

## Comment Form for Compliance Elements

Please use this form to submit comments on the Compliance Elements Standard Drafting Team's second draft of the 20 Missing Compliance Measures and Elements standards. Comments must be submitted by **August 23, 2006**. You must submit the completed form by e-mail to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Compliance Elements" in the subject line. If you have questions please contact Richard Schneider at [richard.schneider@nerc.net](mailto:richard.schneider@nerc.net) or 609-452-8060.

### ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

- DO:**
- Do** enter text only, with no formatting or styles added.
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  - Do** submit any formatted text or markups in a separate WORD file.

- DO NOT:**
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  - Do not** use numbering or bullets in any data field.
  - Do not** use quotation marks in any data field.
  - Do not** submit a response in an unprotected copy of this form.

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



## Comment Form for Compliance Elements

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Please Enter All Comments in Simple Text Format.

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

The implementation plan for this set of standards assumes that the set of standards will be approved by the stakeholders in October 2006 and by the NERC Board of Trustees in November 2006. The proposed effective date for all revisions would be January 1, 2007. The drafting team is recommending that the set of standards be balloted with a single ballot.

1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments:

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments:

INT-003-2

D 2.3 and 2.4 non compliance measures appear to provide both a level 3 and a level 4 non-compliance for the exact same measure (3 instances of non-compliance in both levels with the distinguisher being the words every one or either. Further clarification of the difference is required.)

PRC-001-1

D.3.4.1 Levels of non-compliance for transmission operators. This level of non-compliance requires appears to be requiring a transmission operator to coordinate the installation of protective systems with itself in addition to its BA. I would suggest correcting this by changing the wording to read Neighboring Transmission Operators.

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Donovan E Greening	
Organization:	ITC Transmission	
Telephone:	248 374 7056	
E-mail:	Dgreening@itctransco.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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The implementation plan for this set of standards assumes that the set of standards will be approved by the stakeholders in October 2006 and by the NERC Board of Trustees in November 2006. The proposed effective date for all revisions would be January 1, 2007. The drafting team is recommending that the set of standards be balloted with a single ballot.

1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments: the majority of these standards still require additional work with respect to measures and compliance levels. The standards should be balloted individually or balloted in subject matter groups.

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments:

\*COM-001-1 Telecommunications= For Transmission Operators, Balancing Authority or Reliability Coordinator revised item 2.3.1 should be moved to Level 4. As commented previously critical that all parties are speaking the same language to ensure no misinterpretations.

\*COM-002-2 Communications and Coordination= there are missing measures that should have been developed for Requirments 4, 5, 6 and 7 and the levels of non compliance does not reflect the requirements to have voice and data links working and available There should be a level of non compliance for failure to maintain voice and data links. Also for Balancing Authority, missing Level 3 requirements.

\*EOP-002-2 Capacity and Energy Emergencies=resolve missing measurement provisions and increase data retention to one year.

\*EOP-003-1 Load Shedding Plans=resolve missing measurement provisions for requirements 2, 5 and 6 and the standard does not have a measure or compliance level for not maintaining EMS or load shedding relaying scheme to ensure manual or automatic load shedding is possible.

\*EOP 004-2 Disturbance Reporting= resolve missing measurement provisions for requierment 4. For Levels of Non-Compliance for RCs, BAs, etc., Level 1 should be Level 3. Timely reporting is a must by all cited entities.

\*EOP-006-1 Reliability Coordination- System Restoration=measurement #2 is redundant with measure #4.

\*INT-001-2 Interchange Information=increase data retention to one year.

## Comment Form for Compliance Elements

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\*INT-003-2 Interchange Transaction Implementation= increase data retention to one year.

\*IRO-001-1 Reliability Responsibilities and Authorities= many of the requirements are not measurable. Also resolve missing measurement provisions for requirements 2 and 9 and increase data retention to one year.

\*IRO-002-1 Reliability Coordination Facilities. resolve missing measurement provisions for requirements 3, 5 and 6 and increase data retention to one year.

\*IRO-003-2 Reliability Coordination -Wide Area View The measure should be revised to provide evidence for both pre and post contingency conditions.

\*IRO-005-2 Reliability Coordination -Current Day Operations= resolve missing measurement provisions for requirement 3 part 3, 10, 13 part 1, 16 and 17 and increase data retention to one year. Also re insert Reliability Coordination requirements in R7. Measure 13 is missing wording.

\*PER-004-1 Reliability Coordination- Staffing=resolve missing measurement provisions for requirement 5.

\*PRC-001-1 System Protection Coordination= resolve missing measurement provisions for requirements 1, 4, 5, 6 and 7.

CEDST did not develop a measure for requirement 4 because Transmission Operator do not coordinate protection with other Transmission Operators. There is a reasonable expectation that interconnected Transmission Operation organizations coordinate system protective schemes ITC does not agree with this comment

With respect to levels of non compliance- There should be a violation level for not properly maintaining or updating the installed protection schemes.

\*TOP-001-1 Reliability Responsibilities and Authorities=resolve missing measurement provisions for requirement 8.

\*TOP-002-1 Normal Operations Planning=resolve missing measurement provisions for requirements 2, 3, 4, 13 and 19 and increase data retention times to one year. For Compliance Generation Operators Level 3 item in original proposal should be part of Level 4. Critical to Balancing Authorities and Transmission Operators that Generation Operators perform such verifications. Should not be eliminated.

\*TOP-004-1 Transmission Operations=resolve missing measurement provisions for requirements 1, 2, 3 and 5 . Operating within SOL and IROL limits is not optional. Operating outside system limits for more than 30 minutes is a violation of NERC standards, also increase retention time to one year.

\*TOP-006-1 Monitoring System Conditions= the is no requirement or measure for the responsible entities to have post contingent capability or a back up to EMS. Resolve missing measurement provision for requirement 3 and 6, also increase data retention time to one year.

\*TOP-008-1 Response to Transmission Limit Violations=resolve missing measurement provision for requirement 2 and 4 part 2. There should be a level of non compliance for operating over system operating limits for more than 30 minutes

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3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments: as a general comment there is a lack on consistency with respect to data retention in the standards. The retention requirements vary widely from 90 days to two years. Data retention should be standardized for all of the standards.

There are still a number of missing measures throughout the twenty standards in question. For each requirement included in a standard there should be a corresponding measure. All requirements and measures should be in place before balloting

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Edward Dahill	
Organization:	National Grid	
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NERC Region		Registered Ballot Body Segment
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1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments: If approved by the stakeholder process, only the three proposed standards EOP-006-1, INT-001-2 and INT-003-2 should be presented to the NERC Board of Trustees for its approval in November 2006. The remaining 17 proposed standards require additional work to complete the missing compliance elements. Given the amount of indicated additional work, it is doubtful that the 17 can be completed and obtain stakeholder approval before the November 2006 NERC Board of Trustees meeting. Additionally, depending on the treatment of consolidating duplicate requirements presented in multiple standards, the impacted standards will need to be revised for applicability and compliance elements and obtain stakeholder approval before submittal to the NERC Board of Trustees.

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments: See attached WORD document for National Grid's specific comments for Standards CIP-001-1, COM-001-1, EOP-002-2, PRC-001-1, TOP-001-1 and TOP-002-1.

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments:

National Grid's Comments to  
20 Proposed Standards Missing Compliance Elements  
Due August 23, 2006

**General Statement:**

- Need to verify Levels of Non-Compliance to ensure consistency for all 102 Standards filed on April 4, 2006 and any Standards filed thereafter. In many cases, there only is the possibility of Level 4 non-compliance. Typically a lower level of non-compliance is assessed prior to reaching Level 4, particularly in cases where the level of risk associated with the non-compliance is low. The Levels of Non-Compliance need to be reviewed to ensure they are consistent with the associated risk.
- Only the three Standards EOP-006-1, INT-001-2 and INT-003-2 should be considered as complete and may be submitted to the NERC Board of Trustees for approval and submission to FERC under the ERO process.
- The seventeen Standards CIP-001-1, COM-001-1, COM-002-2, EOP-002-2, EOP-003-1, EOP-004-2, IRO-001-1, IRO-002-1, IRO-003-1, IRO-005-2, PER-004-1, PRC-001-1, TOP-001-1, TOP-002-1, TOP-004-1, TOP-006-1 and TOP-008-1 are incomplete and require additional Requirements and Measures modifications before submittal to the NERC Board of Trustees for approval.
- Requirements that are defined by the CESDT to be duplicates should be consolidated into a single Standard with appropriate changes to the Applicability section of the resultant Standard.
- National Grid proposes the elimination of any Requirement that the CESDT has defined as vague or needs additional definition to provide a effectively measurable and enforceable Requirement. Unless one can clearly and concisely define a requirement, the requirement has no value and should be eliminated. The determination to eliminate any Requirements should be made by the entities that will be impacted by the Requirement. Any entity desiring to maintain the Requirement to be eliminated will have the responsibility to justify why the Requirement should be maintained. This would include providing the appropriately worded compliance element sections for the Requirement.
- In National Grid's opinion, the process associated with providing the missing compliance elements has highlighted several major flaws in the method NERC has taken to complete these standards. Each group of Standards should have been completed by subject matter experts at a minimum, if not the original Drafting Team for each Standard. Many of the incomplete Measures are the result of the Compliance Elements Standards Drafting Team (CESDT) members not being familiar with the technical content of the Standards. National Grid is also concerned that the CESDT may be overwhelmed by the number of Standards that must be addressed, and as a result are "short-cutting" the development of Levels of Non-Compliance such that many Standards have only Level 4 non-compliance associated with each and every Requirement. The Levels of Non-

Compliance need to be consistent with the level of risk associated with each Requirement.

**Detailed Specifics related to Each Standard:**

CIP-001-1: Sabotage Reporting Reliability Coordinators

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- The CESDT has not provided a measure for Requirement 2 as it is a subset of Requirement 3. Without the Requirement 2 measure this Standard should be considered incomplete.
- Recommend that Requirements 2 and 3 be combined into a single Requirement.

COM-001-1: Telecommunications

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- CESDT did not provide measures for Requirements:
  - 1 as duplicate of COM-002-2 Requirement 1
  - 2.2 based on need to define the term ‘Special attention shall be given’
  - 3 need to clarify the terms ‘shall provide a means to coordinate’ and ‘shall include the ability to investigate’
- National Grid recommends having Requirement 1 be present in only one standard. Therefore, recommend removing Requirement from Standard COM-002-2.
- National Grid continues to agree with FERC’s assessment that telecommunication facilities are an integral part of a complex set of operating tools and that they are necessary in maintaining a reliable system. Specifications defining adequate and reliable telecommunications facilities would assist in ensuring compliance.
- The CESDT also concluded that the proposed NERC standards were lacking recommendations; specifically the tightening of communication protocols during alerts and emergencies. National Grid may agree that proper communication protocols among the operating entities are essential for maintaining reliable system operations. However, we disagree these communication protocols be included (or mixed) with the standards for communication facilities.
- The proposed NERC standard (effective 01/01/07) does not truly specify nor define adequate or reliable telecommunication facilities. Nevertheless, Measures and Compliance have been added. Operators would be required to have and provide upon request evidence and/or documentation of compliance. The coordination of such would take some effort.

COM-002-2: Communications and Coordination

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval

- CESDT did not provide measures for Requirements:
  - Requirement 1.2 as need to define requirement in such a manner that it is effectively measurable.
  - Requirement 2 requires additional defining of terms.

#### EOP-002-2: Capacity and Energy Emergencies

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- CESDT did not provide measures for Requirements:
  - 4 due to current wording is too broad and needs to be clarified
  - 5 due to the Requirement is not measurable as written.
  - 6 due to the Requirement is not measurable as written.
  - 7 due to need to define Requirement 6 first
  - 9 due to the Requirement is not measurable as written.
  - 9.1 due to the Applicability provisions do not include Load Serving Entities.
- National Grid recognizes that Measure M1 list examples of evidence. However it neglects the most important evidence that being the approved procedures giving authority to take actions as necessary. Procedures should be added.

