

Comments on Reliability Standards Errata

The Standards Committee thanks all commenters who submitted comments on the various Reliability Standards errata. NERC posted the errata for a 30-day comment period from July 2 through July 31, 2008 to provide stakeholders an opportunity to identify any material impacts associated with the errata that staff may have missed. The stakeholders were asked to provide feedback on the errata through a special Standard Comment Form. There were 14 sets of comments, including comments from 49 different people from approximately 40 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

http://www.nerc.com/~filez/standards/Standards_Errata.html

Based on the comments received, the Standards Committee's Process Subcommittee is recommending that the Standards Committee approve moving already identified corrections to the following standards forward for adoption by the Board of Trustees without any additional modifications:

- BAL-001-0a — Real Power Balancing Control Performance
- BAL-003-0a — Frequency Response and Bias
- BAL-005-0a — Automatic Generation Control
- BAL-006-1 — Inadvertent Interchange
- COM-001-1 — Telecommunications
- FAC-010-1, FAC-011-1, FAC-014-1 — Implementation Plan
- MOD-015-0 — Development of Interconnection-Specific Dynamic System Models
- MOD-016-1 — Documentation of Data Reporting Requirements for Actual and Forecast Demands, Net Energy For Load, and Controllable Demand Side Management
- MOD-017-0 — Aggregated Actual and Forecast Demands and Net Energy For Load
- MOD-019-0 — Forecasts of Interruptible Demands and DCLM
- PRC-016-0 — System Protection System Misoperations
- TOP-005-1 — Operational Reliability Information
- TPL-001-0 — System Performance Under Normal Conditions
- VAR-002-1a — Generator Operation for Maintaining Network Voltage Schedules

The Standards Committee's Process Subcommittee is recommending that the Standards Committee approve moving already identified corrections to the following standards forward for adoption by the Board of Trustees with the additional modifications noted by stakeholders:

- EOP-002-2 — Capacity and Energy Emergencies
 - Corrected date in the version history table
- IRO-001-1 — Reliability Coordination — Responsibilities and Authorities
 - Removed the word, "Proposed" from the "Effective Date" subheading
- MOD-006-0 — Procedures for Use of CBM Values
 - Corrected the typographical error (preservation to reservation) in the measures to match the correction identified in the requirement

The Standards Committee's Process Subcommittee is recommending that the Standards Committee not approve moving the proposed corrections to the following standard forward for adoption by the Board of Trustees as the corrections go beyond the scope of errata:

- EOP-004-1 — Disturbance Monitoring

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. There are several approved NERC standards that contain errors that have been identified as errata. If you disagree with this determination, please identify the specific standard that includes the errata, and the material impact of not accepting the error as errata. 6

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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.	Guy Zito	NPCC RSC		x											
Additional Member	Additional Organization	Region		Segment Selection											
1.	David Kiguel	Hydro One Networks, Inc.													1
2.	Don Nelson	Massachusetts Dept. of Public Utilities													9
3.	Ron Falsetti	Independent Electricity System Operator													2
4.	Ralph Rufrano	New York Power Authority													5
5.	Mike Ranalli	National Grid													3
6.	Brian Gooder	Ontario Power Generation, Inc.													5
7.	Roger Champagne	Hydro-Quebec TransEnergie													2
8.	Alan Adamson	New York State Reliability Council													10
9.	Ron Hart	Dominion Resources, Inc.													5
10.	Rick White	Northeast Utilities													1
11.	Greg Campoli	New York Independent System Operator													2
12.	Kathleen Goodman	ISO New England													2
13.	Ed Thompson	Consolidated Edison Co. of New York, Inc.													1
14.	Sylvain Clermont	Hydro-Quebec TransEnergie													1
15.	Randy MacDonald	New Brunswick System Operator													2
16.	Brian Evans-Mongeon	Utility Services													6
17.	Mike Gildea	Constellation Energy													6
18.	Lee Pedowicz	NPCC													10
19.	Gerry Dunbar	NPCC													10
20.	Brian Hogue	NPCC													10
2.	Kris Manchur	Manitoba Hydro		x		x		x	x						
3.	Jim Eckels	FirstEnergy Corp.		x											
4.	Sam Ciccone	FirstEnergy Corp.		x		x		x	x						
Additional Member	Additional Organization	Region	Segment Selection												
1.	Doug Hohlbaugh	FE	RFC	1, 3, 5, 6											
2.	Dave Folk	FE	RFC	1, 3, 5, 6											
5.	Denise Koehn	Bonneville Power Administration		x		x		x	x						
6.	Alan Gale	City of Tallahassee		x		x		x							
7.	Kirit S. Shah	Ameren		x		x						x			

