for technical adequacy. If a requirement as presently written cannot effectively be measured for compliance, the next evolution of standard review and update should address these technical concerns. Any revised standard will go through the full NERC Standards Process.
Individual 6	Alan Gale – City of Tallahassee	Yes	If it is important enough to be a standard, there should be compliance elements. If there are no compliance elements necessary, then delete the standard.	The SAR team agrees that each standard needs to be reviewed for missing measures and compliance elements. However, with only a limited amount of time the team elected to use a prioritization approach based on reliability needs. In the future each standard must be evaluated for relevancy of its requirements and then modified to include the appropriate measures and compliance elements.

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Individual 7	Alan Adamson – NYSRC	Yes	The New York State Reliability Council (NYSRC) agrees with prioritizing and identifying missing and deficient compliance elements and measures from the existing Version 0 standards only. Other issues should be addressed in Version 1.	The CCMC has reviewed the industry comments with regards to the scope of the review and changes to the standards identified in this SAR. The CCMC’s original and present expectation of this SAR is that ONLY the measures and compliance criteria of the standard will be reviewed, modified, or developed and added. The standard and its requirements will not be evaluated for technical adequacy. If a requirement as presently written cannot effectively be measured for compliance, the next evolution of standard review and update should address these technical concerns. Any revised standard will go through the full NERC Standards Process.
Individual 8	Joanne Borrell – FirstEnergy Solutions Corp.	Yes	During the Version ‘0’ process no measure or compliance requirements were added to existing standards. Certain standards need to have measure and compliance elements made part of the standard. The existing standards need to be reviewed and amended as necessary to include measures and compliance requirements.	
Individual 9	Roger Champagne – Hydro-Quebec TransEnergie	Yes	Hydro-Québec TransÉnergie (HQTÉ) agree with prioritizing and identifying missing and deficient compliance elements and measures from the existing Version 0 standards. Other issues should be addressed in Version 1.	The CCMC has reviewed the industry comments with regards to the scope of the review and changes to the standards identified in this SAR. The CCMC’s original and present expectation of this SAR is that ONLY the measures and compliance criteria of the standard will be reviewed, modified, or developed and added. The standard and its requirements will not be evaluated for technical adequacy. If a requirement as presently written cannot effectively be measured for compliance, the next evolution of standard review and update should address these technical concerns. Any revised standard will go through the full NERC Standards Process.
Individual 10	Michael C. Calimano – NYISO	Yes	Prioritizing and identifying missing and deficient compliance elements and measures from the existing Version 0 standards, only. Other issues should be addressed in Version 1.	The CCMC has reviewed the industry comments with regards to the scope of the review and changes to the standards identified in this SAR. The CCMC’s original and present expectation of this SAR is that ONLY the measures and compliance criteria of the standard will be reviewed, modified, or developed and added. The standard and its requirements will not be evaluated for technical adequacy. If a requirement as presently written cannot effectively be measured for compliance, the next evolution of standard review and update should address these technical concerns. Any revised standard will go through the full NERC Standards Process.

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Midwest Reliability Organization	Todd Grosnell – OPPD Terry Bilke – MISO Rober Coish – MHEB Dennis Florom – LES Ken Goldsmith – ALT Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional MRO Members	Yes		
NPCC CP9 Reliability Standards Working Group	Ralph Rufrano – NY Power Authority Peter Lebro – National Grid US David Kiguel – Hydro One Networks Kathleen Goodman – ISO NE Alan Adamson – NY State Rel. Council Greg Campoli – NY ISO Khaqan Khan – the IESO (Ontario) David Little – Nova Scotia Power Roger Champagne – TransEnergie Hydro Quebec John Mosier – Northeast Power Coord. Council Guy V. Zito – Northeast Power Coord. Council	Yes	NPCC participating members agree with prioritizing and identifying missing and deficient compliance elements and measures from the existing Version 0 standards only. Other issues should be addressed in Version 1.	The CCMC has reviewed the industry comments with regards to the scope of the review and changes to the standards identified in this SAR. The CCMC’s original and present expectation of this SAR is that ONLY the measures and compliance criteria of the standard will be reviewed, modified, or developed and added. The standard and its requirements will not be evaluated for technical adequacy. If a requirement as presently written cannot effectively be measured for compliance, the next evolution of standard review and update should address these technical concerns. Any revised standard will go through the full NERC Standards Process.
Southern	Marc Butts	Yes	The industry adopted Version 0 standards with some known deficiencies, where	

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Company Transmission	Jim Griffith		the translation of certain previous NERC policies to new standards had to be placed on the back burner. The time has come to incorporate these missing elements into new standards.	
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Question 2: Do you agree with the scope of the proposed modifications?

Group Name	Member Names	Answer 14 Yes 2 No	Comments	Response
Entergy	Ed Davis Richard Riley Jay Zimmerman George Bartlett Jim Case	Yes	<p>We agree with the overall concept of the scope. However the scope itself has several parts, is vague, and is inconsistent and too broad.</p> <p>1) One part of the scope is the annual selection of standards for revision and the process for revising that selection. The overall annual plan as presented is satisfactory. The annual review of which standards will be revised and the submittal of a SAR to change which standards are reviewed for a specific year is a good process.</p> <p>2) A second part of the scope of this SAR is the scope of the work that will be accomplished for each standard during the revision under this SAR. The vagueness stems from the scope of the work on each of the individual standards. The first paragraph of the Detailed Description contains the statement that many existing standards are "missing measures and compliance elements". The next sentence contains the statement that revisions to these standards are needed to complete the missing "elements" defined in the RSPM and to enable inclusion in the Compliance Monitoring Program. Does this second use of the term "elements" include "missing measures and compliance elements", or just "compliance elements"? We suggest it include "missing measures and compliance elements".</p> <p>3) The real scope of work on each individual standard seems to be included in the first statement of the last paragraph: "In all cases, the focus of the revision should be the inclusion of the missing information." We suggest the wording of this scope be changed to:</p> <p>"In all cases, the focus of the revision will be to review and revise measures and compliance elements for relevancy, severity, and consistency."</p>	<p>Yes, we agree that the second use of the term elements is only referring to the missing measures and compliance elements.</p> <p>Agree that review and revising for relevancy, severity and consistency is important, however, not all of the standards identified have measures to review. That is why we are including those standards that are missing measures.</p>