#### EOP-003-1: Load Shedding Plans

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- CESDT did not provide measures for Requirements:
  - 1 due to need to improve wording
  - 3 due to need to more clearly define terms
  - 4 due to need to improve wording
  - 5 due to need to more clearly define terms
  - 6 due to requirement is not measurable as currently written
  - 7 due to this Requirement is covered by PRC-006-0, Requirement 1. Requirement should be present in a single Standard requirement not multiple Standards.
  - 8.2 due to need to improve wording.

#### EOP-004-2: Disturbance Reporting

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- CESDT did not provide measures for Requirements:
  - 2 due to need to define requirement in manner that is measurable
  - 3.2 due to missing reference forms
  - 4 due to belief that requirement is not appropriate

- 5 as this should be part of the Regional Delegation Agreement

EOP-006-1: Reliability Coordination - System Restoration

- Considered complete – submit to NERC Board of Trustees for approval and submittal to FERC

INT-001-2: Interchange Information

- Considered complete – submit to NERC Board of Trustees for approval and submittal to FERC

INT-003-2: Interchange Transaction Information

- Considered complete – submit to NERC Board of Trustees for approval and submittal to FERC

IRO-001-1: Reliability Coordination - Responsibilities and Authority

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- CESDT did not provide measures for Requirements:
  - 2 as current definition is too broad to measure effectively
  - 9 as current definition is too broad to measure effectively

IRO-002-1: Reliability Coordination – Facilities

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- CESDT did not provide measures for Requirements:
  - 3 as issue of which entities are subject to the Requirement
  - 5.1 is duplicate of IRO-005-2 Requirements 1 and 3
  - 5.2 as current definition is too broad to measure effectively
  - 6 is duplicate of IRO-005- 2 Requirements 1 through 5.

IRO-003-1: Reliability Coordination - Wide-Area View

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- CESDT did not provide measures for Requirements:

- 2 as essentially duplicate of IRO-005-2 Requirement 1

#### IRO-005-2: Reliability Coordination - Current Day Operations

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- CESDT did not provide measures for Requirements:
  - 3.1 as essentially same as Requirement 9
  - 3.3 as not practical to determine if all resources are available
  - 4.1 as essentially same as Requirement 1.4
  - 4.3 as covered by EOP-002-2
  - 5 as covered by Measure 3
  - 9.2 as essentially duplicate of TOP-003 Requirement 4
  - 10 as essentially duplicate of Requirement 4
  - 11.2 as performances to be measured are covered elsewhere in the Standards
  - 12.2 as essentially duplicate of TOP-005 Requirement 1
  - 13.1 due to the Reliability Coordinator can not ensure the required action
  - 16 as too vague to measure
  - 17 as essentially a duplicate of Requirement 3

#### PER-004-1: Reliability Coordination – Staffing

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- CESDT did not provide measures for Requirements:
  - 5 as definition is too vague to measure

#### PRC-001-1: System Protection Coordination

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- CESDT did not provide measures for Requirements:
  - 1 as further definition of Protection system required
  - 2 as Requirement requires clarification in determining equipment failure relationship to reliability performance
  - 4 due to conflict of what is being required versus actual operational practices
  - 5,6 and 7 as asking entities to determine or know how a change in their system configuration will impact a third party
- National Grid additional technical comments:

- In other cases National Grid does not agree with the CESDT that there are legitimate obstacles for writing Measures. For example they indicate with regard to Requirement 4 that a Measure cannot be written because coordination between TOs and GOs does not occur. This is precisely why there is a requirement and the TOs and GOs who are not coordinating protections had better do so. With regard to Requirements 5, 6, and 7 the CESDT indicates that a TO or GO cannot always know whether a change in their protection will affect another entity. In cases where they can not assess this on their own they need to verify this with neighboring entities.
- Recommend that Requirements reflect the need to coordinate actions between any entities that may be impact.

#### TOP-001-1: Reliability Responsibilities and Authority

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- CESDT did not provide measures for Requirements:
  - 8 due to additional explanation of reactive power balance is required
  - Should note that there is no Requirement 8 identified in TO-001-1
- National Grid’s additional technical comments:
  - Within Requirements 3 and 6, there needs to be a definition of what comprises emergency assistance. Without a standard definition there will always be problem with implementation and compliance measurements.

#### TOP-002-1: Normal Operations Planning

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- CESDT did not provide measures for Requirements:
  - 1.2 as wording of what is to be accomplished is too vague
  - 2 as wording is too vague for development of effective measures
  - 3 as wording is too vague for development of effective measures
  - 4 as wording is too vague for development of effective measures
  - 12 as Requirement is essentially duplicate of FAC-013
  - 13 as requirement is essentially duplicate of MOD-024 and MOD-025
  - 17 as Requirement is incorrectly written
  - 19 as wording of what is to be accomplished is too vague
- National Grid additional technical issues:
  - Related to Requirement 11.1 and Data Retention, in New England, the Control Center next-day and current-day studies are based on power flow cases which are based on forecasted (next-day) or actual (current-day) system conditions. The cases are not saved for more than a week. The saved cases are based on the current model. Essentially the model is saved with every case. Any changes to the model (addition of even a single element) would prevent the case from solving. The result is the cases

cannot be saved electronically with out considerable changes to the computerized Energy Management System. Providing a hard copy of past system conditions and studies could require producing an enormous amount of printed data.

#### TOP-004-1: Transmission Operations

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- CESDT did not provide measures for Requirements:
  - 1 as requires operates that are not always achievable
  - 2 as Requirement needs to be re-written to reflect measuring actions to prevent an incidence occurring
  - 5 as not possible to ensure Requirement is accomplished

#### TOP-006-1: Monitoring System Conditions

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- CESDT did not provide measures for Requirements:
  - 3 as Requirement needs to completely define the information and equipment involved
  - 6 as wording is too vague for development of effective measures

#### TOP-008-1: Response to Transmission Limit Violations

- NOT COMPLETE – additional revisions required – DO NOT submit to NERC Board of Trustees for approval
- CESDT did not provide measures for Requirements:
  - 2 as being asked to measure an indefinable occurrence
  - 4.2 as wording is too vague for development of effective measures

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<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> MRO	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory, or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA — Not Applicable		

## Comment Form for Compliance Elements

### Group Comments (Complete this page if comments are from a group.)

Group Name: **SCE&G ERO Working Group**  
 Lead Contact: Sally Ballentine Wofford  
 Contact Organization: South Carolina Electric & Gas Company  
 Contact Segment: Transmission  
 Contact Telephone: 803-217-9343  
 Contact E-mail: sbwofford@scana.com

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Lee Xanthakos	South Carolina Electric & Gas Co	SERC	1
Hubert C. Young	South Carolina Electric & Gas Co	SERC	3
Richard Jones	South Carolina Electric & Gas Co	SERC	5
Henry Delk	South Carolina Electric & Gas Co	SERC	
Jonh T. Blalock	South Carolina Electric & Gas Co	SERC	
Dan Goldston	South Carolina Electric & Gas Co	SERC	
Todd Johnson	South Carolina Electric & Gas Co	SERC	
Jay Hammond	South Carolina Electric & Gas Co	SERC	
Phil Kleckley	South Carolina Electric & Gas Co	SERC	
Pat Longshore	South Carolina Electric & Gas Co	SERC	
Simon Shealy	South Carolina Electric & Gas Co	SERC	
Bob Smith	South Carolina Electric & Gas Co	SERC	
Andy Bowden	South Carolina Electric & Gas Co	SERC	
Arnie Cribb	South Carolina Electric & Gas Co	SERC	
Marion Frick	South Carolina Electric & Gas Co	SERC	
Ernie Gibbons	South Carolina Electric & Gas Co	SERC	
Jerry Lindler	South Carolina Electric & Gas Co	SERC	
Wayne Stuart	South Carolina Electric & Gas Co	SERC	
Brad Stokes	South Carolina Electric & Gas Co	SERC	
Shawn McCarthy	South Carolina Electric & Gas Co	SERC	
Oscie Brown	South Carolina Electric & Gas Co	SERC	

\* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

## Comment Form for Compliance Elements

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Please Enter All Comments in Simple Text Format.

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

The implementation plan for this set of standards assumes that the set of standards will be approved by the stakeholders in October 2006 and by the NERC Board of Trustees in November 2006. The proposed effective date for all revisions would be January 1, 2007. The drafting team is recommending that the set of standards be balloted with a single ballot.

1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments:

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments: South Carolina Electric & Gas Company does not specifically disagree with any changes made in the measures and compliance elements.

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments: Although South Carolina Electric & Gas Company does not disagree specifically with any of the added compliance measures, we would like to take this opportunity to point out that good measures are of no consequence if the requirements to which a company is being measured against are so vague and non-specific that the requirement could be interpreted in many different ways by any number of auditors. Specifically we would like to request that Standards which use vague phrases such as "where applicable" and "adequate and reliable" be addressed. We realize that this drafting team is charged with only adding measures and compliance elements, but we would like to make the argument that sound, auditable compliance measures cannot be categorically separated from sound, specific requirements. Measures tie to and direct compliance with the requirements. You will not be successful in adding compliance measures until the requirements specifically state what will be measured.

## Comment Form for Compliance Elements

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### ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

- DO:**
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- Do not** insert tabs or paragraph returns in any data field.
  - Do not** use numbering or bullets in any data field.
  - Do not** use quotation marks in any data field.
  - Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	<b>William J. Smith</b>	
Organization:	<b>Allegheny Power</b>	
Telephone:	<b>(724) 838-6552</b>	
E-mail:	<b>wsmith1@alleghenypower.com</b>	
NERC Region	<input type="checkbox"/>	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input checked="" type="checkbox"/> ECAR	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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<input type="checkbox"/> MRO	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory, or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA — Not Applicable	<input type="checkbox"/>	



## Comment Form for Compliance Elements

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1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments:

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments: I do not disagree with the conforming changes.

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments: I have no additional comments relative to changes made to this set of standards.

## Comment Form for Compliance Elements

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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Jay Seitz
Organization:	U.S. Bureau of Reclamation
Telephone:	303.445.2844
E-mail:	jseitz@do.usbr.gov
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 — Load-serving Entities
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<input checked="" type="checkbox"/> WECC	
<input type="checkbox"/> NA — Not Applicable	



## Comment Form for Compliance Elements

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1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments:

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments:

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments: General Comments

In a number of these Standards the group charged with creating measures and compliance criteria have indicated that they could not determine what measures could be used for requirements or portions of requirements. In addition, in a number of cases the requirement was so broad or ill-defined as to preclude a measure being developed.

Serious consideration should be made to revisiting those requirements that cannot be measured to determined if they are a requirement that needs more definition, narrowing of scope or transfer to another standard. A number appear to be of a philosophical nature, expressing an intent that the other requirements are to deliver.

Title: Sabotage Reporting

Number: CIP-001-1

## Comment Form for Compliance Elements

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The term "sabotage" is used through out this Standard. Determination of "sabotage" implies that there is sufficient knowledge to determine that there is a "treacherous" or "enemy" agent involved in the event. It is more likely that the event will appear, to those affected by this standard, to be an act or interconnected acts of vandalism.

This then results in a meaningless standard, as it is unlikely that any organization that is not law enforcement or national security or intelligence related will be able to discern the difference between a vandalism event and a sabotage event. So the real emphasis should be on defining those acts of vandalism that need to be reported to the appropriate authorities for further action.

Or is it the intent, that all acts that cause damage or destruction of a power system component be classified as an ace of "sabotage." Thus vandalism is degraded to merely those acts that cause no damage or destruction, such as tagging with paint or blocking a access road.

Measure 3: Was there an oversight in requirement 4 to not include the participation of the Comision Federal de Electricidad (CFE) in the WECC? We recommend a reference be added including the appropriate Republic of Mexico counterpart for FBI and RCMP.

In addition the scope of this measure is not clear, is the intent to establish pre-emptive contacts with the FBI or RCMP? If it is important to have pre-established contacts then it follows that there should be a period of time over which the contact should be refreshed, e.g. three years.