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Commenter		Organization	Industry Segment										
			1	2	3	4	5	6	7	8	9	10	
8.	Ron Falsetti	Ontario IESO		x									
9.	Larry Brusseau	MRO NERC Standards Review Subcommittee (NSRS)											x
Additional Member		Additional Organization	Region	Segment Selection									
1.	Neal Balu	Wisconsin Public Service	MRO	3, 4, 5, 6									
2.	Terry Bilke	Midwest ISO Inc.	MRO	2									
3.	Carol Gerou	Minnesota Power	MRO	1, 3, 5, 6									
4.	Jim Haigh	Western Area Power Administration	MRO	1, 6									
5.	Ken Goldsmith	Alliant Energy	MRO	4									
6.	Tom Mielnik	MidAmerican Energy Company	MRO	1, 3, 5, 6									
7.	Pam Sordet	Xcel Energy	MRO	1, 3, 5, 6									
8.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6									
9.	Eric Ruskamp	Lincoln Electric System	MRO	1, 3, 5, 6									
10.	Joseph Knight	Great River Energy	MRO	1, 3, 5, 6									
11.	Joe DePoorter	Madison Gas & Electric	MRO	3, 4, 5, 6									
12.	Mike Brytowski	Midwest Reliability Organization	MRO	10									
10.	Alice Druffel	Xcel Energy	x		x		x	x					
11.	Jason Shaver	American Transmission Company	x										
12.	Martin Bauer	U.S. Department of Reclamation					x						
13.	Jalal Babik	Dominion Resources, Inc.					x						
Additional Member		Additional Organization	Region	Segment Selection									
1.	Jalal Babik	Dominion Resources Inc.	SERC	5									
2.	Louis Slade	Dominion Resources Inc.	SERC	5									
14.	Marie Knox	Midwest ISO, Inc.		x									

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1. There are several approved NERC standards that contain errors that have been identified as errata. If you disagree with this determination, please identify the specific standard that includes the errata, and the material impact of not accepting the error as errata.

Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.

No - I do not agree that the noted errors in the reliability standards are correctly identified as errata.

Summary Consideration: The Standards Committee thanks everyone that submitted comments on these errata changes. We received comments on seven out of the fourteen standards included in this proceeding. Most stakeholders agreed that the corrections posted for comment are "errata." The proposed modifications to EOP-004-1 – Disturbance Monitoring (replacing Form "EIA-417" with "OE-417") will not move forward as errata. The Standards Committee has made this decision because Forms "EIA-417" and "OE-417" have a number of differences that go beyond a simple name change and are beyond the scope of corrections that fall under the "errata" classification.

The Standards Committee will recommend that all other errata identified in the posting, as well as the following additional modifications identified by stakeholders move forward – first for approval by the entire Standards Committee, then for adoption by the NERC Board of Trustees, and finally for approval by applicable governmental authorities.

- EOP-002-2 — Capacity and Energy Emergencies
 - Corrected the date in the version history table
- IRO-001-1 — Reliability Coordination — Responsibilities and Authorities
 - Removed the word, "Proposed" from the "Effective Date" subheading in the Introduction section of the standard
- MOD-006-0 — Procedures for Use of CBM Values
 - Corrected the typographical error (changed preservation to reservation) in the measures to match the correction already identified in the requirement

Organization	Question 1:	Question 1 Comments:
American Transmission Company		All of the standards list in this errata proceeding should have its version number updated in order to indicate that a change occurred. BAL-001-0a changes to BAL-001-1aBAL-003-0a changes to BAL-003-1aBAL-005-0a changes to BAL-005-1aBAL-006-1 changes to BAL-006-2COM-001-1 changes to COM-001-2EOP-002-2 changes to EOP-002-3.....etc
Response: Agreed. The draft errata procedure being developed by the Standards Committee calls for the version number to be updated after BOT adoption.		
FirstEnergy Corp.	No - I do not agree that the noted errors in the reliability standards are correctly identified as errata.	EOP-004: Attachment 2 needs a complete re-write to explain the new DOE oe-417 form. The only change I saw was to change EIA to OE. It currently doesn't show the 1 & 6 hour reporting requirements of the new DOE oe-417 report. I feel this might be

