

**Comment Form — 1st Draft of SAR for Disturbance Monitoring
Project 2007-11**

Please use this form to submit comments on the proposed SAR for Disturbance Monitoring. Comments must be submitted by **April 20, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the abbreviation "DME SAR" in the subject line. If you have questions please contact **David Taylor** at David.Taylor@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ed Davis	
Organization:	Entergy Services	
Telephone:	504-576-3029	
E-mail:	edavis@entergy.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

Background Information

This project involves revising the requirements in the following two standards:

- PRC-002 — Define and Document Disturbance Monitoring Equipment Requirements
- PRC-018 — Disturbance Monitoring Equipment Installation and Data Reporting

PRC-002 was a Version 0 standard that was modified solely to add Phase III & IV planning Measures; PRC-018 is a new standard developed as a translation of Phase III & IV measures. As the electric reliability organization begins enforcing compliance with reliability standards under Section 215 of the Federal Power Act in the United States and applicable statutes and regulations in Canada and Mexico, the industry needs a set of clear, measurable, and enforceable reliability standards. The Version 0 standards and the translation of Phase III & IV planning measures, while a good foundation, were translated from historical operating and planning policies and guides that were appropriate in an era of voluntary compliance. However, it is important to update the standards in a timely manner, incorporating improvements to make the standards more suitable for enforcement and to capture prior recommendations that were deferred during the Version 0 translation.

The PRC-002 revision and new PRC-018 were recently approved in 2006. In conjunction with this project, the standard drafting team will collect feedback on the strengths and weaknesses of this set of standards from the Operating and Planning Committees and from compliance personnel. The data collected will be used to modify these standards.

PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The Federal Energy Regulatory Commission has determined that it will not approve PRC-002 in its current form because the requirements are assigned to the Regional Reliability Organization rather than to a functional entity that is an 'owner, operator, or user' of the bulk power system. The requirements in PRC-002 establish requirements for installation of Disturbance Monitoring Equipment (DME) and reporting of disturbance data to facilitate analyses of events and verify system models. This standard addresses some of the recommendations from the studies conducted following the blackout of August 2003.

The standard drafting team will work with stakeholders to review PRC-002 and each of the current regional disturbance monitoring equipment requirements to determine which requirements should be continent-wide requirements and which requirements should be included in regional standards. The requirements in PRC-018 will be revised to properly reference these changes.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

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You do not have to answer all questions. Enter All Comments in Simple Text Format.

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

1. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 — disturbance equipment installation, monitoring, and reporting so that both standards are enforceable and complement one another?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

We do not think there is a reliability-related need to revise PRC-002 and PRC-018. However, we do agree that it will be a worthwhile effort to revise the two standards to make them: enforceable by FERC, more compatible with each other, and to address FERC staff and FERC comments.

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

4. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Steve Myers	
Organization:	ERCOT	
Telephone:	512-248-3077	
E-mail:	smyers@ercot.com	
NERC Region		Registered Ballot Body Segment
<input checked="" type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
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The PRC-002 revision and new PRC-018 were recently approved in 2006. In conjunction with this project, the standard drafting team will collect feedback on the strengths and weaknesses of this set of standards from the Operating and Planning Committees and from compliance personnel. The data collected will be used to modify these standards.

PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The Federal Energy Regulatory Commission has determined that it will not approve PRC-002 in its current form because the requirements are assigned to the Regional Reliability Organization rather than to a functional entity that is an 'owner, operator, or user' of the bulk power system. The requirements in PRC-002 establish requirements for installation of Disturbance Monitoring Equipment (DME) and reporting of disturbance data to facilitate analyses of events and verify system models. This standard addresses some of the recommendations from the studies conducted following the blackout of August 2003.

The standard drafting team will work with stakeholders to review PRC-002 and each of the current regional disturbance monitoring equipment requirements to determine which requirements should be continent-wide requirements and which requirements should be included in regional standards. The requirements in PRC-018 will be revised to properly reference these changes.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

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

1. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 — disturbance equipment installation, monitoring, and reporting so that both standards are enforceable and complement one another?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments: N/A

4. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.
Comments: No further comments at this time.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Thomas Owens	
Organization:	Dominion Va Power Electric Transmission	
Telephone:	804-257-4693	
E-mail:	tom.owens@dom.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
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The PRC-002 revision and new PRC-018 were recently approved in 2006. In conjunction with this project, the standard drafting team will collect feedback on the strengths and weaknesses of this set of standards from the Operating and Planning Committees and from compliance personnel. The data collected will be used to modify these standards.

PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The Federal Energy Regulatory Commission has determined that it will not approve PRC-002 in its current form because the requirements are assigned to the Regional Reliability Organization rather than to a functional entity that is an 'owner, operator, or user' of the bulk power system. The requirements in PRC-002 establish requirements for installation of Disturbance Monitoring Equipment (DME) and reporting of disturbance data to facilitate analyses of events and verify system models. This standard addresses some of the recommendations from the studies conducted following the blackout of August 2003.

The standard drafting team will work with stakeholders to review PRC-002 and each of the current regional disturbance monitoring equipment requirements to determine which requirements should be continent-wide requirements and which requirements should be included in regional standards. The requirements in PRC-018 will be revised to properly reference these changes.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

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

1. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 — disturbance equipment installation, monitoring, and reporting so that both standards are enforceable and complement one another?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments: There are specific changes needed, but the general SAR process steps listed should identify needed changes. Details can be worked out during drafting of changes.

4. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.

Comments: No comments until first draft is posted.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Dave Folk	
Organization:	FirstEnergy	
Telephone:	330-384-4668	
E-mail:	folkd@firstenergycorp.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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The PRC-002 revision and new PRC-018 were recently approved in 2006. In conjunction with this project, the standard drafting team will collect feedback on the strengths and weaknesses of this set of standards from the Operating and Planning Committees and from compliance personnel. The data collected will be used to modify these standards.

PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The Federal Energy Regulatory Commission has determined that it will not approve PRC-002 in its current form because the requirements are assigned to the Regional Reliability Organization rather than to a functional entity that is an 'owner, operator, or user' of the bulk power system. The requirements in PRC-002 establish requirements for installation of Disturbance Monitoring Equipment (DME) and reporting of disturbance data to facilitate analyses of events and verify system models. This standard addresses some of the recommendations from the studies conducted following the blackout of August 2003.

The standard drafting team will work with stakeholders to review PRC-002 and each of the current regional disturbance monitoring equipment requirements to determine which requirements should be continent-wide requirements and which requirements should be included in regional standards. The requirements in PRC-018 will be revised to properly reference these changes.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

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You do not have to answer all questions. Enter All Comments in Simple Text Format.

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

1. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 — disturbance equipment installation, monitoring, and reporting so that both standards are enforceable and complement one another?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments: RFC is in the process of developing a Disturbance Monitoring Equipment standard based on NERC standards PRC-002 and PRC-018. The SAR requires the SDT to review PRC-002 and each of the current regional programs developed in accordance to that standard. The SAR should be revised to require the SDT to review and address the current regional programs developed in accordance to PRC-018.

3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments: It appears this question is worded incorrectly such that it requires an explanation for a "Yes" response rather than an explanation for a "No" response.

4. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.
Comments: Please revise the Brief Description to include any special considerations for PRC-018 similar to the special considerations for PRC-002. Perhaps the last paragraph is applicable to both PRC-002 and PRC-018 standards but it is not clear. For the Applicable Reliability Principles Table on page 4, boxes 5 and 7 should also be checked since they refer to system monitoring.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Roger Champagne	
Organization:	Hydro-Québec TransÉnergie	
Telephone:	514 289-2211, X 2766	
E-mail:	champagne.roger.2@hydro.qc.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The Federal Energy Regulatory Commission has determined that it will not approve PRC-002 in its current form because the requirements are assigned to the Regional Reliability Organization rather than to a functional entity that is an 'owner, operator, or user' of the bulk power system. The requirements in PRC-002 establish requirements for installation of Disturbance Monitoring Equipment (DME) and reporting of disturbance data to facilitate analyses of events and verify system models. This standard addresses some of the recommendations from the studies conducted following the blackout of August 2003.

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

1. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 — disturbance equipment installation, monitoring, and reporting so that both standards are enforceable and complement one another?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

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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	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
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You do not have to answer all questions. Enter All Comments in Simple Text Format.