Title: Communication and Coordination

Number: COM-002-2

Measure 1: Although a measure was not made for "Requirement 1 part 2," this requirement as written implies a 24/7 availability. For small generator operator/owners is not reasonable, nor are they likely to have a major impact on the system. In many instances small plants are not staffed or are not staffed 24/7. If the intent is to include all generation the measure is not practical.

Compliance 3.4: This compliance item as written, is acceptable. However if there is an implied 24/7 aspect to the item, then for certain generating facilities it is not practical or cost effective to meet this requirement.

Title: Reliability Coordination — Responsibilities and Authorities

Number: IRO-001-1

## Comment Form for Compliance Elements

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Measure 7: The measure (and Requirement 8) states “shall comply with Reliability Coordinator directives unless such actions would violate safety, equipment, or regulatory or statutory requirements.” We believe that a lack of fuel and or water for hydro should be an acceptable means of not being able to comply with a Reliability Coordinator directive.

Compliance 1.3: Third paragraph, the reference should be to Measure 7, not Measure 8.

Compliance 4: Levels of Non-Compliance for a Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, or Purchasing-Selling Entity:, 4.4 Level 4, 4.4.1 a lack of fuel and or water (fuel for hydro), or should be added to the list of an acceptable reasons of not being able to comply with a Reliability Coordinator directive.

Title: Reliability Coordination — Current Day Operations

Number: IRO-005-2

Although this Standard is shown as applying to Generator Operators, there are no Requirements, Measures or Compliance items that indicate a direct impact to Generator Operator. There are no compliance levels that apply to Generator Operators; all references are that there be coordination with Generation Operators.

Title: System Protection Coordination

Number: PRC-001-1

General There is a requirement, but no measure for a TO to coordinate with neighboring Generator Operators, but not with interconnected Generator Operators. Is the intent that changes to a line’s protection scheme do not have to be coordinated with an interconnected generator?

Measure 1: This measure and the associated requirements are too far reaching. The use of the term “all new protective systems and all protective system changes,” would require coordination of the changing of settings for the circuit breaker trip points for sump pumps, lighting circuits etc. This needs to narrow its scope to those associated with system protection schemes or devices directly affecting the system.

Compliance 2.4: The requirement to provide “evidence of coordination when installing new protective systems and all protective system changes” is too far reaching. This needs to narrow its scope to those associated with system protection schemes or devices directly affecting the system.

## Comment Form for Compliance Elements

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Compliance 3: A Transmission Operator could never coordinate with interconnected Generation Operator and there would be no compliance issues as these are written.

Compliance 3.4.2 and 4.4: Are the references to R8.1 and 8.2 obsolete?

Title: Reliability Responsibilities and Authorities

Number: TOP-001-1

Measures 3, 4 and 6 (and underlying Requirements) state "... did not comply with the directive because it would violate safety, equipment, regulatory or statutory requirements. . ." We believe that a lack of fuel and or water for hydro should be an acceptable means of not being able to comply with a directive. We also note that a full regulating reservoir would fall under the regulatory or statutory limits (i.e. no spilling except for flood control).

Measure 7 (and Requirement 7) We believe there are occasions for which the Transmission Operator should also inform the Generator Operator of events and outages. For instance a line section outage may require a change in a generator dropping scheme. The measure should reflect this two way need for information sharing.

The note following Measure 7 makes no sense as there is no "Requirement 8."

Compliance 4.4.2 as written, does not recognize the exceptions of the Requirement.

Compliance 4.4.3 refers to Requirements 7.1, 7.2 and 7.3. These do not exist in this document.

Title: Normal Operations Planning

Number: TOP-002-1

Measure 6: As stated this Measure and the underlying Requirement are too vague. Is the intent that for hydro generators a change in output due to reservoir fluctuation requires notification? If so there must be a defined value change that triggers a need for notification.

Compliance 4.4.1: The compliance level needs to recognize practical, defined changes in output values.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Paul Arnold	
Organization:	WECC/CCC	
Telephone:	360-260-3214	
E-mail:	pfavancouver@comcast.net	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory, or other Government Entities
<input type="checkbox"/> NA — Not Applicable		



## Comment Form for Compliance Elements

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1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments:

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments:

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments: I agree with the CCC Group comments except as noted below:

COM-002-2:

Failure to follow the communication procedures in Requirement 2 should result in a level 1 violation, unless the directive was not followed due to a communications problem. If, in addition to failing to use the required communications procedures, the directive was not followed, then failure to follow the procedures should result in a level 4 violation.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> WECC		
<input type="checkbox"/> NA — Not Applicable		

**Comment Form for Compliance Elements**

<b>Group Comments (Complete this page if comments are from a group.)</b>			
Group Name:	<b>Midwest Reliability Organization (MRO)</b>		
Lead Contact:	Joe Knight		
Contact Organization:	MRO		
Contact Segment:	2		
Contact Telephone:	651.855.1703		
Contact E-mail:	je.knight@midwestreliability.org		
<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Terry Bilke	MISO	MRO	2
Al Boesch	NPPD	MRO	2
Robert Coish	MHEB	MRO	2
Dennis Florum	LES	MRO	2
Ken Goldsmith	ALT	MRO	2
Todd Gosnell	OPPD	MRO	2
Wayne Guttormson	SPC	MRO	2
Jim Maenner	WPS	MRO	2
Darrick Moe, Chair	WAPA	MRO	2
Pam Oreschnick	XEL	MRO	2
Dave Rudolph	BEPC	MRO	2
Tom Mielnik	MEC	MRO	2
Dick Pursley	GRE	MRO	2
The 27 Additional MRO Member	Companies not named above	MRO	2

\* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

## Comment Form for Compliance Elements

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

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1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments:

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments: EOP-003-1----The MRO believes that compliance (Section D.2) should be to a Regional Loadshed plan.The Regional Entity should be responsible for coordinating the various regional studies and implementation guidelines to insure compliance with the NERC standards.

PER-004 The MRO Disagrees with the removal of Measure M1. If a Requirement is not measurable, we would agree that the standard should not include a corresponding Measure. In this instance, however, commenters stated that "this is a duplicate Requirement and that both the Requirement and Measure should be removed from the standard". While we would agree that duplicate Requirements should be avoided, it is beyond the scope of the current task. If measurable Measures can be composed for the existing Requirements they should be, regardless of the Requirements feasibility or duplicity. Standards PER-003 and PER-004 should be reworked in the future to fix the redundancy. For now a Measure bridging the two standards might be the best solution. Proposed measure: M1. Reliability Coordinator NERC certification shall be measured and enforced by the elements in Reliability Standard PER-003.

Compliance D2.4 the MRO recommends that 2.4.1 be classified as a Level 2 Non-Compliance and that 2.4.2 and 2.4.3 be classified as a Level 4 non-compliance.

TOP-002 A Measure was not developed for Requirement 13 because according to the CEDST "the Requirement is essentially duplicated in MOD-024 and MOD-025." The MRO would disagree with this assessment. MOD-024 and MOD-025 essentially list the key elements that the RRO must include in their procedures for verifying Generator Gross and Net Reactive and Real Power Capability. The 2 standards go on to state that the Generator Owner must follow the RRO's procedures. Requirement 12 of TOP-002 states that the Generator Owner must perform the fore mentioned procedures at the request of the Balancing Authority or the Transmission Operator, which is not a requirement in either MOD-024 or MOD-025. Furthermore, TOP-002 is applicable to Generator Operator whereas MOD-024 and MOD-025 are applicable

## Comment Form for Compliance Elements

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to the Generator Owner. The MRO recommends the CEDST develop a Measure for Requirement 13.

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments:

INT-001 Compliance D.1.2 change "twelve" to "12" for consistency with the other standards.

Compliance D.2. change "Levels of Non-Compliance for Balancing Authorities" to "Levels of Non-Compliance for Sink Balancing Authorities"

INT-003 Measures C.M1 change "energy profile, were confirmed" to "energy profile, was confirmed"

Compliance D.1.3 change "shall each keep" to "shall keep"

Compliance D.2.3 change "separate Level 3 non-compliance, for everyone of the following" to "separate Level 3 non-compliance, if either of the following"

Compliance D.2.4.1 change "Three" to "Four or more"

Compliance D.2.4.2 change "Three" to "Four or more"

PER-004 Compliance D2.4 change "for every one of the following requirements that is in violation" to "if either of the following conditions exist"

General comment on PER-004: Requirements 2, 3, 4 and 5 are all vague and difficult to measure. We understand that changing requirements is beyond the scope of this drafting team and therefore support the measures M1 and M2 as written, though PER-004 should be reworked in the future to include measurable requirements.

TOP-001 M4. Change "it immediately informed the Reliability Coordinator of its inability to perform the directive." To "it immediately informed the Transmission Operator of its inability to perform the directive.

Data Retention 1.3 Second paragraph. Change "Each Transmission Operator, keep 90 days of historical data (evidence) for Measures 1 through 7, including evidence of directives issued for Measure 4." TO "Each Transmission Operator shall keep 90 days of historical data (evidence) for Measures 1 through 7, including the issued directives for Measures 3 and 4."

Data Retention 1.3 Third paragraph. Change "Each Balancing Authority shall keep 90 days of historical data (evidence) for Measures 3,4,and 6." TO "Each Balancing Authority shall keep 90 days of historical data (evidence) for Measures 3,4,and 6, including evidence of issued directives for measures 3 and 4.

Data Retention 1.3 Forth paragraph. Change "Each Generator Operator shall keep 90 days of historical data (evidence) for Measures 3,4,6, and 7." TO "Each Generator

## Comment Form for Compliance Elements

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Operator shall keep 90 days of historical data (evidence) for Measures 3,4,6, and 7, including evidence of issued directives for measures 3 and 4.

Data Retention 1.3 Fifth paragraph. Change "Each Distribution Provider and Load-serving Entity shall keep 90 days of historical data (evidence) for Measures 4." TO "Each Distribution Provider and Load-serving Entity shall keep 90 days of historical data (evidence) and evidence of issued directives for Measure 4."

TOP-002 Data Retention 1.3. Transmission Operator is grouped in with the Balancing Authority in regards to Measures 1,2,3, when in fact Measure 3 is only applicable to Balancing Authorities.

The levels of Noncompliance for Load Serving entities should not be removed as they are a part of the Requirements and The Measures.

TOP-006 Reliability Coordinator should be added to Measure 4, and Data Retention 1.3 should also be changed to reflect this addition.

Recommend changing Level 4 Non-Compliance for Generators Operators to a Level 2. The level states "Did not inform its Host Balancing Authority and/or the Transmission Operator of all generation resources available for use (R1.1)" This is not seen as a major violation because this is often a joint effort between the Balancing Authorities and the Generator Operators. Furthermore, though beyond the scope of this drafting team, it would seem appropriate to identify a minimum size in Requirement 1.1. As the requirement stands now, even generators less than 1 MW would be required to continually report their status to the BA.

### General Comments

Throughout the Measures and Compliance section of these standards, the Requirements are referenced as "Requirement 1", "Requirement R1" and just "R1". Furthermore, in INT-001-2 in both the Measures section and the Levels of Non-Compliance section Requirement 2 is referenced as its subsections R2.1 and R2.2, whereas Requirement 1 is referenced only as R1 rather than its subsection R1.1. We would recommend the CESDT work out a consistent naming convention and apply it to all of the 20 standards currently being worked on.

As more Measures and more Levels of Non Compliance continue to get added to the NERC Version Zero standards the standards are becoming increasingly harder to follow. It would seem more intuitive to list a single Requirement followed by its corresponding Measure and Level of Non-Compliance. This would eliminate the need to essentially restate the Requirement in the Measure and in the Levels of Non-Compliance sections as is currently the case. This would decrease the size of the standard while increasing its readability.

## Comment Form for Compliance Elements

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Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
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## Comment Form for Compliance Elements

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The implementation plan for this set of standards assumes that the set of standards will be approved by the stakeholders in October 2006 and by the NERC Board of Trustees in November 2006. The proposed effective date for all revisions would be January 1, 2007. The drafting team is recommending that the set of standards be balloted with a single ballot.