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		more than an errata change.
<p>Response: The Standards Committee has reviewed all comments related to EOP-004 and has determined not to proceed with replacing the reference of "EIA-417" with "OE-417". The Standards Committee has made this decision because Forms "EIA-417" and "OE-417" have a number of differences that go beyond a simple name change, therefore the proposed change will not go forward in this errata proceeding.</p>		
FirstEnergy Corp.	No - I do not agree that the noted errors in the reliability standards are correctly identified as errata.	<p>1. BAL-006-1: Version history wording should be revised from, "Added following to "Effective Date:" and footer This standard will expire for one year beyond the effective date..." This standard will expire one year beyond the effective date... The other proposed errata should be reviewed for this same condition and adjusted as needed. The language quoted in the red line that was posted was an accurate representation of the language that was first added to the "Effective date" and "footer" and then removed after the Reliability Standards Development Procedure was revised to allow Urgent Action standards to remain in place for longer than a year under specified conditions.</p> <p>2. EOP-004-1: In EOP-004-1 one instance of EIA-417 was not changed to OE-417 on page 10 of 17 in the paragraph that begins, "Form EIA-417 must be submitted..."</p> <p>3. EOP-004-1 Att. 2 - The nine (9) items listed at the bottom of pg. 10 and top of pg. 11 should match the OE-417 document which lists the following twelve (12) items:</p> <ol style="list-style-type: none"> 1. Actual physical attack that causes major interruptions or impacts to critical infrastructure facilities or to operations 2. Actual cyber or communications attack that causes major interruptions of electrical system operations 3. Complete operational failure or shut-down of the transmission and/or distribution electrical system 4. Electrical System Separation (Islanding) where part or parts of a power grid remain(s) operational in an otherwise blacked out area or within the partial failure of an integrated electrical system 5. Uncontrolled loss of 300 Megawatts or more of firm system loads for more than 15 minutes from a single incident 6. Load shedding of 100 Megawatts or more implemented under emergency operational policy 7. System-wide voltage reductions of 3 percent or more 8. Public appeal to reduce the use of electricity for purposes of maintaining the continuity of the electric power system 9. Suspected physical attacks that could impact electric power system adequacy or reliability; or vandalism which target components of any security systems 10. Suspected cyber or communications attacks that could impact electric power system adequacy or vulnerability 11. Loss of electric service to more than 50,000 customers for 1 hour or more 12. Fuel supply emergencies that could impact electric power system adequacy or

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		<p>reliability</p> <p>Also, the first sentence of the next paragraph following the list of system failures and interruptions (as shown above) should be revised as follows to reflect the 1hr and 6hr requirements of the DOE form:</p> <p>"The initial DOE Emergency Incident and Disturbance Report (form OE-417 – Schedule 1) shall be submitted to the DOE Operations Center within 60 minutes of the time of the system disruption if any of the Items 1-8 are checked, but may be extended to within 6 hours if ONLY one or more of the Items in 9-12 are checked."</p> <p>The Standards Committee has reviewed all comments related to EOP-004 and has determined not to proceed with replacing the reference of "EIA-417" with "OE-417". The Standards Committee has made this decision because Forms "EIA-417" and "OE-417" have a number of differences that go beyond a simple name change, therefore the proposed change will not go forward in this errata proceeding.</p> <p>4. Implementation Plan for FAC-010-1, FAC-011-1 and FAC-014-1: On Pg.4 of the implementation plan, the effective date is showing timelines after BOT approval. But technically, the effective date is a timeframe after regulatory approval, or in those jurisdictions not requiring regulatory approval, then a timeframe after BOT approval.</p> <p>When FAC-010-1, FAC-011-1, and FAC-014-1 were developed, the standards staff advised drafting teams to include firm effective dates in the standards. The dates shown in the implementation plan are an accurate representation of what was approved.</p> <p>5. IRO-001-1: Why does A.5. state: "(Proposed) Effective Date" - Shouldn't it say "Effective Date"?</p> <p>IRO-001-1 should state, "Effective Date" – the word, "Proposed" should be removed once the standard is approved.</p> <p>6. General to all Standards: We believe the effective dates shown in each standard reflect regulatory approval. For instance, all of the initial 83 standards were approved by FERC per order 693 and effective March 2007. It should be clear in the standards what the actual regulatory "approval" dates are versus the actual "effective" dates which may be a timeframe after approval due to implementation periods.</p> <p>This is difficult since, in addition to FERC, there can be several other regulatory authorities providing approval of standards. We are adding the "approval date" for</p>
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		each regulatory authority to the “Regulatory Approved Standards” web page. The Standards Committee is always looking at ways to improve the clarity of standards and this concern will be considered during future improvements.
Response: Please see the “in line” responses to your comments.		
Ameren	No - I do not agree that the noted errors in the reliability standards are correctly identified as errata.	Concerning the 'Description of Correction' related to EOP-004-1, Disturbance Reporting: the statement incorrectly refers to Form OE-411. It should be Form OE-417 instead. As a result the Version History in the referenced Standard is correspondingly incorrect.
Response: You are correct that the Version History incorrectly identifies the form as OE-411. This correction will be made in the next regular update of this standard. FYI: The Standards Committee has reviewed all comments related to EOP-004 and has determined not to proceed with replacing the reference of "EIA-417" with "OE-417". The Standards Committee has made this decision because Forms "EIA-417" and "OE-417 have a number of differences that go beyond a simple name change, therefore the proposed change will not go forward in this errata proceeding.		
Xcel Energy	No - I do not agree that the noted errors in the reliability standards are correctly identified as errata.	EOP-002-2 There appears to be no indication that Load Serving Entities (LSE) was “inadvertently omitted” from the applicability section of the standard. This type of “error” is substantial and should be vetted through the standards development process. Furthermore, an updated version, including LSEs, should not be posted until this has received proper approval. Recommend removing the updated version from the website immediately. In addition to the identified errata, we would like to point out these 2 additional errata: EOP-002-2 Version history date of Sept. 19, 2008 should be Sept. 19, 2006. MOD-006-0 The word “preservation” should be corrected to “reservation” in the Measures, in addition to the Requirements.
Response: The Standards Committee believes that this error does not change the scope or technical content of the standard. This addition clarifies in the Applicability Section the applicability of the Standard. EOP-002-2, Requirement 9.1 is assigned to the Load-serving Entity. During the development of Version 0, the requirements were written, and then the applicability section of the standard was populated. The V0 SDT missed adding the LSE to the applicability section of the standard. EOP-002-0 was replaced with EOP-002-1 as part of the implementation plan for the Coordinate Operations standards. EOP-002-1 was replaced with EOP-002-2 as part of the Missing Measures and Compliance Elements project. You are correct, there is a typographical error in Version History section, the date –should be “2006” rather than “2008.” This correction will be included in this errata change proceeding. The Standards Committee will include similar corrections in the Measures Section, in MOD-006, so that all references to "preservation" are changed to "reservation".		
MRO NERC Standards Review Subcommittee (NSRS)	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	Also note the following discrepancies:EOP-002-2, under Version History, version 1, the date may be wrong, "September 19, 2008" (?), this may be a type-o, possbily should read "2006".