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Electricity System Operator (IESO), Ontario	Khaqan khan		current title tends to allow the Drafting Teams to go beyond the addition of the missing compliance measures and elements. Perhaps even open a full review of the identified Version 0 Standards. The title should therefore be revised to address our concern.	will be limited to ONLY the measures and compliance criteria of the standard.
Individual 1	Kathy Davis – Tennessee Valley Authority	Yes		
Individual 2	John Horakh – MAAC	Yes		
Individual 3	Ed Stein – FirstEnergy Solutions	Yes		
Individual 4	Ed Riley – California ISO	Yes	The scope of the SAR is somewhat unclear. The Title and Purpose/Industry Need sections are clear that the scope is to add missing Measures and Compliance Elements to the Version 0 Reliability Standards. At the end of the Detailed Description section it indicates that existing requirements and measures should also be reviewed. We disagree with reviewing the existing requirements and measures as part of this SAR. Provision for this activity is covered in the NERC Standards Process Manual.	The CCMC has reviewed the industry comments with regards to the scope of the review and changes to the standards identified in this SAR. The CCMC's original and present expectation of this SAR is that ONLY the measures and compliance criteria of the standard will be reviewed, modified, or developed and added. The standard and its requirements will not be evaluated for technical adequacy. If a requirement as presently written cannot effectively be measured for compliance, the next evolution of standard review and update should address these technical concerns. Any revised standard will go through the full NERC Standards Process.
Individual 5	Kathleen Goodman – ISO NE	Yes	ISO-NE agrees with the scope of the SAR; however, the title is misleading. The SAR will allow the Drafting Teams to go beyond the addition of the missing compliance measures and elements and perhaps open a full review of the identified Version 0 Standards. Although this may be the desired outcome and acceptable to industry members, we believe it should be clarified within the posting of this proposed SAR.	The title does reflect the scope of the SAR. The scope will be limited to ONLY the measures and compliance criteria of the standard.
Individual 6	Alan Gale – City of Tallahassee	No	EOP-002-0 Capacity and Energy Emergencies already contains Measures and Compliance elements. Modification of these elements should be a separate SAR since this SAR is to address missing elements only. IRO-001-0 Reliability Coordination - Responsibilities and Authorities already contains Measures and Compliance elements. Modification of these elements should be a separate SAR since this SAR is to address missing elements only. Additionally, Breaking the SAR into multiple SAR's will provide an additional level of flexibility to accommodate other standards development efforts that should be paralleling a particular standard.	The CCMC believes that it can accommodate the prioritization of standards with relevance to reliability as a group as indicated in the existing SAR. Adding appropriate measures and compliance elements to these standards as a group will facilitate implementation of these standards. Separating review on an individual standard basis would not speed up the process or add flexibility in developing these standards. It would also not afford the prioritization of these standards as exists presently in the existing SAR.

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			<p>The individual SARs will also provide a focused view on each standard which will speed up the process of developing, drafting, reviewing and commenting on missing compliance elements to the Version "0" standards. I feel this approach would be more practical than what is being proposed in this "group" SAR and will result in implementation of "missing compliance elements" in a shorter time schedule than is being proposed.</p>	
			<p>We rushed to complete Version 0 and did them all at once, voting all or none. We should not rush in our goal of "adding missing compliance measures". Throwing in the catch phrase of "however, the entire standard should be reviewed to ensure that existing requirements and measures meet the definitions identified in the NERC Reliability Standards Process Manual" is not a strong enough commitment to do an adequate review of all the elements in the time frame suggested. There are several comments, or sticking points, that were uncovered in the Version 0 conversion that did not result in a "clear and unambiguous" translation that should be addressed in the Version 1 of any standard that needs to be changed for any reason, including the addition of compliance elements.</p>	<p>The CCMC has reviewed the industry comments with regards to the scope of the review and changes to the standards identified in this SAR. The CCMC's original and present expectation of this SAR is that ONLY the measures and compliance criteria of the standard will be reviewed, modified, or developed and added. The standard and its requirements will not be evaluated for technical adequacy. If a requirement as presently written cannot effectively be measured for compliance, the next evolution of standard review and update should address these technical concerns. Any revised standard will go through the full NERC Standards Process. The words "however, the entire standard should be reviewed to ensure that the existing requirements and measures meet the definitions identified in the NERC Reliability Standards Process Manual" will be deleted from the SAR.</p>
Individual 7	Alan Adamson – NYSRC	Yes	<p>The NYSRC agrees with the scope of the SAR; however, the title is misleading. The SAR will allow the Drafting Teams to go beyond the addition of the missing compliance measures and elements and perhaps open a full review of the identified Version 0 standards.</p>	<p>The title does reflect the scope of the SAR. The scope will be limited to ONLY the measures and compliance criteria of the standard.</p>
Individual 8	Joanne Borrell – FirstEnergy Solutions Corp.	Yes		
Individual 9	Roger Champagne – Hydro-Quebec TransEnergie	Yes	<p>HQTÉ agree with the scope of the SAR however the title is misleading. The SAR, as written, will allow the Drafting Teams to go beyond the addition of the missing compliance measures and elements and perhaps open a full review of the identified Version 0 Standards.</p>	<p>The title does reflect the scope of the SAR. The scope will be limited to ONLY the measures and compliance criteria of the standard.</p>

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Individual 10	Michael C. Calimano – NYISO	Yes	We agree with the scope of the SAR. The SAR must not allow the Drafting Teams to go beyond the addition of the missing compliance measures and elements (i.e. opening a full review of the identified Version 0 Standards).	The CCMC has reviewed the industry comments with regards to the scope of the review and changes to the standards identified in this SAR. The CCMC’s original and present expectation of this SAR is that ONLY the measures and compliance criteria of the standard will be reviewed, modified, or developed and added. The standard and its requirements will not be evaluated for technical adequacy. If a requirement as presently written cannot effectively be measured for compliance, the next evolution of standard review and update should address these technical concerns. Any revised standard will go through the full NERC Standards Process.
Midwest Reliability Organization	Todd Grosnell – OPPD Terry Bilke – MISO Rober Coish – MHEB Dennis Florom – LES Ken Goldsmith – ALT Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional MRO Members	Yes		
NPCC CP9 Reliability Standards Working Group	Ralph Rufrano – NY Power Authority Peter Lebro – National Grid US David Kiguel – Hydro One Networks Kathleen Goodman–ISO NE Alan Adamson – NY State Rel. Council Greg Campoli – NY ISO Khaqan Khan – the IESO (Ontario) David Little – Nova Scotia Power	Yes	NPCC participating members agree with the scope of the SAR, however the title is misleading. The SAR will allow the Drafting Teams to go beyond the addition of the missing compliance measures and elements and perhaps open a full review of the identified Version 0 Standards.	The title does reflect the scope of the SAR. The scope will be limited to ONLY the measures and compliance criteria of the standard.