1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments:

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments:

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments:

Below are specific comments on the standards the CCC has identified where some additional work, clarification, or correction is needed.

Overall:

The CCC notes that the CESDT used the Level 1-4 nomenclature to identify the severity of the violation. The CCC believes that these levels should be replaced with the names Lower, Moderate, High, and Severe, which are identified in the Sanction Guidelines document. This change could either be applied here with adoption in other standards as they move through their five year review procedures, or it could be done as a technical edit and applied to all standards simultaneously.

**CIP-001-1:**

The CCC agrees with the measures as written, but believes that the levels of noncompliance are not appropriate for Yes/No requirements. Items listed in sections 2.2.1, 2.1.2, 2.1.3, and 2.3 should all be level 4 (severe) violations. The rationale is that these requirements are either met or they are not. If they are met, they are in compliance. If the requirements are not met, they missed them completely and there is no possibility to partially meet the requirement. Since levels are based on how badly they missed the requirement, this should then be a level 4 (severe).

**COM-002-2:**

The CCC agrees with the CESDT and believes that the requirement needs to be reworded in order to create a valid measurement.

Additionally, the CCC believes that Requirement 2 can also be measured. Potential wording could be: *“Each Transmission Operator, Balancing Authority, and Reliability Coordinator shall provide evidence that could include, but is not limited to, voice recordings or other equivalent evidence that can be used to determine if the Reliability Coordinator, Transmission Operator, or Balancing Authority uses the issue, repeat and confirm method of communication described in Requirement 2 when issuing directives.”*

Failure to follow the communication procedures in Requirement 2 should result in a level 4 (severe) violation consistent with the comment on CIP-001-1.

**EOP-002-2:**

In the levels of noncompliance (3.3) there is no subset of violations for level 3 (high) as the description implies there would be.

Requirement 3.2 should be a level 4 (severe) as it is a yes/no requirement.

**EOP-003-1:**

The CCC agrees with the CESDT and believes that the requirement needs to be reworded or enhanced in order to create a valid measurement.

**EOP-004-2:**

The CCC believes that a measurement can be written for Requirement 5. A possible wording could read:

Part 1:

*“The RRO shall provide evidence they track the status of all final report recommendations twice each year.”*

Part 2:

*“The RRO shall provide evidence that any recommendation older than 2 years has been brought to the PC and/or the OC and shall provide all a list of steps taken to accelerate implementation of the recommendations.”*

The CCC, understanding that modifications to the standard is beyond the scope of the CESDT, believes the requirement needs to be brought to the attention of the SC. This requirement needs to be reworded regarding bringing the issue to the PC and the OC, and that it changed to the appropriate entity.

Violating part 1 should be a level 3 (high) violation. Violating part 2 should be a level 1 (lower) violation, violating both should be a level 4 (severe) violation.

**EOP-006-1:**

The CCC noticed that in section 2.3 the CESDT mentions a level 4 (severe) noncompliance in the text that lies under the level 3 (high) section. This needs to be corrected.

**IRO-002-1:**

The CCC believes that the level of noncompliance for section 2.1 should be a level 4 (severe). In addition, in section 2.3 the exercising of final approvals for planned maintenance is in Requirement 9, not Requirement 7 and the CCC respectfully requests the drafting team review these requirements.

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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Jason Shaver	
Organization:	American Transmission Company	
Telephone:	262 506 6885	
E-mail:	jshaver@atcillc.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
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The implementation plan for this set of standards assumes that the set of standards will be approved by the stakeholders in October 2006 and by the NERC Board of Trustees in November 2006. The proposed effective date for all revisions would be January 1, 2007. The drafting team is recommending that the set of standards be balloted with a single ballot.

1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments: ATC does not agree with the short implementation plan. Although these standards have been in place for some time the measure are new and will take time for an entity to become auditable compliant. Based on the large number of new measures the industry should be allowed a minimum of nine months before the standards take effect.

As with our earlier comments NERC should follow the approved SAR, which allowed for the development of measures for these twenty standards over a four year period.

It seems that with this set of standards both the SAC and the SDT is being allowed to determine their own Standards Process rules. The original SAR that was accepted had a four year process for development and that was changed to a 9 month process for all twenty standards. In addition, the SDT was allowed to change the requirements in one standard and not in others. (See IRO-005 Question 3) ATC is concerned that the SDT is not holding itself to the approved SAR.

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments: PRC-001-1 (Measure M1)

The requirement for this measure is too broad and needs to be clearly defined. The requirement would require entities to coordinate all new protective systems and changes to existing protective system even if they do not have an impact on neighboring Transmission Operators and Balancing Authorities.

This requirement makes not distinction from protection work being performed on a radial line from work on a interconnection line.

Because of this concern ATC requests that the SDT follow find these requirement as being to broad to write a meaningful measure.

## Comment Form for Compliance Elements

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If you choose not to remove the requirement please identify which protective systems need to be coordinated and which do not.

TOP-001-1 (Measure M1)

By the way this measure is written it seems that the requirement is a duplicate of PER-001-0 requirement 1. Standard PER-001-0 requirement one states that operating personal must have "authority to implement real-time actions to ensure the stable and reliable operations of the Bulk Electric System". To demonstrate requirement one in PER-001-0 the entity has to have a "written current job description that states operating personnel are responsible for complying with NERC reliability standards."

PER-001-0 seems to do what the SDT wants from TOP-001-1. Since PER-001-0 is a duplicate requirement ATC recommends that this measure be deleted.

Please provide clarification of the two requirements if you disagree with our interpretation of the two requirements.

ATC also requests that the SDT provide detail information on what constitutes a "clear decision-making authority".

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments: The SDT has been given the authority to change some requirements. (see the red line version of Standards IRO-005-2 requirements 2, 12 and 15) These three requirements were changed by the SDT to clarify the requirement. Why this standard and these three requirements?

A review of these 20 standards shows that many requirements are either duplicative or too broad to write a meaningful measure. ATC believes that this effort should be scrapped for a replacement effort that would look at each of these standards completely. To quickly fill in the measures and compliance section without being allowed to also adjust the requirements is just delaying the overall improvement of each standard.

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1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments:

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments:

COM-001-1 - Telecommunications

NERC should be removed as a compliance monitor. We commented on this in the previous draft and the SDT said they agreed. Looks like it was left in error.

EOP-002-2 - Capacity and Energy Emergencies

In M4, should change "has been notified of" to "that has notified the RC of". It is the BA that is doing the notification, not the RC.

For Level 3 non-compliance it appears that there are words missing as there is nothing after the colon. This needs to be corrected.

EOP-004-2 - Disturbance Reporting

The starting point for these changes was EOP-004-1 which was balloted several times and never achieved quorum. The CESDT needs to go back to version 0 and make the appropriate revisions as those contemplated in version 1 were never approved.

EOP-006-1 -Reliability Coordination - System Restoration

We agree with the addition of M6, but question the inclusion of system restoration plan as evidence. It is supposed to measure that it implemented its plan, not that it had one. We suggest removing that piece of evidence.

INT-003-2 - Interchange Transaction Implementation

For the Level 4 non-compliance it sites "three instances of..". Should this be "four"? Also the numbering seems to be incorrect.

IRO-002-1 - Reliability Coordination - Facilities

## Comment Form for Compliance Elements

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The numbering of the measures needs to be corrected. We do not agree with 2.1 - Level 1 Non-compliance. We believe that R2 is the same importance as R9 and both should be a level 3.

PER-004-1 - Reliability Coordination - Staffing

The CESDT note under C. Measures indicates that Requirement 1 was eliminated. It should either refer to Measure 1.

PRC-001-1 - System Protection Coordination

In 3.4.1 Level of Non-Compliance, should say "neighboring Transmission Operator" rather than "its Transmission Operator".

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments:

The FRCC is very concerned with the number of Requirements in these Reliability Standards that Measures were not able to be written for due to poorly written Requirements. How will the CESDT transfer their concern with these requirements to the Standards Process? Will the CESDT provide SAR's recommending change? We wonder how will FERC adopt these standards that still have missing Measures. In many cases, all, of the Requirements of the Reliability Standard are necessary for the standard to be effective for promoting reliability.

If the plan is to submit these to FERC for conditional approval, expecting FERC to provide instruction to NERC to start a process to rewrite the Requirements and develop Measures as needed to complete the standards, the FRCC would be able to support balloting at this time.

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(Complete this page for comments from one organization or individual.)		
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Organization:	Hydro One Inc	
Telephone:	416 3455420	
E-mail:	ajay.garg@hydroone.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments: I agree with the plan to have the effective date of Jan 1, 2007 subject to the fact that standards have gone through the established NERC process. However, from a fundamental principle point I do not support a single ballot for a set of standards.

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments:

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments: Again, if this is the case we should ballot each of the standards on its own merit and completeness. The balloting schedule for each one of them can be same.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments: There are many elements that we do not agree with. These elements are provided in detail below. In essence, we do not believe the process takes into account the quality and effectiveness of standard development. The 20 standards still have a large number of requirements not having compliance measures, hence quite a bit work is still required to refine the requirements and develop appropriate measures before they can be regarded complete, measurable and enforceable.

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments:

A: Measures

(1) EOP-003-1: It is appropriate that M1 asks for a BA to demonstrate its automatic load shedding plans. However, we suggest the wording be changed to "Each Transmission Operator and Balancing Authority that has or directs the deployment of undervoltage and/or underfrequency." since the BA doesn't normally own these facilities. Load shedding capability is usually arranged through deployment authority/agreements with the Distribution Provider.

(2) IRO-003-2: We do not agree that training modules should be included as evidence that the RC monitors system condition and is able to determine any actual or potential SOL or IROL violations. System operators may be trained to perform the monitoring task but absent the essential facilities and track record of actual monitoring, whether or not the trained personnel has performed this task is questionable.

(3) IRO-005-2:

(a) M1: We do not agree with inclusion of training module as evidence that the RC monitors its RC area in accordance with R1.1 through R1.9.

(b) M11: We do not agree with inclusion of training modules and training records as evidence that the RC is aware of SPS being armed and its impact on the system.

(c) GOP, LSE and PSE were removed from M12 with the rationale that this standard was not applicable to them. Yet R13 still holds these entities responsible to operate

## Comment Form for Compliance Elements

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to the most limiting parameter, and the Applicability Section has these entities added in anticipation of a change in the next standard revision. There seems to be a misalignment among Applicability, Requirements and Measures.

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B: Retention Requirements:

(1) COM-001-1: The response indicates that evidence for only M1 needs to be retained for current year plus 2 years. However, the redline version has both M1 and M3 having this requirement.

(2) IRO-001-1: We believe the 90-day historical data retention requirement applies to M7, not M8, as the latter does not exist.

C. Non-Compliance

(1) COM-001: The IESO continues to disagree with the lack of measure and non-compliance level for not having communication facilities in place. The CESDT's response that "...the essential requirement to have the facilities in place is duplicated in COM-002 R1 and the failure to have the facilities is a level four." does not really address this. COM-002 R1 stipulates the requirements for TOP, BA and GOP to have communications (voice and data link), which could be interpreted as the facilities, with the RC, but does not stipulate the same requirement for the RC. Hence, the Level 4 in COM-002 would not apply to an RC even if it does not have any telecommunication facilities. On the other hand, R1 in COM-001 clearly stipulates that RC, TOP and BA shall have adequate and reliable telecommunication facilities. We still feel it necessary that in COM-001, a Level 4 should be assigned for not meeting R1, namely, having the telecommunication facilities.

(2) EOP-006-1: Level 2.3 should read "...a separate Level 3 non-compliance, for every one.."

(3) INT-003-1: We are unable to make a difference between "for every one of" in 2.3 and "either of" in 2.4 for Level 3 and Level 4 non-compliance, respectively. On the surface, they both involve 3 occurrences of either (i) not entering a schedule into the ACE equation or (ii) not coordinating interchange schedule with the TOP of HVDC tie.