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		EOP-004-1, under Version History, version 1, under Action, the form (OE-411) that is referenced is not contained in the Standard; Possible a type-o, possibly should read "Form OE 417".
<p>Response: EOP-002 -2 You are correct, there is a typographical error in Version History section, the date –should be “2006” rather than “2008.” This correction will be included in this errata change proceeding.</p> <p>EOP-004-1: You are correct that the Version History incorrectly identifies the form as OE-411. This correction will be made in the next regular update of this standard. FYI: The Standards Committee has reviewed all comments related to EOP-004 and has determined not to proceed with replacing the reference of "EIA-417" with "OE-417". The Standards Committee has made this decision because Forms "EIA-417" and "OE-417" have a number of differences that go beyond a simple name change, therefore the proposed change will not go forward in this errata proceeding.</p>		
NPCC RSC	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	Note that in EOP-002-2 Capacity and Energy Emergencies there is an error in the errata. In Version 1 of the Version History, there is an erroneous date of Sept. 19, 2008.
<p>Response: You are correct, there is a typographical error in Version History section, the date –should be “2006” rather than “2008.” This correction will be made in the next update of this standard.</p>		
U.S. Department of Reclamation	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	In reference to TPL-001-0. The errata corrected the reference in M1 to read TPL-001-0 R1 and TPL-001-0 R2. The reference to R2 however is incorrect. R2 requires that Planning Authority and Transmission Planner shall provide a written summary and not a valid assessment and corrective plans as referenced in M1.
<p>Response: A measure can be used for more than one requirement. In this case, M1 is used for both R1 (to have a valid assessment) and R2 (to have a corrective plan if needed).</p>		
Manitoba Hydro	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	EOP-002-2 - Although adding "Load Serving Entity" in the Applicability List is a stretch for an errata we believe it can be justified being that from day one the Attachment 1 clearly includes the Load Serving Entity. MOD-006-0 - Should also change "preservation" to "reservation" in M1 and M2
<p>Response: The Standards Committee thanks you for your support. It's our position that the addition only clarifies what the standard current contains and that it does not change the scope or technical content of the standard.</p> <p>The Standards Committee will include similar corrections in the Measures Section, in MOD-006, so that all references to "preservation" are changed to "reservation"</p>		
Ontario IESO	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	The IESO supports these errata changes.
<p>Response: The Standards Committee thanks you for your support.</p>		
Bonneville Power Administration	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
City of Tallahassee	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	

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Dominion Resources, Inc.	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Midwest ISO, Inc.	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	