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

1. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 — disturbance equipment installation, monitoring, and reporting so that both standards are enforceable and complement one another?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

4. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.
Comments:

**Comment Form — 1st Draft of SAR for Disturbance Monitoring
Project 2007-11**

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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"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

Background Information

This project involves revising the requirements in the following two standards:

- PRC-002 — Define and Document Disturbance Monitoring Equipment Requirements
- PRC-018 — Disturbance Monitoring Equipment Installation and Data Reporting

PRC-002 was a Version 0 standard that was modified solely to add Phase III & IV planning Measures; PRC-018 is a new standard developed as a translation of Phase III & IV measures. As the electric reliability organization begins enforcing compliance with reliability standards under Section 215 of the Federal Power Act in the United States and applicable statutes and regulations in Canada and Mexico, the industry needs a set of clear, measurable, and enforceable reliability standards. The Version 0 standards and the translation of Phase III & IV planning measures, while a good foundation, were translated from historical operating and planning policies and guides that were appropriate in an era of voluntary compliance. However, it is important to update the standards in a timely manner, incorporating improvements to make the standards more suitable for enforcement and to capture prior recommendations that were deferred during the Version 0 translation.

The PRC-002 revision and new PRC-018 were recently approved in 2006. In conjunction with this project, the standard drafting team will collect feedback on the strengths and weaknesses of this set of standards from the Operating and Planning Committees and from compliance personnel. The data collected will be used to modify these standards.

PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The Federal Energy Regulatory Commission has determined that it will not approve PRC-002 in its current form because the requirements are assigned to the Regional Reliability Organization rather than to a functional entity that is an 'owner, operator, or user' of the bulk power system. The requirements in PRC-002 establish requirements for installation of Disturbance Monitoring Equipment (DME) and reporting of disturbance data to facilitate analyses of events and verify system models. This standard addresses some of the recommendations from the studies conducted following the blackout of August 2003.

The standard drafting team will work with stakeholders to review PRC-002 and each of the current regional disturbance monitoring equipment requirements to determine which requirements should be continent-wide requirements and which requirements should be included in regional standards. The requirements in PRC-018 will be revised to properly reference these changes.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

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Yes

No

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Yes

No

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3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

Yes

No

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Comments:

The SDT should pose questions regarding:

(1a) whether or not NERC should require data recording performance requirements that can only be met by purchasing specific assets

(1b) if it is sufficient to mandate what information and performance is required rather than the hardware itself (it should accomplish the same results but would avoid the issue of asset purchasing)

(1c) should assets per se be handled by the certification / recertification process - if the entity does not have the equipment, then it can not be certified; and if it doesn't continue to meet the requirements, it would not be able to meet compliance objectives

(2) If the PRC-002 requirements were not interconnection-wide, then DT should ask whether or not the obligation for the DME characteristic plans be assigned to the PC or TOP rather than the Regional Entity? PCs and TOPs have a better understanding of their own locality than would a region that may be tempted to homogenize the characteristic requirements

(3) should ad hoc hardware details (sampling rates, file naming; format) be left to NAESB rather than NERC? Reliability only needs the information - efficiency and commonality would seem to be more related to Business Practices

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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	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

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Yes

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4. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.

Comments: none

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Brian F Thumm	
Organization:	ITC Transmission	
Telephone:	248-374-7846	
E-mail:	bthumm@itctransco.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 — disturbance equipment installation, monitoring, and reporting so that both standards are enforceable and complement one another?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

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Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Gammon	
Organization:	Kansas City Power & Light	
Telephone:	816-654-1242	
E-mail:	816-654-1245	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The Federal Energy Regulatory Commission has determined that it will not approve PRC-002 in its current form because the requirements are assigned to the Regional Reliability Organization rather than to a functional entity that is an 'owner, operator, or user' of the bulk power system. The requirements in PRC-002 establish requirements for installation of Disturbance Monitoring Equipment (DME) and reporting of disturbance data to facilitate analyses of events and verify system models. This standard addresses some of the recommendations from the studies conducted following the blackout of August 2003.

The standard drafting team will work with stakeholders to review PRC-002 and each of the current regional disturbance monitoring equipment requirements to determine which requirements should be continent-wide requirements and which requirements should be included in regional standards. The requirements in PRC-018 will be revised to properly reference these changes.

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

1. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 — disturbance equipment installation, monitoring, and reporting so that both standards are enforceable and complement one another?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments: PRC-002: Part of the concern stated in the SAR is the development of criteria for the need for DME, criteria for the placement of DME, criteria for DME monitoring and data capture & retention, and other criteria for data reporting and program review is too open and needs to be tightened. This standard is targeted at a regional level and is an appropriate designation as different regions may have different DME needs. As an example, dense transmission systems with shorter transmission facilities and tight interconnections will have different dynamic characteristics of interest than transmission systems that are much less dense with longer transmission facilities and not as many interconnections. It is appropriate for members of regional operations to work with their regions to establish and document their DME individual regional needs. I am concerned regarding the statement that the standard as written needs to be further defined to eliminate the "fill in the blank" perception. Responding yes, as long this standard does not get so prescriptive that it stifles the ability of the regional entities to develop DME criteria that fits their regional configurations and system characteristics.