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	Roger Champagne – TransEnergie Hydro Quebec John Mosier – Northeast Power Coord. Council Guy V. Zito – Northeast Power Coord. Council			
Southern Company Transmission	Marc Butts Jim Griffith	Yes	We agree with the scope of the proposed modifications, as long as any changes or additions to existing standards follows the process outlined in the NERC Reliability Standards Process Manual.	

Question 3: Do you believe there are additional standards that require compliance or measurement information that were not included in the scope of this SAR?

Group Name	Member Names	Answer 7 Yes 9 No	Comments	Response
Entergy	Ed Davis Richard Riley Jay Zimmerman George Bartlett Jim Case Bill Aycock Lynnda Ell Maurice Casadaban	Yes	All measures and compliance elements of the NERC Standards should be reviewed and revised as needed to ensure relevancy, severity, and consistency throughout all the Standards.	The SAR team agrees that each standard needs to be reviewed for missing measures and compliance elements. However, with only a limited amount of time the team elected to use a prioritization approach based on reliability needs. In the future each standard must be evaluated for relevancy of its requirements and then modified to include the appropriate measures and compliance elements.
FRCC	Eric Senkowitz Linda Campbell	No	Not at this time.	
Independent	Ron Falsetti	Yes	There are several other standards (including BAL-003-0 to BAL-006-0 and	The SAR team agrees that each standard needs to be

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Electricity System Operator (IESO), Ontario	Khaqan khan		EOP-005-0) that are missing either one or both the Measures and/or Compliance elements. We suggest that NERC SDT should review these standards to assess whether their inclusion is required in this SAR.	reviewed for missing measures and compliance elements. However, with only a limited amount of time the team elected to use a prioritization approach based on reliability needs. In the future each standard must be evaluated for relevancy of its requirements and then modified to include the appropriate measures and compliance elements. The SAR team did not believe these were as critical to reliability as the ones selected. Ultimately each and every version 0 standard will need to be reviewed, modified or dropped as part of the standards development process.
Individual 1	Kathy Davis – Tennessee Valley Authority	No		
Individual 2	John Horakh – MAAC	No		
Individual 3	Ed Stein – FirstEnergy Solutions	Yes	Any Standard without a measure needs to be part of this SAR. FAC-003-0 Vegetation Management should be considered for inclusion in the SAR. The addition of compliance measures would aid in insuring a focus on reliability in the area. If no measure can be defined then the Standard is not a true standard and should be eliminated.	FAC-003-0 includes Requirements, Measures, and Compliance sections. It is missing levels of noncompliance. However, FAC-003-1 is currently out for review and includes levels of noncompliance. It is anticipated that the revised FAC-003 will be completed prior to the efforts identified in this SAR and is therefore not included in the SAR.
Individual 4	Ed Riley – California ISO	No		
Individual 5	Kathleen Goodman – ISO NE	No		
Individual 6	Alan Gale – City of Tallahassee	Yes	BAL-004-0, Time Error Correction, does not contain Measures or compliance elements. Although this standard may become a NAESB business practice, some element of reliability will remain.	The SAR team agrees that each standard needs to be reviewed for missing measures and compliance elements. However, with only a limited amount of time the team elected to use a prioritization approach based on reliability needs. In the future each standard must be evaluated for relevancy of its requirements and then modified to include the appropriate measures and compliance elements. The SAR team did not believe these were as critical to reliability as the ones selected. Ultimately each and every version 0 standard will need to be reviewed, modified or dropped as part of the standards development process.
Individual 7	Alan Adamson – NYSRC	No		

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Individual 8	Joanne Borrell – FirstEnergy Solutions Corp.		<p>Any Standard without a measure needs to be part of this SAR. FAC-003-0 Vegetation Management should be considered for inclusion in the SAR. The addition of compliance measures would aid in insuring a focus on reliability in the area.</p> <p>If no measure can be defined then the Standard is not a true standard and should be eliminated.</p>	FAC-003-0 includes Requirements, Measures, and Compliance sections. It is missing levels of noncompliance. However, FAC-003-1 is currently out for review and includes levels of noncompliance. It is anticipated that the revised FAC-003 will be completed prior to the efforts identified in this SAR and is therefore not included in the SAR.
Individual 9	Roger Champagne – Hydro-Quebec TransEnergie	No		
Individual 10	Michael C. Calimano – NYISO	No		
Midwest Reliability Organization	<p>Todd Grosnell – OPPD</p> <p>Terry Bilke – MISO</p> <p>Rober Coish – MHEB</p> <p>Dennis Florom – LES</p> <p>Ken Goldsmith – ALT</p> <p>Alan Boesch – NPPD</p> <p>Jim Maenner – WPS</p> <p>Darrick Moe – WAPA</p> <p>Tom Mielnik – MEC</p> <p>Joe Knight – MRO</p> <p>31 Additional MRO Members</p>	Yes	<p>BAL-003-0 has measures with no compliance</p> <p>BAL-004-0 doesn't have measures or compliance</p> <p>BAL-005-0 and BAL-006-0 has compliance with no measures.</p> <p>EOP-005-0 has compliance but no measures.</p>	The SAR team agrees that each standard needs to be reviewed for missing measures and compliance elements. However, with only a limited amount of time the team elected to use a prioritization approach based on reliability needs. In the future each standard must be evaluated for relevancy of its requirements and then modified to include the appropriate measures and compliance elements. The SAR team did not believe these were as critical to reliability as the ones selected. Ultimately each and every version 0 standard will need to be reviewed, modified or dropped as part of the standards development process.
NPCC CP9 Reliability Standards Working Group	<p>Ralph Rufrano – NY Power Authority</p> <p>Peter Lebro – National Grid US</p> <p>David Kiguel – Hydro One Networks</p> <p>Kathleen Goodman – ISO NE</p> <p>Alan Adamson – NY State Rel. Council</p> <p>Greg Campoli – NY ISO</p> <p>Khaqan Khan – the IESO (Ontario)</p>	No		

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	David Little – Nova Scotia Power Roger Champagne – TransEnergie Hydro Quebec John Mosier – Northeast Power Coord. Council Guy V. Zito – Northeast Power Coord. Council			
Southern Company Transmission	Marc Butts Jim Griffith	Yes	We believe that additional standards concerning a Balancing Authority's generation to load ratio and spinning reserve requirements are necessary to enhance overall system reliability.	It appears that this comment is asking for additional standards rather than the identification and addition of measurements and compliance elements on existing standards. A new standard is beyond the scope of this SAR. If a new standard is required then a SAR needs to be submitted.

