

Comments on Reliability Standards Errata

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

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

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

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

Index to Questions, Comments, and Responses

1. There are several approved NERC standards that contain errors that have been identified as errata. If you disagree with this determination, please identify the specific standard that includes the errata, and the material impact of not accepting the error as errata. 5

Consideration of Comments on Various Reliability Standards Errata

The Industry Segments are:

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

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

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

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

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

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

Summary Consideration:

Organization	Question 1:	Question 1 Comments:
NPCC RSC	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	Note that in EOP-002-2 Capacity and Energy Emergencies there is an error in the errata. In Version 1 of the Version History, there is an erroneous date of Sept. 19, 2008.
Manitoba Hydro	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	EOP-002-2 - Although adding "Load Serving Entity" in the Applicability List is a stretch for an errata we believe it can be justified being that from day one the Attachment 1 clearly includes the Load Serving Entity. MOD-006-0 - Should also change "preservation" to "reservation" in M1 and M2
FirstEnergy Corp.	No - I do not agree that the noted errors in the reliability standards are correctly identified as errata.	EOP-004: Attachment 2 needs a complete re-write to explain the new DOE oe-417 form. The only change I saw was to change EIA to OE. It currently doesn't show the 1 & 6 hour reporting requirements of the new DOE oe-417 report. I feel this might be more than an errata change.
FirstEnergy Corp.	No - I do not agree that the noted errors in the reliability standards are correctly identified as errata.	<p>BAL-006-1: Version history wording should be revised from, "Added following to "Effective Date:" and footer This standard will expire for one year beyond the effective date..." This standard will expire one year beyond the effective date... The other proposed errata should be reviewed for this same condition and adjusted as needed.</p> <p>EOP-004-1: In EOP-004-1 one instance of EIA-417 was not changed to OE-417 on page 10 of 17 in the paragraph that begins, "Form EIA-417 must be submitted..."</p> <p>EOP-004-1 Att. 2 - The nine (9) items listed at the bottom of pg. 10 and top of pg. 11 should match the OE-417 document which lists the following twelve (12) items:</p> <ol style="list-style-type: none"> 1. Actual physical attack that causes major interruptions or impacts to critical infrastructure facilities or to operations 2. Actual cyber or communications attack that causes major interruptions of electrical system operations 3. Complete operational failure or shut-down of the transmission and/or distribution electrical system

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		<p>4. Electrical System Separation (Islanding) where part or parts of a power grid remain(s) operational in an otherwise blacked out area or within the partial failure of an integrated electrical system</p> <p>5. Uncontrolled loss of 300 Megawatts or more of firm system loads for more than 15 minutes from a single incident</p> <p>6. Load shedding of 100 Megawatts or more implemented under emergency operational policy</p> <p>7. System-wide voltage reductions of 3 percent or more</p> <p>8. Public appeal to reduce the use of electricity for purposes of maintaining the continuity of the electric power system</p> <p>9. Suspected physical attacks that could impact electric power system adequacy or reliability; or vandalism which target components of any security systems</p> <p>10. Suspected cyber or communications attacks that could impact electric power system adequacy or vulnerability</p> <p>11. Loss of electric service to more than 50,000 customers for 1 hour or more</p> <p>12. Fuel supply emergencies that could impact electric power system adequacy or reliability</p> <p>Also, the first sentence of the next paragraph following the list of system failures and interruptions (as shown above) should be revised as follows to reflect the 1hr and 6hr requirements of the DOE form:</p> <p>"The initial DOE Emergency Incident and Disturbance Report (form OE-417 – Schedule 1) shall be submitted to the DOE Operations Center within 60 minutes of the time of the system disruption if any of the Items 1-8 are checked, but may be extended to within 6 hours if ONLY one or more of the Items in 9-12 are checked."</p> <p>Implementation Plan for FAC-010-1, FAC-011-1 and FAC-014-1: On Pg.4 of the implementation plan, the effective date is showing timelines after BOT approval. But technically, the effective date is a timeframe after regulatory approval, or in those jurisdictions not requiring regulatory approval, then a timeframe after BOT approval.</p> <p>IRO-001-1: Why does A.5. state: "(Proposed) Effective Date" - Shouldn't it say "Effective Date"?</p> <p>General to all Standards: We believe the effective dates shown in each standard reflect regulatory approval. For instance, all of the initial 83 standards were approved by FERC per order 693 and effective March 2007. It should be clear in the standards what the actual regulatory "approval" dates are versus the actual "effective" dates which may be a</p>
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		timeframe after approval due to implementation periods.
Bonneville Power Administration	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
City of Tallahassee	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Ameren	No - I do not agree that the noted errors in the reliability standards are correctly identified as errata.	Concerning the 'Description of Correction' related to EOP-004-1, Disturbance Reporting: the statement incorrectly refers to Form OE-411. It should be Form OE-417 instead. As a result the Version History in the referenced Standard is correspondingly incorrect.
Ontario IESO	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	The IESO supports these errata changes.
MRO NERC Standards Review Subcommittee (NSRS)	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	Also note the following discrepancies: EOP-002-2, under Version History, version 1, the date may be wrong, "September 19, 2008" (?), this may be a type-o, possibly should read "2006". EOP-004-1, under Version History, version 1, under Action, the form (OE-411) that is referenced is not contained in the Standard; Possible a type-o, possibly should read "Form OE 417".
Xcel Energy	No - I do not agree that the noted errors in the reliability standards are correctly identified as errata.	EOP-002-2 There appears to be no indication that Load Serving Entities (LSE) was "inadvertently omitted" from the applicability section of the standard. This type of "error" is substantial and should be vetted through the standards development process. Furthermore, an updated version, including LSEs, should not be posted until this has received proper approval. Recommend removing the updated version from the website immediately. In addition to the identified errata, we would like to point out these 2 additional errata: EOP-002-2 Version history date of Sept. 19, 2008 should be Sept. 19, 2006. MOD-006-0 The word "preservation" should be corrected to "reservation" in the Measures, in addition to the Requirements.
American Transmission Company		All of the standards list in this errata proceeding should have its version number updated in order to indicate that a change occurred. BAL-001-0a changes to BAL-001-1a BAL-003-0a changes to BAL-003-1a BAL-005-0a changes to BAL-005-1a BAL-006-1 changes to BAL-006-2 COM-001-1 changes to COM-001-2 EOP-002-2 changes to EOP-002-3.....etc
U.S. Department of Reclamation	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	In reference to TPL-001-0. The errata corrected the reference in M1 to read TPL-001-0 R1 and TPL-001-0 R2. The reference to R2 however is incorrect. R2 requires that Planning Authority and Transmission Planner shall provide a written summary and not a valid assessment and corrective plans as referenced in M1.
Dominion Resources, Inc.	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Midwest ISO, Inc.	Yes - I do agree that the noted errors in	

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	the reliability standards are correctly identified as errata.	
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