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

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No

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Robert Coish	
Organization:	Manitoba Hydro	
Telephone:	204-487-5479	
E-mail:	rgcoish@hydro.mb.ca	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
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Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments: It seems that Applicable Reliability Principle number 5, Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of interconnected bulk power systems, should also be checked as disturbance monitoring is an important system monitoring function in addition to real-time monitoring.

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

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Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments: Comments need to be provided for a "Yes" response.

4. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.

Comments: There are no comments to submit at this time.

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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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- PRC-002 — Define and Document Disturbance Monitoring Equipment Requirements
- PRC-018 — Disturbance Monitoring Equipment Installation and Data Reporting

PRC-002 was a Version 0 standard that was modified solely to add Phase III & IV planning Measures; PRC-018 is a new standard developed as a translation of Phase III & IV measures. As the electric reliability organization begins enforcing compliance with reliability standards under Section 215 of the Federal Power Act in the United States and applicable statutes and regulations in Canada and Mexico, the industry needs a set of clear, measurable, and enforceable reliability standards. The Version 0 standards and the translation of Phase III & IV planning measures, while a good foundation, were translated from historical operating and planning policies and guides that were appropriate in an era of voluntary compliance. However, it is important to update the standards in a timely manner, incorporating improvements to make the standards more suitable for enforcement and to capture prior recommendations that were deferred during the Version 0 translation.

The PRC-002 revision and new PRC-018 were recently approved in 2006. In conjunction with this project, the standard drafting team will collect feedback on the strengths and weaknesses of this set of standards from the Operating and Planning Committees and from compliance personnel. The data collected will be used to modify these standards.

PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The Federal Energy Regulatory Commission has determined that it will not approve PRC-002 in its current form because the requirements are assigned to the Regional Reliability Organization rather than to a functional entity that is an 'owner, operator, or user' of the bulk power system. The requirements in PRC-002 establish requirements for installation of Disturbance Monitoring Equipment (DME) and reporting of disturbance data to facilitate analyses of events and verify system models. This standard addresses some of the recommendations from the studies conducted following the blackout of August 2003.

The standard drafting team will work with stakeholders to review PRC-002 and each of the current regional disturbance monitoring equipment requirements to determine which requirements should be continent-wide requirements and which requirements should be included in regional standards. The requirements in PRC-018 will be revised to properly reference these changes.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

Comment Form — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

You do not have to answer all questions. Enter All Comments in Simple Text Format.

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

1. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 — disturbance equipment installation, monitoring, and reporting so that both standards are enforceable and complement one another?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments: While the information provided by DME provides value and contributes to reliability, we need to rethink how we apply compliance to technical standards.

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments: Assuming that this is handled as a technical standard.

3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments: It would appear that a Yes answer would need to provide supporting information. There appears to be haste in assembling this comment form.

4. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.

Comments: This particular proposed standard appears to fall into the category of a Technical Standard (refer to the Reliability Standards Development Procedure). The intent of this type of standard is that it measures something or provides information downstream in the reliability process. There is a need for such standards, but they shouldn't be handled the same way as a performance standard (failure of which directly impacts reliability). The FERC Order on the standards suggested NERC could look at creating an "administrative infraction" category for compliance. It seems we have the opportunity to address the fact that there is a need for such standards, but they need to be treated differently than performance or preparedness standards. We don't need to onerous penalties if their DFR encounters a temporary problem or a legacy piece of equipment doesn't provide all the data at the rate required in the new standard.