Question 4: Do you agree with proposed work schedule prioritizing the standards identified in the SAR?

Group Name	Member Names	Answer 7 Yes 9 No	Comments	Response
Entergy	Ed Davis Richard Riley Jay Zimmerman George Bartlett Jim Case Bill Aycock Lynnda Ell	Yes		

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	Maurice Casadaban			
FRCC	Eric Senkowitz	No	The FRCC suggests that the missing compliance elements review and incorporation efforts be re-prioritized in accordance with the standards overall impacts on Interconnection Reliability. The standards listed in the SAR should be re-prioritized as listed below.	The CCMC has reviewed the industry comments with regards to the priority of revising the standards identified in this SAR. This priority scheme and schedule may shift slightly depending on resources and technical issues. In response to your comments, the following is the priority sequence each year: Revision Year: 2005 (5) - IRO-005-0, IRO-002-0, TOP-001-0, COM-002-0, COM-001-0 2006 (5) - IRO-003-0, EOP-003-0, EOP-006-0, TOP-004-0, TOP-008-0 2007 (6) - TOP-002-0, IRO-001-0, TOP-006-0, VAR-001-0, EOP-002-0, EOP-004-0 2008 (6) - PER-004-0, CIP-001-0, INT-001-0, INT-002-0, INT-003-0, PRC-001-0
	Linda Campbell		<p>The prioritization in this order will allow a focus of resources on providing compliance elements on requirements with the greatest benefit for Interconnection Reliability. As stated earlier, we would also recommend that this SAR be broken out into multiple SARs. One SAR for each standard would be optimal and allow for a more manageable review by the industry along with a smoother drafting, commenting, and balloting process.</p> <p>Standard IRO-005-0 - Reliability Coordination - Current Day Operations</p> <p>Standard IRO-002-0 - Reliability Coordination - Facilities</p> <p>Standard IRO-003-0 - Reliability Coordination - Wide Area View</p> <p>Standard TOP-004-0 - Transmission Operations</p> <p>Standard TOP-008-0 - Response to Transmission Limit Violations</p> <p>Standard TOP-002-0 - Normal Operations Planning</p> <p>Standard IRO-001-0 - Reliability Coordination - Responsibilities and Authorities</p> <p>Standard TOP-001-0 - Reliability Responsibilities and Authorities</p> <p>Standard TOP-006-0 - Monitoring System Conditions</p> <p>Standard PER-004-0 - Reliability Coordination - Staffing</p> <p>Standard VAR-001-0 - Voltage and Reactive Control</p>	
			<p>Standard EOP-004-0 - Disturbance Reporting</p> <p>Standard EOP-003-0 - Load Shedding Plans</p> <p>Standard EOP-006-0 - Reliability Coordination - System Restoration</p> <p>Standard EOP-002-0 - Capacity and Energy Emergencies</p> <p>Standard COM-001-0 - Telecommunications</p> <p>Standard COM-002-0 - Communications and Coordination</p> <p>Standard CIP-001-0 - Sabotage Reporting</p> <p>Standard INT-001-0 - Interchange Transaction Tagging</p> <p>Standard INT-002-0 - Interchange Transaction Tag Communication and Assessment</p> <p>Standard INT-003-0 - Interchange Transaction Implementation</p>	

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			Standard PRC-001-0 - System Protection Coordination	
Independent Electricity System Operator (IESO), Ontario	Ron Falsetti Khaqan khan	No	<p>1). We suggest standards COM-001-0 and COM-002-0 be moved from the Stage 3 category and be added/included in priority stage 1 category (re: pertaining to revision in 2005 and its implementation in 2006). These COM-standards outline requirements, needs and availability of adequate and reliable telecommunication facilities for exchange of interconnection and operating information. These are critical standards requiring priority compliance measures and therefore should be moved to priority/stage 1 category.</p> <p>2). Some of the standards mentioned under the staged priority listing already include compliance measures and non-compliance levels (such as: EOP-002-0, IRO-001-0). It needs to be clarified whether the intention for including such standards is to revise the existing compliance measures and/or levels. We suggest that priority should be given to those standards that do-not have any compliance measures/levels at all, unless there is a critical reliability related need for revision in already existing compliance measures.</p>	<p>The CCMC has reviewed the industry comments with regards to the priority of revising the standards identified in this SAR. This priority scheme and schedule may shift slightly depending on resources and technical issues. In response to your comments, the following is the priority sequence each year:</p> <p>Revision Year: 2005 (5) - IRO-005-0, IRO-002-0, TOP-001-0, COM-002-0, COM-001-0</p> <p>2006 (5) - IRO-003-0, EOP-003-0, EOP-006-0, TOP-004-0, TOP-008-0</p> <p>2007 (6) - TOP-002-0, IRO-001-0, TOP-006-0, VAR-001-0, EOP-002-0, EOP-004-0</p> <p>2008 (6) - PER-004-0, CIP-001-0, INT-001-0, INT-002-0, INT-003-0, PRC-001-0</p>
Individual 1	Kathy Davis – Tennessee Valley Authority	Yes		
Individual 2	John Horakh – MAAC	No	Add one year to every item in the schedule. The first item would become : Reliability Standards to revise in 2006 for implementation in 2007. There is already too much work for 2005, to add more is unreasonable.	CCMC recognizes the amount of work required to develop the missing measures and compliance elements for these standards and has carefully developed a staged work plan taking into consideration the available resources required and the need to complete these standards in a priority that reflects the general consensus of the CCMC on the order and relative importance of the standards to reliability.
Individual 3	Ed Stein – FirstEnergy Solutions	No	TOP-001-0, Reliability Responsibilities and Authorities, is the foundation of reliability and needs to be completed in the first phase. No matter how well Operations Planning and Transmission Operations are defined and detailed, reliability is nothing without having the Transmission Operator recongnize that he or she has the 'responsibility and clear decision-making authority to take wharever action are needed to ensure reliability'. CIP-001-0 Sabotage Reporting of suspected sabotage is much less a threat to reliability than a Transmission Operator without clear decision-making authority.	<p>The CCMC has reviewed the industry comments with regards to the priority of revising the standards identified in this SAR. This priority scheme and schedule may shift slightly depending on resources and technical issues. In response to your comments, the following is the priority sequence each year:</p> <p>Revision Year: 2005 (5) - IRO-005-0, IRO-002-0, TOP-001-0, COM-002-0, COM-001-0</p>

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				<p>2006 (5) - IRO-003-0, EOP-003-0, EOP-006-0, TOP-004-0, TOP-008-0</p> <p>2007 (6) - TOP-002-0, IRO-001-0, TOP-006-0, VAR-001-0, EOP-002-0, EOP-004-0</p> <p>2008 (6) - PER-004-0, CIP-001-0, INT-001-0, INT-002-0, INT-003-0, PRC-001-0</p>
Individual 4	Ed Riley – California ISO	Yes	<p>We are unclear if this SAR is proposing that one SDT would work for four years and do all of the work or would there be a new SDT for each year. We would also like to propose that possibly two SDT's could work on this at the same time and this project could be completed in two years instead of four. We also feel that it will be important to keep the size of these SDT's on the smaller side to help facilitate the work. It is also very important that the proposed additions / changes be balloted and approved by the industry.</p>	<p>The CCMC suggests that as the SAR moves into the standards writing phase of the process, that individual standard writing teams be convened to modify the standards. The CCMC proposes that the SAC in establishing these drafting teams, consider that the team be composed of at least two compliance experts and a technical expert familiar with the requirements of the standard as a minimum. The CCMC stands ready to provide the compliance expertise.</p>
Individual 5	Kathleen Goodman – ISO NE	No	<p>ISO-NE believes COM-002-0 Standard should be moved up in priority. These COM-standards outline requirements, needs and availability of adequate and reliable telecommunication facilities for exchange of interconnection and operating information. These are critical standards requiring priority compliance measures and therefore should be moved up/added into the higher priority/stage 1 category.</p>	<p>The CCMC has reviewed the industry comments with regards to the priority of revising the standards identified in this SAR. This priority scheme and schedule may shift slightly depending on resources and technical issues. In response to your comments, the following is the priority sequence each year:</p> <p>Revision Year: 2005 (5) - IRO-005-0, IRO-002-0, TOP-001-0, COM-002-0, COM-001-0 2006 (5) - IRO-003-0, EOP-003-0, EOP-006-0, TOP-004-0, TOP-008-0</p>
				<p>2007 (6) - TOP-002-0, IRO-001-0, TOP-006-0, VAR-001-0, EOP-002-0, EOP-004-0</p> <p>2008 (6) - PER-004-0, CIP-001-0, INT-001-0, INT-002-0, INT-003-0, PRC-001-0</p>
Individual 6	Alan Gale – City of Tallahassee	No	<p>In addition to the comments in question 2:</p> <p>If you decide the standards identified in question 2 the spread becomes 3/4/7/5. While this is a good amount for 2005 considering that it is already June, EOP-003-0, Load shedding Plans, should be evaluated before 2007. The failure to shed load was identified as a key contributor to the August 14, 2003 blackout and compliance should be addressed sooner rather than later. This would make the spread 4/4/6/5. BAL-004-0 could be added to 2006 to make the final spread 4/5/6/5.</p>	<p>The CCMC has reviewed the industry comments with regards to the priority of revising the standards identified in this SAR. This priority scheme and schedule may shift slightly depending on resources and technical issues. In response to your comments, the following is the priority sequence each year:</p> <p>Revision Year: 2005 (5) - IRO-005-0, IRO-002-0, TOP-001-0, COM-002-0, COM-001-0 2006 (5) - IRO-003-0, EOP-003-0, EOP-006-0, TOP-004-0, TOP-008-0 2007 (6) - TOP-002-0, IRO-001-0, TOP-006-0, VAR-001-0, EOP-002-0, EOP-004-0</p>

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				2008 (6) - PER-004-0, CIP-001-0, INT-001-0, INT-002-0, INT-003-0, PRC-001-0
Individual 7	Alan Adamson – NYSRC	Yes	<p>1. The SAR should provide the basis for its recommended schedule.</p> <p>2. The SAR states that the Version 0 SDT recommended that the modifications be developed on a high priority basis. It appears to us that taking up to four years to make these changes, as proposed in the SAR, can hardly be considered high priority implementation. If NERC still considers this project to be of high priority, perhaps it should evaluate the priority of all other proposed standards together with those recommended in this SAR, for the purpose of developing a comprehensive implementation schedule for ALL standards.</p> <p>3. We specifically recommend that the schedule for modifying EOP-006-0, which is scheduled in the SAR to be modified in 2007, be advanced because of the important need of this system restoration standard.</p> <p>4. We recommend that the COM-002-0 Standard should be moved up in priority. These COM standards outline requirements, needs and availability of adequate and reliable telecommunication facilities for exchange of interconnection and operating information. These are critical standards requiring priority compliance measures and therefore should be moved up/added into the higher priority/stage 1 category.</p>	<p>The recommended schedule reflects the general consensus of the CCMC on the order and relative importance of the standards to reliability.</p> <p>The timeframe for developing the missing measures and compliance elements for these standards reflects the general consensus of the CCMC on the order and relative importance of the standards to reliability. The priority for work on all standards is determined by the SAC.</p> <p>The CCMC has reviewed the industry comments with regards to the priority of revising the standards identified in this SAR. This priority scheme and schedule may shift slightly depending on resources and technical issues. In response to your comments, the following is the priority sequence each year:</p> <p>Revision Year: 2005 (5) - IRO-005-0, IRO-002-0, TOP-001-0, COM-002-0, COM-001-0</p>
				<p>2006 (5) - IRO-003-0, EOP-003-0, EOP-006-0, TOP-004-0, TOP-008-0</p> <p>2007 (6) - TOP-002-0, IRO-001-0, TOP-006-0, VAR-001-0, EOP-002-0, EOP-004-0</p> <p>2008 (6) - PER-004-0, CIP-001-0, INT-001-0, INT-002-0, INT-003-0, PRC-001-0</p>
Individual 8	Joanne Borrell – FirstEnergy Solutions Corp.	No	<p>TOP-001-0, Reliability Responsibilities and Authorities, is the foundation of reliability and needs to be completed in the first phase. No matter how well Operations Planning and Transmission Operations are defined and detailed, reliability is nothing without having the Transmission Operator recognize that he or she has the 'responsibility and clear decision-making authority to take what ever action is needed to ensure reliability'.</p> <p>CIP-001-0 Sabotage Reporting of suspected sabotage is much less a threat to reliability than a Transmission Operator without clear decision-making authority</p>	<p>The CCMC has reviewed the industry comments with regards to the priority of revising the standards identified in this SAR. This priority scheme and schedule may shift slightly depending on resources and technical issues. In response to your comments, the following is the priority sequence each year:</p> <p>Revision Year: 2005 (5) - IRO-005-0, IRO-002-0, TOP-001-0, COM-002-0, COM-001-0</p>

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			CIP-001-0 Sabatoge reporting should exchange places with TOP-001-0 Reliability Responsibilities and Authorities. A clear understanding and measure of responsibility and authority provides a direct effect on and greater assurance of reliability than measuring whether sabatoge reporting is accurate and appropriate	2006 (5) - IRO-003-0, EOP-003-0, EOP-006-0, TOP-004-0, TOP-008-0 2007 (6) - TOP-002-0, IRO-001-0, TOP-006-0, VAR-001-0, EOP-002-0, EOP-004-0 2008 (6) - PER-004-0, CIP-001-0, INT-001-0, INT-002-0, INT-003-0, PRC-001-0
Individual 9	Roger Champagne – Hydro-Quebec TransEnergie	No	HQTÉ believe COM-002-0 Standard should be moved up in priority. This COM standard outline requirements, needs and availability of adequate and reliable telecommunication facilities for exchange of interconnection and operating information. This is a critical standard requiring priority compliance measures and therefore should be moved up/added into the higher priority/stage 1 category.	The CCMC has reviewed the industry comments with regards to the priority of revising the standards identified in this SAR. This priority scheme and schedule may shift slightly depending on resources and technical issues. In response to your comments, the following is the priority sequence each year: Revision Year: 2005 (5) - IRO-005-0, IRO-002-0, TOP-001-0, COM-002-0, COM-001-0 2006 (5) - IRO-003-0, EOP-003-0, EOP-006-0, TOP-004-0, TOP-008-0 2007 (6) - TOP-002-0, IRO-001-0, TOP-006-0, VAR-001-0, EOP-002-0, EOP-004-0 2008 (6) - PER-004-0, CIP-001-0, INT-001-0, INT-002-0, INT-003-0, PRC-001-0
Individual 10	Michael C. Calimano – NYISO	Yes		
Midwest Reliability Organization	Todd Grosnell – OPPD	Yes	As the compliance elements and measures are added to the Reliability Standards, the MRO feels strongly that they should go through the full Standards process to solicit stakeholder input and approval.	The CCMC has reviewed the industry comments with regards to the scope of the review and changes to the standards identified in this SAR. The CCMC’s original and present expectation of this SAR is that ONLY the measures and compliance criteria of the standard will be reviewed, modified, or developed and added. The standard and its requirements will not be evaluated for technical adequacy. If a requirement as presently written cannot effectively be measured for compliance, the next evolution of standard review and update should address these technical concerns. Any revised standard will go through the full NERC Standards Process.

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	<p>Terry Bilke – MISO</p> <p>Rober Coish – MHEB</p> <p>Dennis Florom – LES</p> <p>Ken Goldsmith – ALT</p> <p>Alan Boesch – NPPD</p> <p>Jim Maenner – WPS</p> <p>Darrick Moe – WAPA</p> <p>Tom Mielnik – MEC</p> <p>Joe Knight – MRO</p> <p>31 Additional MRO Members</p>		<p>The MRO has a concern about the length of time proposed to complete the missing compliance elements in Version 0 Standards. Having important compliance elements missing from a standard is a reliability and credibility concern. It is proposed that the CCMC first prepare a detailed template defining the required contents in each compliance element. Using this guide should make the SAR scope of work take less time to accomplish and result in a more consistent and higher quality set of industry standards. The missing compliance elements should be completed within a year.</p>	<p>The CCMC has developed a guideline for developing the compliance elements and will use the guideline as required to assist in this work. The timeframe for developing the missing measures and compliance elements for these standards reflects the general consensus of the CCMC on the order and relative importance of the standards to reliability. The attached schedule is based on the experience of the CCMC, taking into consideration industry comments, and other standards activities currently underway.</p> <p>Revision Year: 2005 (5) - IRO-005-0, IRO-002-0, TOP-001-0, COM-002-0, COM-001-0</p> <p>2006 (5) - IRO-003-0, EOP-003-0, EOP-006-0, TOP-004-0, TOP-008-0</p> <p>2007 (6) - TOP-002-0, IRO-001-0, TOP-006-0, VAR-001-0, EOP-002-0, EOP-004-0</p> <p>2008 (6) - PER-004-0, CIP-001-0, INT-001-0, INT-002-0, INT-003-0, PRC-001-0</p>
<p>NPCC CP9 Reliability Standards Working Group</p>	<p>Ralph Ruffano – NY Power Authority</p> <p>Peter Lebro – National Grid US</p> <p>David Kiguel – Hydro One Networks</p> <p>Kathleen Goodman – ISO NE</p> <p>Alan Adamson – NY State Rel. Council</p>	<p>No</p>	<p>NPCC participating members believe COM-002-0 standard should be moved up in priority. These Com- standards outline requirements, needs, and availability of adequate and reliable telecommunication facilities for exchange of interconnection and operating information. These are critical standards requiring priority compliance measures and therefore should be moved up/ added to the higher priority/stage 1 category.</p>	<p>The CCMC has reviewed the industry comments with regards to the priority of revising the standards identified in this SAR. This priority scheme and schedule may shift slightly depending on resources and technical issues. In response to your comments, the following is the priority sequence each year:</p> <p>Revision Year: 2005 (5) - IRO-005-0, IRO-002-0, TOP-001-0, COM-002-0, COM-001-0</p> <p>2006 (5) - IRO-003-0, EOP-003-0, EOP-006-0, TOP-004-0, TOP-008-0</p> <p>2007 (6) - TOP-002-0, IRO-001-0, TOP-006-0, VAR-001-0, EOP-002-0, EOP-004-0</p> <p>2008 (6) - PER-004-0, CIP-001-0, INT-001-0, INT-002-0, INT-003-0, PRC-001-0</p>

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	Maurice Casadaban			address these technical concerns. Any revised standard will go through the full NERC Standards Process.
FRCC	Eric Senkowicz Linda Campbell	Yes	Some of these "missing elements" may be very minor drafting efforts since the process is to simply convert existing, "approved", requirements to measures, and then develop the accompanying compliance elements. Conversion to multiple SARs will allow these "minor" additions to go through the process without being delayed as a group by some of the more complex elements. This approach will provide drafting teams with clearly defined work scopes and will focus industry review efforts more efficiently by providing smaller postings for review and avoiding multiple revisions of very large documents.	The CCMC believes that it can accommodate the prioritization of standards with relevance to reliability as a group as indicated in the existing SAR. Adding appropriate measures and compliance elements to these standards as a group will facilitate implementation of these standards. Separating review on an individual standard basis would not speed up the process or add flexibility in developing these standards. It would also not afford the prioritization of these standards as exists presently in the existing SAR.
Independent Electricity System Operator (IESO), Ontario	Ron Falsetti Khaqan khan	Yes	Although there is value in this SAR with respect to identifying the schedule and priority, we are of the opinion there should be a separate SAR for each standard that outlines what will be done, frame the Drafting Team's work appropriately and ensure coordination with Version 1 for each.	The CCMC believes that it can accommodate the prioritization of standards with relevance to reliability as a group as indicated in the existing SAR. Adding appropriate measures and compliance elements to these standards as a group will facilitate implementation of these standards. Separating review on an individual standard basis would not speed up the process or add flexibility in developing these standards. It would also not afford the prioritization of these standards as exists presently in the existing SAR.
Individual 1	Kathy Davis – Tennessee Valley Authority	Yes	The need for measurable compliance elements is obvious. What is not so obvious is that such elements might involve significant effort on the industry participants to monitor or document compliance. It is possible that it will be necessary to field test any such measure and VTA suggests incorporating that thought process into the development of these measures.	As each standard is Modified to include measures and compliance elements, the necessity to field test the standard will be evaluated by the drafting team, the CCMC, and by the NERC Compliance Vice president. Furthermore, an Implementation plan with timelines will be developed which may be more important than a field test. these requirements have existed in the operating policies for several years, and the industry should largely be prepared to meet them today.
Individual 2	John Horakh – MAAC	No		
Individual 3	Ed Stein – FirstEnergy Solutions	Yes	Reliability measures and compliance criteria need to be clearly defined and must meet the specific intent of the standard. Appropriate measurers must be consistent with truly measurable criteria. Compliance criteria in certain standards may need to have a phased in application process that is in line with the registration of responsible entities. Implementation of measures and compliance elements needs to consider some allowance of time to allow entities to come into compliance. Not having any measures existing makes it difficult to gauge compliance other than a current interpretation of what that might be.	Compliance measures for the standards will be developed to be measurable consistent with the requirements already defined in the standards. As the Standard Drafting Team develops each standard, the impact and need for an implementation plan to allow time for entities to come into compliance will be considered.

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			Waiting until 2009 for implementation of reliability measures of reliability standards is totally unacceptable. The Industry has to make reliability a priority and define and implement measures for all Reliability Standards by 2007.	The timeframe for developing the missing measures and compliance elements for these standards reflects the general consensus of the CCMC on the order and relative importance of the standards to reliability. The attached schedule is based on the experience of the CCMC, taking into consideration industry comments, and other standards activities currently underway. Revision Year: 2005 (5) - IRO-005-0, IRO-002-0, TOP-001-0, COM-002-0, COM-001-0 2006 (5) - IRO-003-0, EOP-003-0, EOP-006-0, TOP-004-0, TOP-008-0 2007 (6) - TOP-002-0, IRO-001-0, TOP-006-0, VAR-001-0, EOP-002-0, EOP-004-0 2008 (6) - PER-004-0, CIP-001-0, INT-001-0, INT-002-0, INT-003-0, PRC-001-0
Individual 4	Ed Riley – California ISO	Yes	We believe that this SAR should include a schedule and priority.	The CCMC has reviewed the industry comments with regards to the priority of revising the standards identified in this SAR. This priority scheme and schedule may shift slightly depending on resources and technical issues. In response to your comments, the following is the priority sequence each year: Revision Year: 2005 (5) - IRO-005-0, IRO-002-0, TOP-001-0, COM-002-0, COM-001-0 2006 (5) - IRO-003-0, EOP-003-0, EOP-006-0, TOP-004-0, TOP-008-0 2007 (6) - TOP-002-0, IRO-001-0, TOP-006-0, VAR-001-0, EOP-002-0, EOP-004-0 2008 (6) - PER-004-0, CIP-001-0, INT-001-0, INT-002-0, INT-003-0, PRC-001-0
Individual 5	Kathleen Goodman – ISO NE	Yes	ISO-NE believes that, although there is value in this SAR showing schedule and priority, there should be a separate SAR for each standard to outline what will be done and frame the Drafting Team's work appropriately and ensure coordination with Version 1.	The CCMC believes that it can accommodate the prioritization of standards with relevance to reliability as a group as indicated in the existing SAR. Adding appropriate measures and compliance elements to these standards as a group will facilitate implementation of these standards. Separating review on an individual standard basis would not speed up the process or add flexibility in developing these standards. It would also not afford the prioritization of these standards as exists presently in the existing SAR.

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Individual 6	Alan Gale – City of Tallahassee	Yes	<p>The last paragraph in the Detailed Description states that "the entire standard will be reviewed to ensure that the existing requirements and measures meet the definitions identified in the NERC Reliability Standards Process Manual." What "definitions" are referenced here? Would a better statement be "the entire standard will be reviewed to ensure that the existing requirements and measures meet the elements identified in the NERC Reliability Standards Process Manual"?</p>	<p>The CCMC has reviewed the industry comments with regards to the scope of the review and changes to the standards identified in this SAR. The CCMC's original and present expectation of this SAR is that ONLY the measures and compliance criteria of the standard will be reviewed, modified, or developed and added. The standard and its requirements will not be evaluated for technical adequacy. If a requirement as presently written cannot effectively be measured for compliance, the next evolution of standard review and update should address these technical concerns. Any revised standard will go through the full NERC Standards Process.</p>
Individual 7	Alan Adamson – NYSRC	Yes	<p>See our comment to the title of the SAR in Question 2.</p> <p>We also believe that, although there is value in this SAR showing schedule and priority, there should be a separate SAR for each standard to outline what will be done and frame the Drafting Team's work appropriately and ensure coordination with Version 1.</p> <p>In addition, the NYSRC requests the Drafting Team to clarify why standards such as (EOP-002-0, IRO-001-0) with Measure and compliance elements missing were included in this effort while, at the same time, there seems to be an omission of some standards such as (EOP-005-0, BAL-003-0 to BAL-006-0) that are missing those same elements.</p>	<p>The CCMC believes that it can accommodate the prioritization of standards with relevance to reliability as a group as indicated in the existing SAR. Adding appropriate measures and compliance elements to these standards as a group will facilitate implementation of these standards. Separating review on an individual standard basis would not speed up the process or add flexibility in developing these standards. It would also not afford the prioritization of these standards as exists presently in the existing SAR.</p> <p>The measurements and compliance elements contained in the standard do not address all of the standards' requirements. Without providing measurements for each requirement compliance can not adequately be evaluated.</p> <p>The SAR team agrees that each standard needs to be reviewed for missing measures and compliance elements. However, with only a limited amount of time the team elected to use a prioritization approach based on reliability needs. In the future each standard must be evaluated for relevancy of its requirements and then modified to include the appropriate measures and compliance elements. The SAR team did not believe these were as critical to reliability as the ones selected. Ultimately each and every version 0 standard will need to be reviewed, modified or dropped as part of the standards development process.</p>
Individual 8	Joanne Borrell – FirstEnergy Solutions Corp.	Yes	<p>Reliability measures and compliance criteria need to be clearly defined and must meet the specific intent of the standard. Appropriate measurers must be consistent with truly measurable criteria. Compliance criteria in certain standards may need to have a phased in application process that is in line with the registration of responsible entities. Implementation of measures and compliance elements needs to consider some allowance of time to allow entities to come into compliance. Not having any measures existing makes it difficult to gauge compliance other than a current interpretation of what that might be.</p>	<p>Compliance measures for the standards will be developed to be measurable consistent with the requirements already defined in the standards. As the Standard Drafting Team develops each standard, the impact and need for an implementation plan to allow time for entities to come into compliance will be considered.</p>

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			<p>Waiting until 2009 for implementation of reliability measures of reliability standards is unacceptable. The Industry has to make reliability a priority and define and implement measures for all Reliability Standards by 2007.</p>	<p>The timeframe for developing the missing measures and compliance elements for these standards reflects the general consensus of the CCMC on the order and relative importance of the standards to reliability. The attached schedule is based on the experience of the CCMC, taking into consideration industry comments, and other standards activities currently underway.</p> <p>Revision Year: 2005 (5) - IRO-005-0, IRO-002-0, TOP-001-0, COM-002-0, COM-001-0 2006 (5) - IRO-003-0, EOP-003-0, EOP-006-0, TOP-004-0, TOP-008-0 2007 (6) - TOP-002-0, IRO-001-0, TOP-006-0, VAR-001-0, EOP-002-0, EOP-004-0 2008 (6) - PER-004-0, CIP-001-0, INT-001-0, INT-002-0, INT-003-0, PRC-001-0</p>
Individual 9	Roger Champagne – Hydro-Quebec TransEnergie	Yes	<p>The SAR, in its title and description, should clearly indicate the extent of the proposed revision.</p> <p>HQTÉ also believe that although there is value in this SAR showing schedule and priority, there should be a separate SAR for each standard to outline what will be done and frame the Drafting Team's work appropriately and ensure coordination with Version 1.</p>	<p>The title does reflect the scope of the SAR. The scope will be limited to ONLY the measures and compliance criteria of the standard.</p> <p>The CCMC believes that it can accommodate the prioritization of standards with relevance to reliability as a group as indicated in the existing SAR. Adding appropriate measures and compliance elements to these standards as a group will facilitate implementation of these standards. Separating review on an individual standard basis would not speed up the process or add flexibility in developing these standards. It would also not afford the prioritization of these standards as exists presently in the existing SAR.</p>

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			<p>In addition HQTÉ ask the Drafting Team to clarify why standards such as (EOP-002-0, IRO-001-0) with Measure and compliance elements were included in this effort while, at the same time, there seems to be an omission of some standards such as (EOP-005-0, BAL-003-0 to BAL-006-0) that are missing those same elements.</p>	<p>The measurements and compliance elements contained in the standard do not address all of the standards' requirements. Without providing measurements for each requirement compliance can not adequately evaluated.</p> <p>The SAR team agrees that each standard needs to be reviewed for missing measures and compliance elements. However, with only a limited amount of time the team elected to use a prioritization approach based on reliability needs. In the future each standard must be evaluated for relevancy of its requirements and then modified to include the appropriate measures and compliance elements. The SAR team did not believe these were as critical to reliability as the ones selected. Ultimately each and every version 0 standard will need to be reviewed, modified or dropped as part of the standards development process.</p>
Individual 10	Michael C. Calimano – NYISO	No		
Midwest Reliability Organization	<p>Todd Grosnell – OPPD</p> <p>Terry Bilke – MISO</p> <p>Rober Coish – MHEB</p> <p>Dennis Florom – LES</p> <p>Ken Goldsmith – ALT</p> <p>Alan Boesch – NPPD</p> <p>Jim Maenner – WPS</p> <p>Darrick Moe – WAPA</p> <p>Tom Mielnik – MEC</p> <p>Joe Knight – MRO</p> <p>31 Additional MRO Members</p>	Yes	<p>EOP-002-0 and IRO-001-1 are on the list to be evaluated but contain both measures and compliance elements that currently exist in these standards?</p> <p>While currently reviewing the Standards the CCMC should consider or propose elimination of standard requirements that cannot be measured.</p>	<p>The measurements and compliance elements contained in the standard do not address all of the standards' requirements. Without providing measurements for each requirement compliance can not adequately evaluated. The CCMC has reviewed the industry comments with regards to the scope of the review and changes to the standards identified in this SAR. The CCMC's original and present expectation of this SAR is that ONLY the measures and compliance criteria of the standard will be reviewed, modified, or developed and added. The standard and its requirements will not be evaluated for technical adequacy. If a requirement as presently written cannot effectively be measured for compliance, the next evolution of standard review and update should address these technical concerns. Any revised standard will go through the full NERC Standards Process.</p>

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Southern Company Transmission	Marc Butts Jim Griffith	Yes	In the Detailed Description section, first paragraph, second sentence, change the phrase "reliability standards that are missing measures and compliance elements" to "reliability standards that have missing measures and/or compliance elements."	
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