(4) PRC-004-1: See our comments on M3 for R3 and R4. If M3 is removed, Level 2.4.2 and 2.4.3 should be removed accordingly.

D. Not Providing Measures for Some Requirements

(1) We are disappointed that the CESDT continues to state that making requirement changes is outside of its scope. We understand this is the current restriction, and may even be beyond the CESDT's ability to propose a change to this process. We will seek other avenue to convey our concern over this restriction, which in our view will severely hamper the effective development of quality and complete standards without repetitive work.

(2) EOP-004-2: We requested that a measure be developed for R5 but the CESDT felt that providing a measure for this requirement would not be appropriate because

## Comment Form for Compliance Elements

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this will be addressed through Regional Delegation. But if this is the rationale, shouldn't most of the measures on RRO's compliance be addressed in the Delegation Agreement? Yet there are a number of measures already developed and included in the standards themselves, for example: M1 of EOP-004, M1 of IRO-001. Please elaborate if we are missing something behind this rationale.

(3) IRO-005-2:

(a) In response to our first comment on the previous draft, the CESDT holds the opinion that R9 Part 2 is essentially covered in TOP-003 R4. R9 Part 2 states "The Reliability Coordinator shall coordinate pending generation and transmission maintenance outages with Transmission; whereas TOP-003 R4 states "Each Reliability Coordinator shall resolve any scheduling of potential reliability conflicts." We do not see "coordinating pending generation and transmission maintenance outages" in the former requirement is necessarily covered by "resolve any scheduling of potential reliability conflicts" in the latter. We would suspect that it would normally be through the act of coordination to discover or identify any potential reliability conflicts. Not having a measure for R2 Part 9 leaves the act to coordinate not measured.

(b) In response to our fourth comment, CESDT holds the opinion that while it agrees that R12 Part 2 is not explicitly covered, it is essentially covered and would be caught by the TOP-005 R1 requirement. We do not agree with this assessment. R12 Part 2 states "The Transmission Operator shall immediately inform the Reliability Coordinator of the status of the Special Protection System including any degradation or potential failure to operate as expected"; whereas TOP-005 R1 stipulates that "Each Transmission Operator and Balancing Authority shall provide its Reliability Coordinator with the operating data that the Reliability Coordinator requires to coordinate reliable operations within the Reliability Coordinator Area. We do not see how operating data required in the latter would necessarily be interpreted by all that it includes SPS status and assessed potential degradation in the former. We are afraid that without a measure, SPS status including potential degradation may not be reported, leaving a reliability gap in this aspect - the looseness that we believe is one of FERC's concerns with many of the existing standards.

(c) The CESDT has consistently stated that changing requirements is outside of its scope. However, we noticed that a number of changes have been made to R7, R9, R11, R12 and R15. We cannot find any notes associated with these changes and hence wonder what process did the CESDT go through to made these changes. And if the CESDT can make these changes, why would other suggested requirement changes not be taken. Please clarify.

### D. Other Comments

(1) We are curious as to why our message on CESDT not having the ability to change requirements was forwarded to NERC staff but not the CCC or SAC. These two Committees are the oversight authorities for standard and compliance measures development.

(2) In response to our question on why the SAR said staged implementation but the actual posting of the draft standards actually presents missing measures and compliance elements for 20 standards, the CESDT indicates that the comments was noted and forwarded to NERC. We are not sure which body in NERC the CESDT referred to. Again, we feel strongly that it is the SAC's and CCC's responsibility to oversee the scope, appropriateness and effectiveness of standard development, not NERC staff or the Standard Process Manager.

## Comment Form for Compliance Elements

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(3) In response to our comments on several standards, e.g. EOP-004, EOP-006, etc. under Q5, the CESDT states that focusing on the SAR can ensure that the drafting teams cannot have "scope creep". Yet in responding to our question on why the SAR said staged development of missing measures but the actual posting put out measures for all 20 standards, the CESDT held the view that "by expediting the development of the missing compliance elements from five years to one year could provide clarity to the industry as to what needs to be measured. While we applaud the CESDT's efficiency, did this decision go beyond the scope of the final SAR, and hence itself a "scope creep", and lend itself to the speculation of different philosophy, if not double standard, being applied?

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments:

The IESO does not believe that this set of standards is ready to move forward to balloting. While we understand the CESDT's ability to make changes has been restricted by the scope of the SAR, we are very uncomfortable with endorsing these standards for the following reasons:

- a. There are known deficiencies (which the CESDT admits) in the existing requirements for which measures cannot be developed,
- b. There are still a large number of missing measures owing to much more work is needed to refine the requirements,
- c. There are overlaps among several related standards for which measures are provided in one standard but not in the others. It makes measuring compliance with standards very cumbersome, if not difficult. The standards need to be fixed to properly align with measures.

The IESO is very concerned with the apparent push to provide partial measures to the 20 standards without truly refining the standards and providing the full set of measures, just for the sake of following the scope of the SAR and completing the process. By doing so, the industry is handed a set of standards that does not meet one of the fundamental principles for reliability standards: that a standard must be measurable and its compliance enforceable. We are very disappointed with the authorities' (don't know exactly who, though) decision to continue to march forward on this ill-fated route.

In brief, the IESO does not support putting the standards out for ballot. If these standards were to be balloted without a wholesale review and changes, the IESO will most probably vote NO, with regrets.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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## Comment Form for Compliance Elements

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Please Enter All Comments in Simple Text Format.

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1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments: There are many elements that we do not agree with. These elements are provided in detail below. In essence, we do not believe the process takes into account the quality and effectiveness of standard development. The 20 standards still have a large number of requirements not having compliance measures, hence quite a bit of work is still required to refine the requirements and develop appropriate measures before they can be regarded complete, measurable and enforceable.

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Kathleen Goodman	
Organization:	ISO New England	
Telephone:	(413) 535-4111	
E-mail:	kgoodman@iso-ne.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> MRO	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	7 — Large Electricity End Users
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<input type="checkbox"/> WECC		
<input type="checkbox"/> NA — Not Applicable		



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1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments: Because changes are needed to the requirements themselves to meet the statutory requirements, ISO New England recommends that the drafting team recall this work and individual teams be formed to address each standard that has missing compliance elements because a single drafting team approach is no longer appropriate since NERC should provide a targeted technical focus to each individual standard, thereby requiring individual or at most multiple drafting teams.

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments:

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments: We are not prepared to vote to approve these Standards until many of the inherent flaws within the individual standards themselves (i.e. the requirements and measures) are addressed as well as compliance assessment.

The PRC standard does not have appropriate measures and also there is an issue with the timeframe: FERC staff criticized PRC-001-0 for not specifying a time frame for the TO/GO to take corrective actions if there are relay failures that affect reliability. This has not been addressed in the latest draft.

A related proposed rule would extend the existing requirement for retaining records from the current three years to five years, to match the five-year statute of limitations under the Commission's civil penalty authority. Comments on this proposal will be due 30 days after the notice of proposed rule is published in the Federal Register. Feb. 16, 2006. Therefore, it is premature to even contemplate a vote on Standards that contain potentially conflicting retention requirements.

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Organization:		
Telephone:		
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NERC Region	<input type="checkbox"/>	<b>Registered Ballot Body Segment</b>
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Comments:

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments: We understand that the drafting team's scope is the Measures. We request clarification and or definitions of the following terms in the COM-001 Requirements:

- From R1, adequate and reliable
- From R2, special attention
- From R2, emergency telecommunications facilities
- From R3, means to coordinate

The CESDT states in the (COM-001 and COM-002) Measures that they have not developed Measures for a Requirement or part of a Requirement. Are these open items? The CESDT appears to agree with our request for clarification or definition of "special attention" in R2 (COM-001). These CESDT comments imply the Requirements need work. Is the CESDT suggesting or asking if the Requirements need work?

While we expect to be fully compliant (for COM-001 and COM-002) by the proposed effective date, based on our interpretation of this update. We nonetheless expect another draft which clarifies open items from us and the drafting team. This expectation assumes that the Functional Model Entities have not changed.

The proposed (COM-001 and COM-002) Measures include the phrase "upon request." We request clarification of "upon request."

COM-001, M4 seems to be a repeat of M2. Should one be removed? M4 is a measure of the NERCnet Security Policy (Attachment 1). Attachment 1 has great detail. M4 is very high level. This appears to be a conflict. We question the M4's value it provides

## Comment Form for Compliance Elements

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the auditors with huge volume of information that the auditors will need to review to determine if the NERCnet Security Policy was violated.

The proposed (COM-001 and COM-002) Measures imply keeping records. Since no data retention period is specified, someone could be found non-compliant for not keeping records an unreasonable length of time. We suggest that the Standard should specify the data retention period(s), or there should be a Requirement about documenting one's retention period.

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments: We are not prepared to vote to approve these Standards until all of the Measures are explicitly stated.

The PRC standard does not have appropriate measures and also there is an issue with the timeframe: FERC staff criticized PRC-001-0 for not specifying a time frame for the TO/GO to take corrective actions if there are relay failures that affect reliability. This has not been addressed in the latest draft.

In addition, I don't think the data retention period is correct since FERC has already specified 5 years to be consistent with the following:

A related proposed rule would extend the existing requirement for retaining records from the current three years to five years, to match the five-year statute of limitations under the Commission's civil penalty authority. Comments on this proposal will be due 30 days after the notice of proposed rule is published in the Federal Register. Feb. 16, 2006.

## Comment Form for Compliance Elements

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(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> MRO	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
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<input type="checkbox"/> SPP	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory, or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA — Not Applicable		



## Comment Form for Compliance Elements

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The implementation plan for this set of standards assumes that the set of standards will be approved by the stakeholders in October 2006 and by the NERC Board of Trustees in November 2006. The proposed effective date for all revisions would be January 1, 2007. The drafting team is recommending that the set of standards be balloted with a single ballot.

1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments:

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments: PHI agrees with the conforming changes, but recognizes such changes are beyond the scope of the CESDT.

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments: CIP-001-0 R1: CESDT has removed the reference to -for the recognition of- since this phrase was determined to be un-measurable, and its removal from the measure was not detrimental to the requirement. PHI disagrees with -was not detrimental to the requirement-. CIP-001 R1 is similar to CIP-008-1 R1. The measure for CIP-008-1 R1 states: M1. The Cyber Security Incident response plan as indicated in R1 and documentation of the review, updating, and testing of the plan... Also, unlike the measures for CIP-002-1 through CIP-009-1, the measures for CIP-001 include the Functional Model entities listed in the requirement. PHI recommends that going forward, each requirement and measure list the applicable Functional Model entities. PHI also recommends that going forward, each requirement have a similarly numbered measure (e.g. M5 relates to R5). These really are long-term issues, given the number of issues with the requirements that have been noted by the CESDT. There are several typos or misspellings in the listed standards, at least in the red-lined version.

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1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments: The PSCSC notes progress in completing missing measures, but also notes a significant number yet to be developed. If these standards come to a vote, the PSCSC will strongly consider a "NO" vote due to standards lacking complete requirements and associated performance measures unless there is a specific accompanying action plan to develop the missing information.

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments:

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments:

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Telephone:		
E-mail:		
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<input type="checkbox"/> WECC		
<input type="checkbox"/> NA — Not Applicable		

## Comment Form for Compliance Elements

### Group Comments (Complete this page if comments are from a group.)

Group Name: **SCE&G ERO Working Group**  
 Lead Contact: Sally Ballentine Wofford  
 Contact Organization: South Carolina Electric & Gas Company  
 Contact Segment: Transmission  
 Contact Telephone: 803-217-9343  
 Contact E-mail: sbwofford@scana.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Lee Xanthakos	South Carolina Electric & Gas Co	SERC	1
Hubert C. Young	South Carolina Electric & Gas Co	SERC	3
Richard Jones	South Carolina Electric & Gas Co	SERC	5
Henry Delk	South Carolina Electric & Gas Co	SERC	
Jonh T. Blalock	South Carolina Electric & Gas Co	SERC	
Dan Goldston	South Carolina Electric & Gas Co	SERC	
Todd Johnson	South Carolina Electric & Gas Co	SERC	
Jay Hammond	South Carolina Electric & Gas Co	SERC	
Phil Kleckley	South Carolina Electric & Gas Co	SERC	
Pat Longshore	South Carolina Electric & Gas Co	SERC	
Simon Shealy	South Carolina Electric & Gas Co	SERC	
Bob Smith	South Carolina Electric & Gas Co	SERC	
Andy Bowden	South Carolina Electric & Gas Co	SERC	
Arnie Cribb	South Carolina Electric & Gas Co	SERC	
Marion Frick	South Carolina Electric & Gas Co	SERC	
Ernie Gibbons	South Carolina Electric & Gas Co	SERC	
Jerry Lindler	South Carolina Electric & Gas Co	SERC	
Wayne Stuart	South Carolina Electric & Gas Co	SERC	
Brad Stokes	South Carolina Electric & Gas Co	SERC	
Shawn McCarthy	South Carolina Electric & Gas Co	SERC	
Oscie Brown	South Carolina Electric & Gas Co	SERC	

\* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments:

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments: South Carolina Electric & Gas Company does not specifically disagree with any changes made in the measures and compliance elements.

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments: Although South Carolina Electric & Gas Company does not disagree specifically with any of the added compliance measures, we would like to take this opportunity to point out that good measures are of no consequence if the requirements to which a company is being measured against are so vague and non-specific that the requirement could be interpreted in many different ways by any number of auditors. Specifically we would like to request that Standards which use vague phrases such as "where applicable" and "adequate and reliable" be addressed. We realize that this drafting team is charged with only adding measures and compliance elements, but we would like to make the argument that sound, auditable compliance measures cannot be categorically separated from sound, specific requirements. Measures tie to and direct compliance with the requirements. You will not be successful in adding compliance measures until the requirements specifically state what will be measured.

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<input type="checkbox"/> NA — Not Applicable		

**Comment Form for Compliance Elements**

**Group Comments (Complete this page if comments are from a group.)**

Group Name: **Southern Company**

Lead Contact: J T Wood

Contact Organization: Southern Company Services

Contact Segment: 1

Contact Telephone: 205-257-6238

Contact E-mail: jtwood@southernco.com

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Keith Calhoun	Southern Company Services	SERC	1
Raymond Vice	Southern Company Services	SERC	1
Roman Carter	Southern Company Services	SERC	1
Marc Butts	Southern Company Services	SERC	1
Mike Oatts	Southern Company Services	SERC	1
Jim Busbin	Southern Company Services	SERC	1
Dan Baisden	Southern Company Services	SERC	1
Terry Crawley	Southern Company Services	SERC	5
Tom Higgins	Southern Company Services	SERC	5
Doug Mclaughlin	Southern Company Services	SERC	1

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1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments:

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments: CIP001 M1 Change wording (...sabotage affecting larger portions of the ... to ... sabotage affecting wide area of the ... ). Wide area is defined in the NERC glossary.

INT-001-2: Language needs to be consistent throughout standard. At times the LSE/PSE and Sink BA is used together and at other times just the PSE and BA is used together.

INT-001-2: M2 – Change "operator lots" to "operator logs".

INT-003-2-(2.4.1) Level 4: This may be a typo, but the standard says three violations would result in a Level 4 non-compliance. Which is the same number of violations as a Level 3. Suggestion: Make Level 4 violations the same as in INT-001-2.

IRO-001-1 D.1.3 paragraph 3 measure 8 should be measure 7 due to renumbering

IRO-002-1 – M5, M6 and M7 need to be renumbered

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments: COM-001-1: Data Retention – The drafting team should consider making the data retention for M1 and M3 consistent with the other standards being reviewed for this effort. Rather than "two current years plus the current year" (which seems excessive for these measurements) use something like "most recent or current

## Comment Form for Compliance Elements

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documentation" for M1 and "current, in-force documents" for M3 (similar to words used in IRO-001 for data retention for M2 through M6).

COM-002-2: M2 – This measure uses terms of R1.1 that leave it ambiguous and, in fact, would require additional evidence not indicated to prove that compliance was achieved. The R1.1 and M2 are trying to require and assess compliance whether an RC was "notified" if a condition "could" threaten reliability. The pre-requisite determination of notification is what conditions "could" threaten reliability. In order to determine if a BA and TOP complied on all events/conditions the "could" one must first determine which conditions warrant such notifications and which ones don't. To audit this measure, it appears the BA and TOP would also have to keep documentation for all potentially threatening conditions and evidence why it considered them threatening or not. This retention is not evident nor required by the Measurement. Without this information what conditions would be audited for the notification compliance? In addition, is the judgment of the BA and/or TOP acceptable as to what conditions "could" require notification to the RC? If not, what other corroborating evidence from other entities is required for this Measurement? Perhaps R1.1 should not be given a measure like was done for R 2 until these issues are clarified as well. Data Retention – The drafting team should consider making the data retention for M1 consistent with the other standards being reviewed for this effort. Rather than "two current years plus the current year" (which seems excessive for these measurements) use something like "current, in-force documents" for M1 (similar to words used in IRO-001 for data retention for M2 through M6).

EOP-002-2: M2 – The drafting team should consider removing the Measurement for Req. 2 because the term "acceptable" is too broad just as the term "all actions" for Req. 4 was considered too broad and thus no measurement was developed. For example, does "acceptable" mean "in compliance with the Emergency Plan" or does it mean "successful in addressing the Capacity or Energy Emergency?"

INT-001-2-(D2. Non-Compliance): Not sure if non-compliance levels cover this situation. For example, consider a dynamic schedule that should run 09:00-15:00 Monday through Friday. There are generally two ways that an entity might schedule this interchange. The entity may submit one schedule to run for 5 days or submit a schedule for each day of the week. If the entity does not submit a schedule (arranged interchange) to the IA, then is this considered (after-the-fact) a Level1 or a Level4 violation?

????????INT-003-2-C-M1: See note from DWB: INT-001-2 above about using "NET" interchange.

IRO-002-1 – M1 – The drafting team should consider removing the Measurements for Req. 1 and 4 because the term "adequate" is too broad. For example, does "adequate" mean "it has land-line telephones with cell phone back-up" or does it mean "satellite phones are available in the event normal telecommunications infrastructure is non-functional"?

IRO-002-1 – M2 – The drafting team should consider if it should remove the Measurements for Req. 1 and 4 because the term "appropriate" is too broad. For example, does "appropriate" mean "it has established a data link" or does it mean the data link has a minimum frequency of exchange rate and/or minimum capacity value?

IRO-002-1 – M4 – Where did "that describes the capability of its analysis tool" come from? It is not in the Requirement 7 and if it is to help confirm the "adequacy" of the tools, the measurement is merely avoiding the fact that "adequacy" is too broad

## Comment Form for Compliance Elements

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a term as used in the Requirement. Is an “adequate” tool one that solves every 30 minutes or 30 seconds? Is it one that due to modeling issues only reliability solves 50% of the time or is 100% required? Should it model only the RC’s footprint or the whole Interconnection?

IRO-002-1 – M7 – Why was the specification of “operating personnel” uniquely necessary in the measurement for Req. 9, part 1? This degree of specification was not deemed necessary by the Drafting Team for the other measurements although many would also seem to expect the “operating personnel” of a functional entity (RC, BA, TOP, etc.) to actually be performing a requirement.

IRO-003-2– M1 – The use of the term “at any time” in the Requirement would require data retention that could provide continuous evidence that the requirement to monitor was met. This is not consistent with the Data retention section and also is considered impractical. It is suggested that this Requirement may be too broad to be measured.

IRO-005-2 – R2 and M2 – The requirement 2 and the measurement proposed are in conflict with the requirement in INT-008-01 for the Interchange Authority to provide Interchange information to the reliability assessment systems used by the RC’s (i.e. the IDC in the Eastern Interconnection). The RC’s are not in a position with tools to individually exchange a comprehensive set of interchange data – particularly since their time frames of analysis are limited into the future. This Measurement should not be created and instead the Drafting Team should recommend the requirement be retired.

PRC-001-1 - M1 Change wording to indicate only relay settings impacting neighboring systems require notification change ... changes as noted in Requirements 3, 3.1, and 3.2. to ... changes impacting neighboring systems as required in Requirements 3, 3.1 and 3.2.

PRC-001-1: Data Retention – The drafting team should consider making the data retention for M1 consistent with the other standards being reviewed for this effort. Rather than “two current years plus the current year” (which seems excessive for this measurements) use the “current, in-force documents” used in the other similar measurements requiring letters of agreement, studies, etc. as evidence.

TOP-001-1: M6 – The last part of the measurement contains the “exception” condition “unless such actions would violate safety, equipment, or regulatory or statutory requirements’ contained in R6. The measurement is not clear/specific on any additional information that would be required to demonstrate compliance in the “unless” exception conditions. It only seems to require evidence that it rendered assistance to others as requested. Different evidence probably is required (e.g. regulatory/statutory references, safety concerns, equipment names, etc.) should assistance be withheld as allowed under the requirement. M7 – The measurement does not capture the “burden” characteristic stated in the requirement. Without this being captured in the measurement, it gives the impression that evidence of notification should be provided when any facility is removed from service – whether burdensome to a neighbor or not.

TOP-002-1: M1 – The Drafting Team should consider withdrawing the measurement since the “through a reasonable future time period” of the requirement is too broad and vague. The attempt in the measurement to define this better with the terms such as “current day plans for the past several weeks” fails to capture the “future” aspect of the requirement. Each “current day” may have a new set of “future” considerations as system conditions change and the time period into the future from

## Comment Form for Compliance Elements

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the current day is still left open to interpretation. If the Drafting Team decides to leave the measurement "as is", it should at least consider moving the "for the past several weeks" to the Data Retention section since it would be out of place in the measurement itself.

TOP-006-1: M5 – The use of the term "important" in the Requirement 5 and carried forward into the measurement in reference to deviations is open to interpretation. It is suggested that this Requirement is too broad to be measured and no measurement provided.

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  - Do not** use quotation marks in any data field.
  - Do not** submit a response in an unprotected copy of this form.

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



## Comment Form for Compliance Elements

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Please Enter All Comments in Simple Text Format.

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

The implementation plan for this set of standards assumes that the set of standards will be approved by the stakeholders in October 2006 and by the NERC Board of Trustees in November 2006. The proposed effective date for all revisions would be January 1, 2007. The drafting team is recommending that the set of standards be balloted with a single ballot.

1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments: We do not agree with the proposed implementation plan. Through this effort, the CEDST has found and industry agreed, for a variety of reasons, that specific measures could not be developed for many of the individual requirements in this package of Missing Measures Standards. Without these measures, it is not possible for responsible entities to comply with the requirements in that standard, as stated in the Compliance with Standards section of this implementation plan. For this reason, we request that the COMPLINCE WITH STANDARDS portion of the implementation plan be modified to ensure that 1) responsible entities are only expected to demonstrate compliance with those requirements for which measures have been developed, and 2) compliance with each of these requirements will be measured only as specified in the measurements. Additionally, we feel that this implementation plan must be modified to specify that NERC will undertake a Standards Development Project to specifically revisit and revise as required those requirements that the CEDST has identified as having one or more issues that prevent the industry from being able to develop the measures necessary to assess compliance with them, as required (i.e. lacking measurements, unmeasurable criteria, vague or confusing language, inappropriate applicability, duplicate requirement measured elsewhere, etc.). Until this type of process is completed and all identified issues have been resolved, there is no way that responsible entities can be expected to demonstrate full compliance with all requirements in these standards, as specified and required in this Implementation Plan.

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments: COM-001: We agree that most of COM-001-1 is duplicated in COM-002-R1. However, COM-002-R1 does not address R1.4 in any way. This requirement specifies that ... Where applicable, these facilities shall be redundant and diversely routed. These diversity and redundancy requirements are fundamental to the reliability of the bulk power system. As such, we request that this requirement remain and that a measure be developed to ensure adherence to it. At this point, the measure would need to reside in COM-001 with the requirement as written. Were this requirement to be merged into COM-002-R1 in the future, then it would be appropriate to move the related measure at that time.