**Comment Form — 1st Draft of SAR for Disturbance Monitoring
Project 2007-11**

Please use this form to submit comments on the proposed SAR for Disturbance Monitoring. Comments must be submitted by **April 20, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the abbreviation "DME SAR" in the subject line. If you have questions please contact **David Taylor** at David.Taylor@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

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

Group Name: NSRS
Lead Contact: James Haigh
Contact Organization: MRO
Contact Segment: 10
Contact Telephone: (605)882-7520
Contact E-mail: haigh@wapa.gov

Additional Member Name	Additional Member Organization	Region*	Segment*
Neal Balu	WPSR	MRO	10
Terry Bilke	MISO	MRO	10
Al Boesch	NPPD	MRO	10
Larry Brusseau	MRO	MRO	10
Robert Coish, Chai	MHEB	MRO	10
Carol Gerou	MP	MRO	10
Ken Goldsmith	ALT	MRO	10
Todd Gosnel	OPPD	MRO	10
Jim Haigh	WAPA	MRO	10
Pam Oreschnik	XCEL	MRO	10
Dick Pursley	GRE	MRO	10
Dave Rudolph	BEPC	MRO	10
Rick Liljegren	MP	MRO	10
Michael Brytowsk, Secretary	MRO	MRO	10
27 Additional MRO Members	Not Named Above	MRO	10

*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 — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

Background Information

This project involves revising the requirements in the following two standards:

- PRC-002 — Define and Document Disturbance Monitoring Equipment Requirements
- PRC-018 — Disturbance Monitoring Equipment Installation and Data Reporting

PRC-002 was a Version 0 standard that was modified solely to add Phase III & IV planning Measures; PRC-018 is a new standard developed as a translation of Phase III & IV measures. As the electric reliability organization begins enforcing compliance with reliability standards under Section 215 of the Federal Power Act in the United States and applicable statutes and regulations in Canada and Mexico, the industry needs a set of clear, measurable, and enforceable reliability standards. The Version 0 standards and the translation of Phase III & IV planning measures, while a good foundation, were translated from historical operating and planning policies and guides that were appropriate in an era of voluntary compliance. However, it is important to update the standards in a timely manner, incorporating improvements to make the standards more suitable for enforcement and to capture prior recommendations that were deferred during the Version 0 translation.

The PRC-002 revision and new PRC-018 were recently approved in 2006. In conjunction with this project, the standard drafting team will collect feedback on the strengths and weaknesses of this set of standards from the Operating and Planning Committees and from compliance personnel. The data collected will be used to modify these standards.

PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The Federal Energy Regulatory Commission has determined that it will not approve PRC-002 in its current form because the requirements are assigned to the Regional Reliability Organization rather than to a functional entity that is an 'owner, operator, or user' of the bulk power system. The requirements in PRC-002 establish requirements for installation of Disturbance Monitoring Equipment (DME) and reporting of disturbance data to facilitate analyses of events and verify system models. This standard addresses some of the recommendations from the studies conducted following the blackout of August 2003.

The standard drafting team will work with stakeholders to review PRC-002 and each of the current regional disturbance monitoring equipment requirements to determine which requirements should be continent-wide requirements and which requirements should be included in regional standards. The requirements in PRC-018 will be revised to properly reference these changes.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

Comment Form — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

You do not have to answer all questions. Enter All Comments in Simple Text Format.

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

1. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 — disturbance equipment installation, monitoring, and reporting so that both standards are enforceable and complement one another?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

4. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.

Comments: This proposed standard (SAR) could be considered a technical standard that measures something or provides information to the reliability processes. Failure to meet this standard would not have an immediate effect on reliability. Therefore, the violation risk factors, mitigation time horizon, and violation severity levels should not be as severe as a performance standard. While the standard provides criteria for disturbance monitoring equipment and for collection of data, failure to fully meet these criteria at all times is not a serious reliability concern.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
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E-mail:		
NERC Region		Registered Ballot Body Segment
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<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
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<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input checked="" type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

Group Comments (Complete this page if comments are from a group.)
Group Name: NPCC CP9, Reliability Standards Working Group
Lead Contact: **Guy V. Zito**
Contact Organization: **Northeast Power Coordinating Council**
Contact Segment: **10**
Contact Telephone: **212-840-1070**
Contact E-mail: **gzito@npcc.org**

Additional Member Name	Additional Member Organization	Region*	Segment*
Ralph Rufrano	New York Power Authority	NPCC	1
Ron Falsetti	The IESO, Ontario	NPCC	2
Roger Champagne	TransEnergie HydroQuebec	NPCC	2
Randy Macdonald	New Brunswick System Operator	NPCC	2
Herb Schrayshuen	National Grid US	NPCC	1
Al Adamson	New York State Reliability Council	NPCC	10
Kathleen Goodman	ISO-New England	NPCC	2
David Kiguel	Hydro One Networks	NPCC	1
William Shemley	ISO-New England	NPCC	2
Murale Gopinathan	Northeast Utilities	NPCC	1
Guy V. Zito	NPCC	NPCC	10
Greg Campoli	New York ISO	NPCC	2
Donald Nelson	MA Dept. of Tel. and Energy	NPCC	9
Ed Thompson	ConEd	NPCC	1
Michael Ranalli	National Grid US	NPCC	1
Michael Gildea	Constellation Energy	NPCC	5
Michael Schiavone	National Grid US	NPCC	1

*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 — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

Background Information

This project involves revising the requirements in the following two standards:

- PRC-002 — Define and Document Disturbance Monitoring Equipment Requirements
- PRC-018 — Disturbance Monitoring Equipment Installation and Data Reporting

PRC-002 was a Version 0 standard that was modified solely to add Phase III & IV planning Measures; PRC-018 is a new standard developed as a translation of Phase III & IV measures. As the electric reliability organization begins enforcing compliance with reliability standards under Section 215 of the Federal Power Act in the United States and applicable statutes and regulations in Canada and Mexico, the industry needs a set of clear, measurable, and enforceable reliability standards. The Version 0 standards and the translation of Phase III & IV planning measures, while a good foundation, were translated from historical operating and planning policies and guides that were appropriate in an era of voluntary compliance. However, it is important to update the standards in a timely manner, incorporating improvements to make the standards more suitable for enforcement and to capture prior recommendations that were deferred during the Version 0 translation.

The PRC-002 revision and new PRC-018 were recently approved in 2006. In conjunction with this project, the standard drafting team will collect feedback on the strengths and weaknesses of this set of standards from the Operating and Planning Committees and from compliance personnel. The data collected will be used to modify these standards.

PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The Federal Energy Regulatory Commission has determined that it will not approve PRC-002 in its current form because the requirements are assigned to the Regional Reliability Organization rather than to a functional entity that is an 'owner, operator, or user' of the bulk power system. The requirements in PRC-002 establish requirements for installation of Disturbance Monitoring Equipment (DME) and reporting of disturbance data to facilitate analyses of events and verify system models. This standard addresses some of the recommendations from the studies conducted following the blackout of August 2003.

The standard drafting team will work with stakeholders to review PRC-002 and each of the current regional disturbance monitoring equipment requirements to determine which requirements should be continent-wide requirements and which requirements should be included in regional standards. The requirements in PRC-018 will be revised to properly reference these changes.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

Comment Form — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

You do not have to answer all questions. Enter All Comments in Simple Text Format.

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

1. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 — disturbance equipment installation, monitoring, and reporting so that both standards are enforceable and complement one another?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

4. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.
Comments: No Further Comment at this time.

**Comment Form — 1st Draft of SAR for Disturbance Monitoring
Project 2007-11**

Please use this form to submit comments on the proposed SAR for Disturbance Monitoring. Comments must be submitted by **April 20, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the abbreviation "DME SAR" in the subject line. If you have questions please contact **David Taylor** at David.Taylor@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Calimano	
Organization:	New York Independent System Operator	
Telephone:	518-356-6129	
E-mail:	mcalimano@nysio.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

Background Information

This project involves revising the requirements in the following two standards:

- PRC-002 — Define and Document Disturbance Monitoring Equipment Requirements
- PRC-018 — Disturbance Monitoring Equipment Installation and Data Reporting

PRC-002 was a Version 0 standard that was modified solely to add Phase III & IV planning Measures; PRC-018 is a new standard developed as a translation of Phase III & IV measures. As the electric reliability organization begins enforcing compliance with reliability standards under Section 215 of the Federal Power Act in the United States and applicable statutes and regulations in Canada and Mexico, the industry needs a set of clear, measurable, and enforceable reliability standards. The Version 0 standards and the translation of Phase III & IV planning measures, while a good foundation, were translated from historical operating and planning policies and guides that were appropriate in an era of voluntary compliance. However, it is important to update the standards in a timely manner, incorporating improvements to make the standards more suitable for enforcement and to capture prior recommendations that were deferred during the Version 0 translation.

The PRC-002 revision and new PRC-018 were recently approved in 2006. In conjunction with this project, the standard drafting team will collect feedback on the strengths and weaknesses of this set of standards from the Operating and Planning Committees and from compliance personnel. The data collected will be used to modify these standards.

PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The Federal Energy Regulatory Commission has determined that it will not approve PRC-002 in its current form because the requirements are assigned to the Regional Reliability Organization rather than to a functional entity that is an 'owner, operator, or user' of the bulk power system. The requirements in PRC-002 establish requirements for installation of Disturbance Monitoring Equipment (DME) and reporting of disturbance data to facilitate analyses of events and verify system models. This standard addresses some of the recommendations from the studies conducted following the blackout of August 2003.

The standard drafting team will work with stakeholders to review PRC-002 and each of the current regional disturbance monitoring equipment requirements to determine which requirements should be continent-wide requirements and which requirements should be included in regional standards. The requirements in PRC-018 will be revised to properly reference these changes.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

Comment Form — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

You do not have to answer all questions. Enter All Comments in Simple Text Format.

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

1. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 — disturbance equipment installation, monitoring, and reporting so that both standards are enforceable and complement one another?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments: We agree with the project scope as described in the SAR, however please see response to question 4 below.

3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

4. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.
Comments: Interconnected Phasor Measurement Unit (PMU) networks such as North American SynchroPhasor Initiative (NASPI) are not now covered in PRC-002 and PRC-18. We believe this SAR should be revised to indicate that standards relating to such PMU networks are not to be added in these revisions. We believe there should be a separate standard addressing PMU networks. Our reasons for this position are 1) There is enough for 2007-11 to deal with as it is. 2) Composition of the drafting teams for these two efforts should be different. As already indicated in the NERC Glossary definition of Disturbance Monitoring Equipment (DME), equipment that meets the functional requirements of DME may be identified as a PMU, and any DME may certainly have a PMU output, but PMU network related standards should be addressed in a separate standards document.

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Project 2007-11**

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
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Comment Form — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

*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.

Background Information

This project involves revising the requirements in the following two standards:

- PRC-002 — Define and Document Disturbance Monitoring Equipment Requirements
- PRC-018 — Disturbance Monitoring Equipment Installation and Data Reporting

PRC-002 was a Version 0 standard that was modified solely to add Phase III & IV planning Measures; PRC-018 is a new standard developed as a translation of Phase III & IV measures. As the electric reliability organization begins enforcing compliance with reliability standards under Section 215 of the Federal Power Act in the United States and applicable statutes and regulations in Canada and Mexico, the industry needs a set of clear, measurable, and enforceable reliability standards. The Version 0 standards and the translation of Phase III & IV planning measures, while a good foundation, were translated from historical operating and planning policies and guides that were appropriate in an era of voluntary compliance. However, it is important to update the standards in a timely manner, incorporating improvements to make the standards more suitable for enforcement and to capture prior recommendations that were deferred during the Version 0 translation.

The PRC-002 revision and new PRC-018 were recently approved in 2006. In conjunction with this project, the standard drafting team will collect feedback on the strengths and weaknesses of this set of standards from the Operating and Planning Committees and from compliance personnel. The data collected will be used to modify these standards.

PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The Federal Energy Regulatory Commission has determined that it will not approve PRC-002 in its current form because the requirements are assigned to the Regional Reliability Organization rather than to a functional entity that is an 'owner, operator, or user' of the bulk power system. The requirements in PRC-002 establish requirements for installation of Disturbance Monitoring Equipment (DME) and reporting of disturbance data to facilitate analyses of events and verify system models. This standard addresses some of the recommendations from the studies conducted following the blackout of August 2003.

The standard drafting team will work with stakeholders to review PRC-002 and each of the current regional disturbance monitoring equipment requirements to determine which requirements should be continent-wide requirements and which requirements should be included in regional standards. The requirements in PRC-018 will be revised to properly reference these changes.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

Comment Form — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

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

1. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 — disturbance equipment installation, monitoring, and reporting so that both standards are enforceable and complement one another?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

4. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.
Comments:

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Comment Form — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

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- PRC-002 — Define and Document Disturbance Monitoring Equipment Requirements
- PRC-018 — Disturbance Monitoring Equipment Installation and Data Reporting

PRC-002 was a Version 0 standard that was modified solely to add Phase III & IV planning Measures; PRC-018 is a new standard developed as a translation of Phase III & IV measures. As the electric reliability organization begins enforcing compliance with reliability standards under Section 215 of the Federal Power Act in the United States and applicable statutes and regulations in Canada and Mexico, the industry needs a set of clear, measurable, and enforceable reliability standards. The Version 0 standards and the translation of Phase III & IV planning measures, while a good foundation, were translated from historical operating and planning policies and guides that were appropriate in an era of voluntary compliance. However, it is important to update the standards in a timely manner, incorporating improvements to make the standards more suitable for enforcement and to capture prior recommendations that were deferred during the Version 0 translation.