EOP-002-2 M4&5: We disagree with the removal of the original measures numbered

## Comment Form for Compliance Elements

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M4 and M5, as well as and the associated Levels of Compliance language in sections 3.2 and 3.3.1; which measure compliance with R5 Part 1 and 2 respectively. We also disagree that the requirement to perform all actions necessary is too broad. Though we agree with the other commenters that these measures need to be clarified, we have the following suggestions for resolving the issues, rather than avoiding them by removing the measurements and thereby removing enforceability of this very important requirement. To this end, we request that the issue of --all actions being considered-- be dealt with by adding language to the original M4 stating that the phrase --all available-- is to be evaluated using a list of available resources that has previously been developed by each BA and provided for this purpose. We also feel that though the industry may want to undergo a future process to further clarify the specific ... time needed to implement corrective actions ... language, as used in the original M4, it is possible to develop an appropriate measurement. This measure should include language specifying --a determination of whether or not the System Operator 1) initiated the steps required to implement the necessary corrective actions without delay and 2) relinquished use of the emergency assistance as soon as the necessary corrective actions were able to replace the energy being received through emergency assistance.-- Further, we request that the issue of unilaterally adjusted generation be clarified to refer to instances in which a Balancing Authority adjusts generation without a corresponding ACE or interchange schedule requiring such change.

EOP-003-1: We disagree with the removal of the original measure M2 and associated original Level of Compliance specified at 2.4.1. Coordination of load shedding plans is a very important component in maintaining the reliability of the bulk power system. Though we agree with commenters that there are probably differing interpretations within the industry of what is meant by the word coordinate, we do not feel that this is a reason to remove this measure; thereby remove enforceability of this requirement, which is such a vital component of maintaining reliability of the bulk power system, and moving to a lowest common denominator interpretation of this important requirement. The dictionary definition of this usage of the term COORDINATE is -->to harmonize in a common action or effort <-- . Though this interpretation might not require the level of formal agreement and approval that would technically be required to ensure that all of the load shedding plans do in fact work together harmoniously, we suggest that this measure be modified to, at a minimum, require that --all TOs with a load shedding program discuss these programs with each of its interconnected BAs and TOPs and evaluate its interactions with any loadshedding programs that they may have to identify and resolve any potential problems that might arise with interactions between them were either or both of them to be put into action.--

INT-003-2: The section titled Levels of Non-Compliance for BAs Level 4 contains multiple typos. It looks like it should be identical to Levels 1 - 3 except replacing the specified number with "four or more". We ask that this be corrected.

IRO-005-2: M12: Since this standard has been corrected through errata to apply to GOPs, LSEs and PSEs as required, these entities should be added back into M12 as it was originally written.

IRO-005-2: New M14: We agree with the dissimilarities between R14 Part 2 and TOP-005-1 and the resultant need for M14 to be written. However, we feel that M14 should be modified as required to specify both that 1) data from TO showing SOLs and IROLs made known by the RC, and 2) evidence that the TO respected SOLs and IROLs from RC and 3) specific methodology be used by compliance evaluator to determine whether or not the TO complied with requirement to respect these SOLs and IROLs.

## Comment Form for Compliance Elements

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3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments: BPA developed and submitted comments to Draft 1 of the Missing Measure. But we have subsequently found that though we have evidenced that we sent them in through the appropriate process, they were not received by NERC and considered by CEDST. We have gone through those comments found that the following issues have not been addressed in this Draft 2 and are therefore still applicable.

COM-001-2: REQUIREMENT 2: The purpose of COM-001-2 R2 is to ensure that disciplined voice communication practices are observed. To measure this, we ask that a measure be developed for this requirement that specifically verifies that the BA, TO, RC has policies in place defining proper communication procedures and form for all types of voice communications relating to ALL operational concerns; not just those in which the RC issues a formal DIRECTIVE to a TO or BA to take action. Voice recordings and/or transcripts of voice recordings should be used to verify that utility procedure is followed.

EOP-003-1: REQUIREMENT 7: We ask that specific requirements be developed to specifically measure BA and TOP compliance with ROP-003-1 R7, as written. Though EOP-003-1 R7 is similar and related to PRC-006-0, they are not entirely duplicative. Where EOP-003 R7 is written to specifically address the roles and responsibilities of the TOP and BA to coordinate its UFLS programs with its interconnected BAs and TOPs, PRC-006-0 addresses only the more global responsibilities of RROs to develop and document a regional UFLS program, of which the BA and TOP Load Shedding Programs are a subset. As such, PRC-006 R1 is applicable only to RROs, and not TOPs and BAs, as specified in EOP-003-1 R7. Therefore, it does not replace the responsibility of each individual BA and TOP to ensure that all of its underfrequency load shedding is coordinated as required in EOP-003 R1.

EOP-004-1: MEASURE 1: As written this measure does not address how the compliance evaluator is to determine whether or not the specific procedure provided by the RRO actually meets the requirement to ... facilitate preparation of ... disturbance reports, as specified in Requirement 1. Therefore, we ask that EOP-004-1 M1 be modified to give guidance as to how this determination is to be made. Otherwise, this becomes a subjective rather than objective measure.

EOP-002-2: MEASURE 2 and MEASURE 3: M2 and M3 focus on the need for the BA and RC to provide the data that the entity responsible for monitoring compliance needs to determine compliance with R2 and R3 respectively. But as written, M2 and M3 do not adequately get at answering the essential question of ?? Did the performance demonstrated by the entity actually meet the specific Requirement in question? ?. Therefore, we ask that these measures be modified to include additional metrics that specifically address how the Compliance Monitor is to determine whether or not RC and/or BA has met the specific requirement in each case.

EOP-006-1: MEASURE 1 and MEASURE 3: As written, EOP-006-1 M1 and M3 do not address how the compliance evaluator is to determine whether or not the specific plan provided in the specified measure actually meets the specifications of the Requirement in question. Therefore, we ask that M1 and M3 be modified to include

## Comment Form for Compliance Elements

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additional metrics that specifically address how these determinations are to be made in a consistent manner in each case.

EOP-006-1: MEASURE 2 and MEASURE 5: As written, M2 and M5 do not address how the compliance evaluator is to determine whether or not the actions of the Reliability Coordinator met the specifications the specified Requirement. We ask that M2 and M5 be modified to give guidance as to how these determinations are to be made.

INT-001-2: REGIONAL DIFFERENCES: We request that the Regional Differences section of INT-001-2 be modified as required to specify that all tagging requirements for Dynamic Schedules in the Western Interconnection are subject to the WECC Dynamic Schedule Business Practice.

IRO-002-1: MEASURE 1 and MEASURE 2: As written, M1 and M2 do not address how the Compliance Monitor is to determine whether or not the data communications methodologies ... meet the reliability needs of the interconnection ... as specified in R4. We ask that M1 and M2 be modified to give guidance as to how these determinations are to be made. Otherwise, these become subjective rather than objective measures.

IRO-002-1: REQUIREMENT 7 and MEASURE 5: In order to meet R7, entities must implement some tools that few have working. Yet as written, the associated measures do not include any specific performance requirements for these tools (i.e. transient & voltage stability programs). Therefore, we request that M5 be modified to both 1) document both the minimum performance requirements for each system, and 2) give additional metrics and guidance as to how the Compliance Monitor is to determine whether or not the performance of these systems meet the minimum performance requirements of this requirement in each unique and specific instance.

IRO-002-1: MEASURE 6: We request that IRO-002-1 M6 be modified to include both 1) the specific criteria that must be met by a --backup facility--, and 2) what documentation is necessary to support evaluation of compliance with these criteria. As presently written, there is inadequate specification in M6 of what constitutes ... adequate back-up ... as specified in R8. This measure works in a vague sense but not sufficiently to be meaningful in exacting performance. It is for these reasons that, we ask that this measure be improved by implementing our suggestion above.

IRO-002-1: REQUIREMENT 9: There are no performance or evaluation specifications for this that allow IRO-002-1 R9 to be meaningful (i.e. determine that the RC was not able to ... control its RC analysis tools ... . (i.e. documentation shows that outages are allowed only during low stress conditions, or a fully redundant system is employed, etc.)

IRO-002-1: REQUIREMENT 3: We ask that a specific measure be developed to measure compliance with IRO-002-1 R3. We disagree with CEDST there is insufficient language in IRO-002-1 R3 to write such a measure. Though some may interpret that there is confusion as to who is ultimately responsible for this communication taking place, whenever implementation of the data exchange that is accomplished via direct links between the TOs and/or BAs and the 3rd party involved, it is done because the task of communicating this information has been DELEGATED to the TO or BA by the RC. In each case, the RC remains ultimately responsible for ensuring that this communication actually occurs as required. Therefore, the RC is the correct party to hold RESPONSIBLE FOR COMPLIANCE. The measures associated with this requirement should include the data and evaluation criteria necessary to verify that these links are in place and meet the appropriate security and reliability requirements. A decision to not develop such a measure would constitute implementation of a lowest common denominator approach to implementation of this important requirement throughout the electric utility industry.

IRO-002-1: REQUIREMENT 5: Requirement 5 Part 1 is not an exact duplicate of

## Comment Form for Compliance Elements

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IRO-005 R1 and R3 and IRO-003 R1. Therefore, we ask that specific measures be developed to monitor compliance with R5. These specific measurements should include language such as --shall provide documentation of complete SOL, IROL, limits and loading information from all TOs in RC area--. Additionally, we ask that additional language be added to this measure to provide specific metrics and guidance in making the determination of whether or not the infrastructure involved is --redundant and highly reliable-- as specified in R5. A decision to not develop such a measure would constitute implementation of a lowest common denominator approach to implementation of this important requirement throughout the electric utility industry.

IRO-005-1: REQUIREMENT 2: Add a separate measure that determines whether or not the RC is ... aware of all Interchange Transactions that wheel through, source, or sink in its Reliability Coordinator Area ..., as required R2 part 1.

IRO-005-1: MISSING Compliance measure: Add Level 4: RC Did not identify the source of --large Area Control Errors--. Also need to also develop a metric to determine what amount of ACE is considered --large-- in each case.

IRO-005-1: NUMEROUS ERRORS: There are numerous errors in references used to tie elements in the Levels of Non-Compliance back to specific Requirements and Measures in the standard. In some cases, the requirement is referenced, but not the measurement. In other cases, the referenced requirement and measure do not match. These need to be investigated and corrected as required. (For example, Compliance Levels 3.3.1 and 3.3.2 should be changed to refer to R5 and R6 respectively).

IRO-005-1: REQUIREMENT 9: We ask that a specific measure be developed to measure IRO-005-1 Requirement 9 Part 2. R9 part 2 is not an exact duplicate of IRO-001 R7. Therefore, separate measures are needed and must be added to monitor specific compliance with R9 Part 2.

IRO-005-1: REQUIREMENT 10: We ask that a specific measure be developed to measure IRO-005-1 Requirement 10. Though R4 and R10 are related, the intent of R10 for the RC requirement to -- ... assist the BA ... -- is distinctly different than the intent within R4 that -- ... RC shall monitor ... RC shall direct the BA ...--. The measurement for R10 should include both 1) RC provide necessary supporting information, and 2) criteria for determining that -- RC assisted the BA in arranging for assistance, as required.

IRO-005-1: REQUIREMENT 14 PART 2: We ask that a specific measure be developed to measure IRO-005-1 Requirement 14 Part 2. We disagree that there is a similarity between R14 Part 2 and TOP-005 R1. TOP-005 R1 requires that the TO tell the RC what its transmission limitations are. It does NOT obligate the TO to respect SOLs or IROLs that the RC may place upon their facilities due to limitations placed upon these facilities due to system conditions outside the TO's service territory, etc., as required by R 14 Part 2. The specific measure developed for R14 Part 2 should include specific metrics addressing 1) data from TO showing SOLs and IROLs made known by the RC, 2) evidence that the TO respected SOLs and IROLs from RC, and 3) specific methodology to be used by compliance evaluator to determine whether or not the TO complied with requirement to respect these SOLs and IROLs.

IRO-005-1: REQUIREMENT 16: We ask that a specific measure be developed to measure IRO-005-1 Requirement 16. We disagree with CEDST that this requirement is too vague to be measured. Measures for this requirement should include specific metrics addressing the need for 1) proof of coordinated and approved procedures for confirming reliability assessment results, 2) records of all discussions of and actions taken to mitigate potential or actual SOL or IROL violations, and 3) assessment of the effectiveness of the assessments and effectiveness of actions taken.

PER-004-1: REQUIREMENT 1: We request that the technical differences between

## Comment Form for Compliance Elements

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the associated measures and levels of compliance in PER-004-R1 and PER-003 R1 must be reconciled. Though the measures in PER-004-R1 and PER-003 R1 are similar, their compliance levels are different. The compliance levels required for RC should be at least as stringent, if not more so, than those required in PER-003 for TOs and BAs; which does not seem to be the case.

PER-004-1: REQUIREMENT 5: We ask that a specific measure be developed to measure PER-004-1 Requirement 5. The most appropriate measure to meet the intent of PER-004-1 R5 must include metrics that verify that the RC had access to displays and alarms required to keep them aware of the status of all potential SOLs and IROLs within their jurisdiction.

PRC-001-1: REQUIREMENT 8: Modify Measure 4 to require status notification only for --major changes or additions, or when the scheme is unavailable--. Special Protection Schemes are constantly adjusted based upon schedules and outages. Adjustments include enabling or disabling various portions of the scheme and are made based upon various system studies. M4 appears to require that TOPs and BAs to notify someone for every change in operating and/or arming level of the scheme. In fact, the notification requirements in M4 should be limited to overall changes or additions to schemes and not routine changes based upon current system conditions or when a redundant part of a special protection scheme is unavailable because of maintenance, testing, or construction, etc.

PRC-001-1: Level 4 Non-compliance for special protection status notification should only be required for major changes or additions, or when the scheme is unavailable.

TOP-002-1: REQUIREMENT 3: We disagree with CEDST determination that R3 is too vague and request that a measure be developed for R3. Demonstration of coordination, as specified in this requirement, would best be measured by demonstrating that a process exists and is followed to provide BA with current, accurate, maintenance schedules, estimated load, etc. (Similar in structure to M7 as written for R15).

TOP-002-1: REQUIREMENT 4: We ask that a specific measure be developed to measure TOP-002-1 Requirement 4. We disagree with CEDST determination that R4 is too vague and request that a measure be developed for R4. Demonstration of coordination, as specified in this requirement, would best be confirmed by metrics that ask for documentation showing BA, TO, and RC participation in regional outage coordination processes, reserve pools, etc. (Similar in structure to M7 as written for R15).

TOP-002-1: REQUIREMENT 12: We ask that a specific measure be developed to measure TOP-002-1 Requirement 12. Though they are related and similar, the requirements placed upon the TSP in R12 are NOT the same as FAC-013, which applies only to the RC and PA. Appropriate measures for TOP-002-1 R12 must include metrics that require 1) the provision of the necessary data and 2) a verification that all known SOLs and IROLs were actually included in the TSP determination of transfer capabilities.

x

## Comment Form for Compliance Elements

Please use this form to submit comments on the Compliance Elements Standard Drafting Team's second draft of the 20 Missing Compliance Measures and Elements standards. Comments must be submitted by **August 23, 2006**. You must submit the completed form by e-mail to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Compliance Elements" in the subject line. If you have questions please contact Richard Schneider at [richard.schneider@nerc.net](mailto:richard.schneider@nerc.net) or 609-452-8060.

### ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

**DO:** Do enter text only, with no formatting or styles added.  
Do use punctuation and capitalization as needed (except quotations).  
Do use more than one form if responses do not fit in the spaces provided.  
Do submit any formatted text or markups in a separate WORD file.

**DO NOT:** Do not insert tabs or paragraph returns in any data field.  
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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Dave Folk	
Organization:	First Energy Corp	
Telephone:	330-336-9063	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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## Comment Form for Compliance Elements

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

The implementation plan for this set of standards assumes that the set of standards will be approved by the stakeholders in October 2006 and by the NERC Board of Trustees in November 2006. The proposed effective date for all revisions would be January 1, 2007. The drafting team is recommending that the set of standards be balloted with a single ballot.

1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments:

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments: Int-001-2 has requires "operator lots" this should be operator logs.

TOP-004-1 M1 states "Each Transmission Operator enters ..." This should read "Each Transmission Operator that enters...",

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments: We agree that these measures are ready for balloting with the changes suggested in item 2 above.

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	James H. Sorrels, Jr.
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NERC Region	Registered Ballot Body Segment
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
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Please Enter All Comments in Simple Text Format.

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

The implementation plan for this set of standards assumes that the set of standards will be approved by the stakeholders in October 2006 and by the NERC Board of Trustees in November 2006. The proposed effective date for all revisions would be January 1, 2007. The drafting team is recommending that the set of standards be balloted with a single ballot.

1. Do you agree with the implementation plan? If not, provide specific comments on the elements you do not agree with.

Yes

No

Comments: The majority of these standards still require additional work with respect to measures and compliance levels. Additionally, a few need work with respect to their requirements. Finally, these standards should be balloted individually. Otherwise, many entities will be forced to vote "no" for the entire set even if they only have real issues with the measures and/or compliance levels of only one standard.

2. The drafting team made conforming changes to the standards in response to stakeholder comments. The conforming changes were highlighted in the consideration of the comments which has been posted. Please identify any changes that you disagree with.

Comments: While the drafting team was limited only to adding missing measures and compliance elements, missing measures could not be established for numerous requirements as written. By definition, a requirement should be actionable and measurable. Where a measure can not be defined, this deficiency suggests that the requirements in question should be redrafted prior to moving forward for comment and balloting. Following are comments by measure:

Acceptable as written: CIP-001-1, COM-001-1, COM-002-2, EOP-002-2, EOP-006-1, IRO-001-1, IRO-002-1, IRO-003-2, TOP-008-1

EOP-003-1 Fundamental work on this standard as only two of eight requirements were written well enough for a measure to be developed. Please note comments of the drafting team.

EOP-004-2 In general, finds this standard to be acceptable, however, requirement issues are identified by the drafting team that should be addressed before moving this standard forward.

INT-001-2 Note edit for "logs" instead of "lots" in M2.

INT-003-2 There are numerous problems with both this standard and the proposed modifications.

This standard contains duplicate penalties for the same infraction as in standard INT-009-1. In standard INT-003-2, the Balancing Authority (BA) will be in non-compliance for entering one or more schedules into its ACE equation without confirming the schedule. This action also implies that the BA did not implement Confirmed Interchange as received from the Interchange Authority (IA) as required

## Comment Form for Compliance Elements

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in standard INT-009-1, which also penalizes you with the first offense. Thus, for the action of implementing a non-approved schedule and thus deviating from the IA Confirmed Interchange (Confirmed Interchange can only include confirmed schedules) an entity will receive two findings of non-compliance. This duplication in the NERC standards should be corrected.

The levels of compliance do not take into account the risk and severity of the violations, and neither does the Risk Factor Survey for this standard. The Risk Factor Survey assumes incorrectly that violation of a requirement can be always delineated into either a High Risk, Medium Risk or Lower Risk requirement. However, that is only true if the requirement is written with that in mind. In this case, a Level 1 violation could be of lower risk or high risk, depending upon the magnitude of the schedule. For example, implementation of a 10 MW schedule that has not been properly confirmed will only result in a low risk to the bulk electrical system (BES). However, implementation of say a 1,000 MW schedule that has not been properly confirmed, could result in a high risk to the BES. As presently written, both are a level 1 violation to the same requirement and thus would have the same risk factor for penalties. Yet, clearly one is more serious than the other. Thus, either the whole concept of risk factors needs to be re-evaluated or the levels of non-compliance for this standard should be re-written to take this into consideration. We submit that it would be easier to re-write the levels of non-compliance for this standard than to redo the entire concept of risk factors. We suggest the following as guidelines for consideration as how to rewrite the levels of non-compliance: There should be a magnitude threshold for the levels of non-compliance in addition to the number of times the requirement is violated. Thus, a one time violation of say 50 MW or less may be a Level 1 violation, whereas a one time violation of 500 MW or more may be a level 4 violation. Additionally, four violations of 50 MW or less for each occurrence would also be a level 4 violation. Finally, given that in any given year hundreds of thousands of schedules, or possibly into the millions, are reviewed, is it practical to require perfection? While that should be the goal, is that what the requirement should be? Certainly for medium to high risk schedules (i.e. the larger schedules). But for 5 Mw or 10 MW low risk schedules, maybe the threshold for level 1 should be 5 violations of say 25 MW or less.

This standard, both in its requirements and measures, allows for you to be in compliance with the standard as long as both the receiving and sending BA's have confirmed the schedule. However, to have a Confirmed Interchange, the Transmission Service Provider (TSP) must also confirm the schedule, as per standard INT-006-1. Thus, even if the BA's are in agreement and have approved the scheduled, if a TSP has not approved the scheduled, the schedule will not be part of the IA's Confirmed Interchange. Thus, if the BA's implement the schedule in their ACE, they will be in compliance with INT-003-2 but in violation of INT-009-1. Shouldn't this incongruity be fixed?

Level 3 Non-compliance is not written correctly. It states. "There shall be a separate Level 3 non-compliance, for every one of the following conditions." It should be worded the same as Level 1 & 2, which state: "There shall be a separate Level X non-compliance, if either of the following conditions exists."

Level 4 is just a re-statement of Level 3, which does not appear to be correct.

IRO-005-2 There are numerous requirement issues identified by the drafting team. Note that the redlines in place for version 1 were not turned off.

## Comment Form for Compliance Elements

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PER-004-1 Requirements need to be better defined. Phrases such as "pay particular attention" and "best available information" lack the necessary clarity. Note edit necessary in drafting team comment, "M1" for "R1" at "C. Measures."

PRC-001-1 Serious work needs to be made on the requirements as only two of eight can be effectively measured as written.

TOP-001-1 Requirement 5 necessitates the notification of ". . . any other potentially affected Transmission Operators . . ." which is inconsistent with procedures in RTOs (such as SPP and PJM) wherein the RC assumes responsibility of notifying Transmission Operators. Additionally, the determination of "any other potentially affected Transmission Operators" is rather all encompassing and can be quite difficult with the information available to the Transmission Operator.

TOP-002-1 The drafting team has identified duplication of requirements to other standards that should be addressed. Additionally, the team identified a requirement that is "incorrectly written."

TOP-004-1 The drafting team has observed that R1 "cannot always" be met and is better thought of as a goal. Other measurement issues are also identified by the team. M2 suggest that "current" policies and procedures be available, but current should be better specified, such as that such policies and procedures be reviewed annually.

TOP-006-1 R1.2 necessitates that other "affected" BAs and TOs be informed of all generation and transmission resources available for use. The determination of "affected" BAs and TOs is difficult and nebulous. Out of service information is already widely available to TOs and BAs. An edit issue on Compliance 1.3 wherein all referenced measures (3, 4, 5 and 6) are stuck in the fourth Data Retention statement. It would seem that only Measures 4 and 5 remain for reference, as the drafting team could not develop measures for 3 and 6.

3. The drafting team believes that this set of standards is ready to move forward to balloting. If you have any comments (that you haven't already provided to the drafting team in the comments above) relative to the changes made to this set of standards to add missing measures and compliance elements, please provide them here. (Please note that the drafting team cannot use comments suggesting changes to the requirements in the standards because the SAR assigned to this drafting team is limited to adding missing measures and compliance elements.)

Comments: For the aforementioned reasons, AEP does not agree that this set of standards is ready to move forward for balloting. AEP is also concerned that many standards are being moved through the process too quickly, without the due consideration of stakeholders, and the results of such an expedited process may be unsatisfactory. A more comprehensive effort is recommended.