The PRC-002 revision and new PRC-018 were recently approved in 2006. In conjunction with this project, the standard drafting team will collect feedback on the strengths and weaknesses of this set of standards from the Operating and Planning Committees and from compliance personnel. The data collected will be used to modify these standards.

PRC-002 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The Federal Energy Regulatory Commission has determined that it will not approve PRC-002 in its current form because the requirements are assigned to the Regional Reliability Organization rather than to a functional entity that is an 'owner, operator, or user' of the bulk power system. The requirements in PRC-002 establish requirements for installation of Disturbance Monitoring Equipment (DME) and reporting of disturbance data to facilitate analyses of events and verify system models. This standard addresses some of the recommendations from the studies conducted following the blackout of August 2003.

The standard drafting team will work with stakeholders to review PRC-002 and each of the current regional disturbance monitoring equipment requirements to determine which requirements should be continent-wide requirements and which requirements should be included in regional standards. The requirements in PRC-018 will be revised to properly reference these changes.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

Comment Form — 1st Draft of SAR for Disturbance Monitoring Project 2007-11

You do not have to answer all questions. Enter All Comments in Simple Text Format.

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

1. Do you believe that there is a reliability-related need to address revisions to PRC-002 and PRC-018 — disturbance equipment installation, monitoring, and reporting so that both standards are enforceable and complement one another?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

2. Do you agree with the scope of the proposed project (the scope includes all the items noted in the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

3. Are there additional revisions beyond those identified in the SAR that should be addressed within the scope of this Project 2007-11?

Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments: The question should say if commenter said "yes", provide supporting information.

4. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.

Comments:

**Comment Form — 1st Draft of SAR for Disturbance Monitoring
Project 2007-11**

Please use this form to submit comments on the proposed SAR for Disturbance Monitoring. Comments must be submitted by **April 20, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the abbreviation "DME SAR" in the subject line. If you have questions please contact **David Taylor** at David.Taylor@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

**Comment Form — 1st Draft of SAR for Disturbance Monitoring
Project 2007-11**

Group Comments (Complete this page if comments are from a group.)			
Group Name:	WECC Disturbance Monitoring Work Group		
Lead Contact:	Donald Davies		
Contact Organization:	WECC		
Contact Segment:	10 - RROs and REs		
Contact Telephone:	801-582-0353		
Contact E-mail:	donald@wecc.biz		
Additional Member Name	Additional Member Organization	Region*	Segment*
Peter Mackin	Utility System Efficiencies, Inc.	WECC	8
Abraham Ellis	Public Service Company of New Mexico	WECC	1
Bharat Bhargava	Southern California Edison Company	WECC	1
Bill Miller	Pacific Gas and Electric Company	WECC	1
William Mittelstadt	Retired	WECC	
Dan Hamai	Western Area Power Administration	WECC	1
Darren McCrank	Alberta Electric System Operator	WECC	2
Doug Selin	Arizona Public Service Company	WECC	1
Fabio Rodriguez	PacifiCorp	WECC	1
Fred Henderson	Pacific Gas and Electric Company	WECC	1
Harry Lee	British Columbia Hydro and Power Authority	WECC	5
James Burns	Bonneville Power Administration	WECC	1
John Hauer	Retired	WECC	
John Hernandez	Salt River Project	WECC	1
John Kehler	Alberta Electric System Operator	WECC	2
Ken Martin	Bonneville Power Administration	WECC	1
Mike Kwok	British Columbia Transmission Corporation	WECC	1
Paqtrick Truong	California Independent System Operator	WECC	2

**Comment Form — 1st Draft of SAR for Disturbance Monitoring
Project 2007-11**

Rikin Shah	NorthWestern Energy	WECC	1

*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.

Background Information

This project involves revising the requirements in the following two standards:

- PRC-002 — Define and Document Disturbance Monitoring Equipment Requirements
- PRC-018 — Disturbance Monitoring Equipment Installation and Data Reporting

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**Comment Form — 1st Draft of SAR for Disturbance Monitoring
Project 2007-11**

establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

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Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

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Yes

No

If "No," please explain why in the comment area below and provide supporting information. Comments:

4. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.
Comments: