

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

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This form is to be used to submit comments on the proposed *Provide Missing Measures and Compliance Elements in Existing Standards* Standard Authorization Request. Comments must be submitted by **June 8, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “V0 Compliance Elements: SAR Comments” in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	John Horakh 06-06-2005
Organization:	MAAC
Telephone:	609-625-6014
Email:	john.horakh@conectiv.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input checked="" type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
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<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



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During the postings of Version 0 Standards, many stakeholders expressed concern with the missing compliance elements. The Version 0 Standard Drafting Team recognized the deficiencies, but was constrained by the instructions to develop the V0 Standards based solely on existing policies and standards. The V0 Drafting Team recommended that adding the missing compliance elements receive a high priority after approval of the Version 0 Standards. The accompanying SAR provides a listing and a prioritized schedule for developing the missing measures and compliance elements.

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

Yes

No

**Please provide any additional comments:**

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

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

Yes

No

**Please provide any explanation below:**

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

Yes

No

**Please provide any explanation or suggested modifications below:**

Add one year to every item in the schedule. The first item would become:

Reliability Standards to revise in 2006 for implementation in 2007.

There is already too much work in 2005, to add more is unreasonable

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**Question 5: Do you have any additional comments regarding the SAR that you believe should be addressed?**

Yes

No

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Kathy Davis	
Organization:	Tennessee Valley Authority	
Telephone:	423-751-6172	
Email:	kadavis@tva.gov	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
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<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	



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

Yes

No

**Please provide any additional comments:**

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

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

Yes

No

**Please provide any explanation below:**

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

Yes

No

**Please provide any explanation or suggested modifications below:**

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**Question 5: Do you have any additional comments regarding the SAR that you believe should be addressed?**

Yes

No

**If yes, please share those comments in the space provided below.**

The need for measurable compliance elements is obvious. What is not so obvious is that such elements might involve significant effort on the industry participants to monitor or document compliance. It is possible that it will be necessary to field test any such measure and TVA suggests incorporating that thought process into the development of these measures

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Ed Riley	
Organization:	California ISO	
Telephone:	(916) 351-4463	
Email:	eriley@caiso.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners	
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils	
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**Question 1: Do you agree there is a reliability need to address missing and deficient elements in the Version 0 Reliability Standards?**

Yes

No

**Please provide any additional comments:**

We believe that the task should be limited to identifying and prioritizing the missing Measures and Compliance Elements in Version 0. Other modifications to any standard should be developed through the NERC Standards Develop Process.

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**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

The scope of the SAR is somewhat unclear. The Title and Purpose/Industry Need sections are clear that the scope is to add missing Measures and Compliance Elements to the Version 0 Reliability Standards. At the end of the Detailed Description section it indicates that existing requirements and measures should also be reviewed. We disagree with reviewing the existing requirements and measures as part of this SAR. Provision for this activity is covered in the NERC Standards Process Manual.

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

Yes

No

**Please provide any explanation below:**

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

Yes

No

**Please provide any explanation or suggested modifications below:**

We are unclear if this SAR is proposing that one SDT would work for four years and do all of the work or would there be a new SDT for each year. We would also like to propose that possibly two SDT's could work on this at the same time and this project could be completed in two years instead of four. We also feel that it will be important to keep the size of these SDT's on the smaller side to help facilitate the work. It is also very important that the proposed additions / changes be balloted and approved by the industry.

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Yes

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We believe that this SAR should include a schedule and priority.

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Edward Stein
Organization:	FirstEnergy Solutions
Telephone:	330-315-7480
Email:	steine@firstenergycorp.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input checked="" type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
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**Question 1: Do you agree there is a reliability need to address missing and deficient elements in the Version 0 Reliability Standards?**

Yes

No

**Please provide any additional comments:**

During the Version '0' process no measure or compliance requirements were added to existing standards. Certain standards need to have measure and compliance elements made part of the standard. The existing standards need to be reviewed and amended as necessary to include measures and compliance requirements.

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**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

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

Yes

No

**Please provide any explanation below:**

Any Standard without a measure needs to be part of this SAR. If no measure can be defined then the Standard is not a true standard and should be eliminated.

FAC-003-0 Vegetation Management should be considered for inclusion in the SAR. The addition of compliance measures would aid in insuring a focus on reliability in the area.

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

Yes

No

**Please provide any explanation or suggested modifications below:**

TOP-001-0, Reliability Responsibilities and Authorities, is the foundation of reliability and needs to be completed in the first phase. No matter how well Operations Planning and Transmission Operations are defined and detailed, reliability is nothing without having the Transmission Operator recognize that he or she has the 'responsibility and clear decision-making authority to take whatever action are needed to ensure reliability'. CIP-001-0 Sabotage Reporting of suspected sabotage is much less a threat to reliability than a Transmission Operator without clear decision-making authority.

CIP-001-0 Sabatoge Reporting should exchange places with TOP-001-0 Reliability Responsibilities and Authorities if the 2009 schedule is to be maintained. A clear understanding and measure of responsibility and authority provides a direct effect on and greater assurance of reliability than measuring whether sabatoge reporting is accurate and appropriate.

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**Question 5: Do you have any additional comments regarding the SAR that you believe should be addressed?**

Yes

No

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Reliability measures and compliance criteria need to be clearly defined and must meet the specific intent of the standard. Appropriate measurers must be consistent with truly measurable criteria. Compliance criteria in certain standards may need to have a phased in application process that is in line with the registration of responsible entities. Implementation of measures and compliance elements needs to consider some allowance of time to allow entities to come into compliance. Not having any measures existing makes it difficult to gauge compliance other than a current interpretation of what that might be.

Waiting until 2009 for implementation of reliability measures of reliability standards is totally unacceptable. The Industry has to make reliability a priority and define and implement measures for all Reliability Standards by 2007.

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

**Group Name:** Midwest Reliability Organization  
**Lead Contact:** Todd Gosnell  
**Contact Organization:** Midwest Reliability Organization  
**Contact Segment:** 2  
**Contact Telephone:** 402-552-5670  
**Contact Email:** wgosnell@oppd.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Terry Bilke	MISO	MRO	2
Rober Coish	MHEB	MRO	2
Dennis Florom	LES	MRO	2
Ken Goldsmith	ALT	MRO	2
Todd Gosnell	OPPD	MRO	2
Alan Boesch	NPPD	MRO	2
Jim Maenner	WPS	MRO	2
Darrick Moe	WAPA	MRO	2
Tom Mielnik	MEC	MRO	2
Joe Knight	MRO	MRO	2
The 31 Additional MRO Member	Companies not named above	MRO	2

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

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Yes

No

**Please provide any explanation below:**

BAL-003-0 has measures with no compliance.

BAL-004-0 doesn't have measures or compliance.

BAL-005-0 and BAL-006-0 has compliance with no measures.

EOP-005-0 has compliance but no measures.

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

Yes

No

**Please provide any explanation or suggested modifications below:**

As the compliance elements and measures are added to the Reliability Standards, the MRO feels strongly that they should go through the full Standards process to solicit Stakeholder input and approval.

The MRO has a concern about the length of time proposed to complete the missing compliance elements in Version 0 Standards. Having important compliance elements missing from a Standard is a reliability and credibility concern. It is proposed that the CCMC first prepare a detailed template defining the required contents in each compliance element. Using this guide should make the SAR scope of work take less time to accomplish and result in a more consistent higher quality set of industry standards. The missing compliance elements should be completed within a year.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 5: Do you have any additional comments regarding the SAR that you believe should be addressed?**

Yes

No

**If yes, please share those comments in the space provided below.**

EOP-002-0 and IRO-001-0 They are on the list to be evaluated but contain both measurements and compliance. Is it the intent of the SDT to revise the measures and compliance elements that are currently existing in these Standards?

While reviewing the Standards the CCMC should consider or propose elimination of standard requirements that cannot be measured.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Alan Adamson	
Organization:	New York State Reliability Council (NYSRC)	
Telephone:	(518) 355-1937	
Email:	aadamson@nycap.rr.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners	
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils	
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities	
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<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users	
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users	
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities	
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		



## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

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### Background Information:

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During the postings of Version 0 Standards, many stakeholders expressed concern with the missing compliance elements. The Version 0 Standard Drafting Team recognized the deficiencies, but was constrained by the instructions to develop the V0 Standards based solely on existing policies and standards. The V0 Drafting Team recommended that adding the missing compliance elements receive a high priority after approval of the Version 0 Standards. The accompanying SAR provides a listing and a prioritized schedule for developing the missing measures and compliance elements.

The CCMC would like to receive industry comments on this SAR and to obtain the input of the industry regarding prioritization of the elements of the SAR. Accordingly, we request your comments included on this form, emailed with the subject “V0 Compliance Elements: SAR Comments” by June 8, 2005.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any additional comments:**

The New York State Reliability Council (NYSRC) agrees with prioritizing and identifying missing and deficient compliance elements and measures from the existing Version 0 standards, only. Other issues should be addressed in Version 1.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

The NYSRC agrees with the scope of the SAR; however, the title is misleading. The SAR will allow the Drafting Teams to go beyond the addition of the missing compliance measures and elements and perhaps open a full review of the identified Version 0 Standards.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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

Yes

No

**Please provide any explanation below:**

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

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

Yes

No

**Please provide any explanation or suggested modifications below:**

1. The SAR should provide the basis for its recommended schedule.
2. The SAR states that the Version 0 SDT recommended that the modifications be developed on a high priority basis. It appears to us that taking up to four years to make these changes, as proposed in the SAR, can hardly be considered high priority implementation. If NERC still considers this project to be of high priority, perhaps it should evaluate the priority of all other proposed standards together with those recommended in this SAR, for the purpose of developing a comprehensive implementation schedule for ALL standards.
3. We specifically recommend that the schedule for modifying EOP-006-0, which is scheduled in the SAR to be modified in 2007, be advanced because of the important need of this system restoration standard.
4. We recommend that the COM-002-0 Standard should be moved up in priority. These COM standards outline requirements, needs and availability of adequate and reliable telecommunication facilities for exchange of interconnection and operating information. These are critical standards requiring priority compliance measures and therefore should be moved up/added into the higher priority/stage 1 category.

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

**Question 5: Do you have any additional comments regarding the SAR that you believe should be addressed?**

Yes

No

**If yes, please share those comments in the space provided below.**

See our comment to the title of the SAR in Question 2.

We also believe that, although there is value in this SAR showing schedule and priority, there should be a separate SAR for each standard to outline what will be done and frame the Drafting Team's work appropriately and ensure coordination with Version 1.

In addition, the NYSRC requests the Drafting Team to clarify why standards such as (EOP-002-0, IRO-001-0) with Measure and compliance elements missing were included in this effort while, at the same time, there seems to be an omission of some standards such as (EOP-005-0, BAL-003-0 to BAL-006-0) that are missing those same elements.

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Alan Gale
Organization:	City of Tallahassee
Telephone:	(850) 891-3025
Email:	galea@talgov.com
<b>NERC Region</b>	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
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## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

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### Background Information:

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During the postings of Version 0 Standards, many stakeholders expressed concern with the missing compliance elements. The Version 0 Standard Drafting Team recognized the deficiencies, but was constrained by the instructions to develop the V0 Standards based solely on existing policies and standards. The V0 Drafting Team recommended that adding the missing compliance elements receive a high priority after approval of the Version 0 Standards. The accompanying SAR provides a listing and a prioritized schedule for developing the missing measures and compliance elements.

The CCMC would like to receive industry comments on this SAR and to obtain the input of the industry regarding prioritization of the elements of the SAR. Accordingly, we request your comments included on this form, emailed with the subject “V0 Compliance Elements: SAR Comments” by June 8, 2005.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any additional comments:**

If it is important enough to be a standard, there should be compliance elements. If there are no compliance elements necessary, then delete the standard.

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

EOP-002-0 Capacity and Energy Emergencies already contains Measures and Compliance elements. Modification of these elements should be a separate SAR since this SAR is to address missing elements only.

IRO-001-0 Reliability Coordination - Responsibilities and Authorities already contains Measures and Compliance elements. Modification of these elements should be a separate SAR since this SAR is to address missing elements only.

Additionally,

Breaking the SAR into multiple SAR's will provide an additional level of flexibility to accommodate other standards development efforts that should be paralleling a particular standard.

We rushed to complete Version 0 and did them all at once, voting all or none. We should not rush in our goal of "adding missing compliance measures". Throwing in the catch phrase of "however, the entire standard should be reviewed to ensure that existing requirements and measures meet the definitions identified in the NERC Reliability Standards Process Manual" is not a strong enough commitment to do an adequate review of all the elements in the time frame suggested. There are several comments, or sticking points, that were uncovered in the Version 0 conversion that did not result in a "clear and unambiguous" translation that should be addressed in the Version 1 of any standard that needs to be changed for any reason, including the addition of compliance elements.

The individual SARs will also provide a focused view on each standard which will speed up the process of developing, drafting, reviewing and commenting on missing compliance elements to the Version "0" standards. I feel this approach would be more practical than what is being proposed in this "group" SAR and will result in implementation of "missing compliance elements" in a shorter time schedule than is being proposed.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any explanation below:**

BAL-004-0, Time Error Correction, does not contain Measures or Compliance elements. Although this standard may become a NAESB business practice, some element of reliability will remain.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any explanation or suggested modifications below:**

In addition to the comments in question 2:

If you delete the standards identified in question 2, the spread becomes 3/4/7/5.

While this is a good amount for 2005 considering that it is already June, EOP-003-0, Load Shedding Plans, should be evaluated before 2007. The failure to shed load was identified as a key contributor to the August 14, 2003 blackout and compliance should be addressed sooner rather than later. This would make the spread 4/4/6/5.

BAL-004-0 could be added to 2006 to make the final spread 4/5/6/5.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 5: Do you have any additional comments regarding the SAR that you believe should be addressed?**

Yes

No

**If yes, please share those comments in the space provided below.**

The last paragraph in the Detailed Description states that "the entire standard will be reviewed to ensure that the existing requirements and measures meet the definitions identified in the NERC Reliability Standards Process Manual." What "defenitions" are referenced here?

Would a better statement be "the entire standard will be reviewed to ensure that the existing requirements and measures meet the elements identified in the NERC Reliability Standards Process Manual"?

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

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(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
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<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

**Group Name:** Midwest Reliability Organization  
**Lead Contact:** Todd Gosnell  
**Contact Organization:** Midwest Reliability Organization  
**Contact Segment:** 2  
**Contact Telephone:** 402-552-5670  
**Contact Email:** wgosnell@oppd.com

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Terry Bilke	MISO	MRO	2
Rober Coish	MHEB	MRO	2
Dennis Florom	LES	MRO	2
Ken Goldsmith	ALT	MRO	2
Todd Gosnell	OPPD	MRO	2
Alan Boesch	NPPD	MRO	2
Jim Maenner	WPS	MRO	2
Darrick Moe	WAPA	MRO	2
Tom Mielnik	MEC	MRO	2
Joe Knight	MRO	MRO	2
The 31 Additional MRO Member	Companies not named above	MRO	2

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

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**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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

Yes

No

**Please provide any additional comments:**

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any explanation below:**

BAL-003-0 has measures with no compliance.

BAL-004-0 doesn't have measures or compliance.

BAL-005-0 and BAL-006-0 has compliance with no measures.

EOP-005-0 has compliance but no measures.

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

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

Yes

No

**Please provide any explanation or suggested modifications below:**

As the compliance elements and measures are added to the Reliability Standards, the MRO feels strongly that they should go through the full Standards process to solicit Stakeholder input and approval.

The MRO has a concern about the length of time proposed to complete the missing compliance elements in Version 0 Standards. Having important compliance elements missing from a Standard is a reliability and credibility concern. It is proposed that the CCMC first prepare a detailed template defining the required contents in each compliance element. Using this guide should make the SAR scope of work take less time to accomplish and result in a more consistent higher quality set of industry standards. The missing compliance elements should be completed within a year.

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Yes

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EOP-002-0 and IRO-001-0 They are on the list to be evaluated but contain both measurements and compliance. Is it the intent of the SDT to revise the measures and compliance elements that are currently existing in these Standards?

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NERC Region		Registered Ballot Body Segment
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**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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

Yes

No

**Please provide any additional comments:**

NPCC participating members agree with prioritizing and identifying missing and deficient compliance elements and measures from the existing Version 0 standards, only. Other issues should be addressed in Version 1.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

NPCC participating members agree with the scope of the SAR however the title is misleading. The SAR will allow the Drafting Teams to go beyond the addition of the missing compliance measures and elements and perhaps open a full review of the identified Version 0 Standards.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any explanation below:**

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any explanation or suggested modifications below:**

NPCC participating members believe COM-002-0 Standard should be moved up in priority. These COM-standards outline requirements, needs and availability of adequate and reliable telecommunication facilities for exchange of interconnection and operating information. These are critical standards requiring priority compliance measures and therefore should be moved up/added into the higher priority/stage 1 category.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 5: Do you have any additional comments regarding the SAR that you believe should be addressed?**

Yes

No

**If yes, please share those comments in the space provided below.**

See our comment to the title of the SAR.

NPCC participating members also believe that although there is value in this SAR showing schedule and priority there should be a separate SAR for each standard to outline what will be done and frame the Drafting Team's work appropriately and ensure coordination with Version 1.

In addition NPCC requests the Drafting Team to clarify why standards such as (EOP-002-0, IRO-001-0) with Measure and compliance elements missing were included in this effort while, at the same time, there seems to be an omission of some standards such as (EOP-005-0, BAL-003-0 to BAL-006-0) that are missing those same elements.

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

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Ron Falsetti / Khaqan Khan	
Organization:	Independent Electricity system Operator (IESO), Ontario	
Telephone:	905-855-6187	
Email:	Ron. Falsetti@ieso.ca	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners	
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils	
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities	
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities	
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators	
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers	
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users	
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users	
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities	
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		



## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

### Background Information:

Posted for comment is the initial draft of the *Provide Missing Measures and Compliance Elements in Existing Standards* SAR that attempts to identify and prioritize the deficient or missing measures and compliance elements in the V0 standards. The translation to Version 0 Reliability Standards was limited to include only existing requirements, measures and compliance elements from the planning standards and operating policies. Because the development was limited to translation of existing elements, the V0 standards were adopted with several known deficiencies, specifically in the area of measures and compliance elements. The Compliance and Certification Managers Committee (CCMC) has reviewed the Version 0 standards in order to identify and prioritize the missing measures and compliance elements. Revisions to these standards are needed to enable inclusion of these standards in the Compliance Monitoring Program.

During the postings of Version 0 Standards, many stakeholders expressed concern with the missing compliance elements. The Version 0 Standard Drafting Team recognized the deficiencies, but was constrained by the instructions to develop the V0 Standards based solely on existing policies and standards. The V0 Drafting Team recommended that adding the missing compliance elements receive a high priority after approval of the Version 0 Standards. The accompanying SAR provides a listing and a prioritized schedule for developing the missing measures and compliance elements.

The CCMC would like to receive industry comments on this SAR and to obtain the input of the industry regarding prioritization of the elements of the SAR. Accordingly, we request your comments included on this form, emailed with the subject “V0 Compliance Elements: SAR Comments” by June 8, 2005.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any additional comments:**

We agree with the need to prioritize and address missing and deficient compliance elements, measures and levels of non-compliance from the existing Version 0 Reliability standards. It is our position however, other issues with these standards be addressed in the Version 1 standards being developed.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

We agree with the scope of the SAR however the title is misleading. The current title tends to allow the Drafting Teams to go beyond the addition of the missing compliance measures and elements. Perhaps even open a full review of the identified Version 0 Standards. The title should therefore be revised to address our concern.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any explanation below:**

There are several other standards (including BAL-003-0 to BAL-006-0 and EOP-005-0) that are missing either one or both the Measures and/or Compliance elements. We suggest that NERC SDT should review these standards to assess whether their inclusion is required in this SAR.

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

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

Yes

No

**Please provide any explanation or suggested modifications below:**

1). We suggest standards COM-001-0 and COM-002-0 be moved from the Stage 3 category and be added/included in priority stage 1 category (re: pertaining to revision in 2005 and its implementation in 2006). These COM-standards outline requirements, needs and availability of adequate and reliable telecommunication facilities for exchange of interconnection and operating information. These are critical standards requiring priority compliance measures and therefore should be moved to priority/stage 1 category.

2). Some of the standards mentioned under the staged priority listing already include compliance measures and non-compliance levels (such as: EOP-002-0, IRO-001-0). It needs to be clarified whether the intention for including such standards is to revise the existing compliance measures and/or levels. We suggest that priority should be given to those standards that do-not have any compliance measures/levels at all, unless there is a critical reliability related need for revision in already existing compliance measures.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 5: Do you have any additional comments regarding the SAR that you believe should be addressed?**

Yes

No

**If yes, please share those comments in the space provided below.**

Although there is value in this SAR with respect to identifying the schedule and priority, we are of the opinion there should be a separate SAR for each standard that outlines what will be done, frame the Drafting Team's work appropriately and ensure coordination with Version 1 for each.

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

This form is to be used to submit comments on the proposed *Provide Missing Measures and Compliance Elements in Existing Standards* Standard Authorization Request. Comments must be submitted by **June 8, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “V0 Compliance Elements: SAR Comments” in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Kathleen Goodman
Organization:	ISO New England
Telephone:	(413) 535-4111
Email:	kgoodman@iso-ne.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
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<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

### Background Information:

Posted for comment is the initial draft of the *Provide Missing Measures and Compliance Elements in Existing Standards* SAR that attempts to identify and prioritize the deficient or missing measures and compliance elements in the V0 standards. The translation to Version 0 Reliability Standards was limited to include only existing requirements, measures and compliance elements from the planning standards and operating policies. Because the development was limited to translation of existing elements, the V0 standards were adopted with several known deficiencies, specifically in the area of measures and compliance elements. The Compliance and Certification Managers Committee (CCMC) has reviewed the Version 0 standards in order to identify and prioritize the missing measures and compliance elements. Revisions to these standards are needed to enable inclusion of these standards in the Compliance Monitoring Program.

During the postings of Version 0 Standards, many stakeholders expressed concern with the missing compliance elements. The Version 0 Standard Drafting Team recognized the deficiencies, but was constrained by the instructions to develop the V0 Standards based solely on existing policies and standards. The V0 Drafting Team recommended that adding the missing compliance elements receive a high priority after approval of the Version 0 Standards. The accompanying SAR provides a listing and a prioritized schedule for developing the missing measures and compliance elements.

The CCMC would like to receive industry comments on this SAR and to obtain the input of the industry regarding prioritization of the elements of the SAR. Accordingly, we request your comments included on this form, emailed with the subject “V0 Compliance Elements: SAR Comments” by June 8, 2005.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any additional comments:**

ISO-NE agrees with prioritizing and identifying missing and deficient compliance elements and measures from the existing Version 0 standards, only. Other issues should be addressed in Version 1.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

ISO-NE agrees with the scope of the SAR; however, the title is misleading. The SAR will allow the Drafting Teams to go beyond the addition of the missing compliance measures and elements and perhaps open a full review of the identified Version 0 Standards. Although this may be the desired outcome and acceptable to industry members, we believe it should be clarified within the posting of this proposed SAR.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any explanation below:**

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any explanation or suggested modifications below:**

ISO-NE believes COM-002-0 Standard should be moved up in priority. These COM-standards outline requirements, needs and availability of adequate and reliable telecommunication facilities for exchange of interconnection and operating information. These are critical standards requiring priority compliance measures and therefore should be moved up/added into the higher priority/stage 1 category.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 5: Do you have any additional comments regarding the SAR that you believe should be addressed?**

Yes

No

**If yes, please share those comments in the space provided below.**

See our comment to the title of the SAR.

ISO-NE believes that, although there is value in this SAR showing schedule and priority, there should be a separate SAR for each standard to outline what will be done and frame the Drafting Team's work appropriately and ensure coordination with Version 1.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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(Complete this page for comments from one organization or individual.)		
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Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
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<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		



## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

### Background Information:

Posted for comment is the initial draft of the *Provide Missing Measures and Compliance Elements in Existing Standards* SAR that attempts to identify and prioritize the deficient or missing measures and compliance elements in the V0 standards. The translation to Version 0 Reliability Standards was limited to include only existing requirements, measures and compliance elements from the planning standards and operating policies. Because the development was limited to translation of existing elements, the V0 standards were adopted with several known deficiencies, specifically in the area of measures and compliance elements. The Compliance and Certification Managers Committee (CCMC) has reviewed the Version 0 standards in order to identify and prioritize the missing measures and compliance elements. Revisions to these standards are needed to enable inclusion of these standards in the Compliance Monitoring Program.

During the postings of Version 0 Standards, many stakeholders expressed concern with the missing compliance elements. The Version 0 Standard Drafting Team recognized the deficiencies, but was constrained by the instructions to develop the V0 Standards based solely on existing policies and standards. The V0 Drafting Team recommended that adding the missing compliance elements receive a high priority after approval of the Version 0 Standards. The accompanying SAR provides a listing and a prioritized schedule for developing the missing measures and compliance elements.

The CCMC would like to receive industry comments on this SAR and to obtain the input of the industry regarding prioritization of the elements of the SAR. Accordingly, we request your comments included on this form, emailed with the subject “V0 Compliance Elements: SAR Comments” by June 8, 2005.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any additional comments:**

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

### Question 2: Do you agree with the scope of the proposed modifications?

Yes

No

#### Please provide any explanation below:

We agree with the overall concept of the scope. However the scope itself has several parts, is vague, and is inconsistent and too broad.

1) One part of the scope is the annual selection of standards for revision and the process for revising that selection. The overall annual plan as presented is satisfactory. The annual review of which standards will be revised and the submittal of a SAR to change which standards are reviewed for a specific year is a good process.

2) A second part of the scope of this SAR is the scope of the work that will be accomplished for each standard during the revision under this SAR. The vagueness stems from the scope of the work on each of the individual standards. The first paragraph of the Detailed Description contains the statement that many existing standards are "missing measures and compliance elements". The next sentence contains the statement that revisions to these standards are needed to complete the missing "elements" defined in the RSPM and to enable inclusion in the Compliance Monitoring Program. Does this second use of the term "elements" include "missing measures and compliance elements", or just "compliance elements"? We suggest it include "missing measures and compliance elements".

3) The real scope of work on each individual standard seems to be included in the first statement of the last paragraph: "In all cases, the focus of the revision should be the inclusion of the missing information." We suggest the wording of this scope be changed to:

"In all cases, the focus of the revision will be to review and revise measures and compliance elements for relevancy, severity, and consistency."

4) The "inconsistent and too broad" part of the scope of this SAR is contained in the last sentence "however, the entire standard should be reviewed to ensure that the existing requirements and measures meet the definitions identified in the NERC Reliability Standards Process Manual." We disagree with giving this much prerogative to these drafting teams. Please delete this part of the scope. An new SAR should be submitted to change the Requirements of a standard if these drafting teams think the existing Requirements should be changed. This SAR and standards development should be limited to adding "measures and compliance elements".

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any explanation below:**

All measures and compliance elements of the NERC Standards should be reviewed and revised as needed to ensure relevency, severity and consistency throughout all the Standards.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any explanation or suggested modifications below:**

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

**Question 5: Do you have any additional comments regarding the SAR that you believe should be addressed?**

Yes

No

**If yes, please share those comments in the space provided below.**

The ongoing process for development, review, commenting and revision of these standards is not stated. We have presumed that the ongoing process will follow the NERC Reliability Standards Process Manual. Is that correct? If not we strongly suggest the ongoing process for changing these standards under this SAR continue to following the NERC RSPM. Any desired changes to the measures and compliance elements of these standards should be reviewed and voted on by all interested RBB members using the existing NERC standards process. Any proposed Standards Requiements changes should be processed as new SARs. The Requiements of existing standards should not be changed under this SAR.

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

This form is to be used to submit comments on the proposed *Provide Missing Measures and Compliance Elements in Existing Standards* Standard Authorization Request. Comments must be submitted by **June 8, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “V0 Compliance Elements: SAR Comments” in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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Organization:		
Telephone:		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
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<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	



## **Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

Posted for comment is the initial draft of the *Provide Missing Measures and Compliance Elements in Existing Standards* SAR that attempts to identify and prioritize the deficient or missing measures and compliance elements in the V0 standards. The translation to Version 0 Reliability Standards was limited to include only existing requirements, measures and compliance elements from the planning standards and operating policies. Because the development was limited to translation of existing elements, the V0 standards were adopted with several known deficiencies, specifically in the area of measures and compliance elements. The Compliance and Certification Managers Committee (CCMC) has reviewed the Version 0 standards in order to identify and prioritize the missing measures and compliance elements. Revisions to these standards are needed to enable inclusion of these standards in the Compliance Monitoring Program.

During the postings of Version 0 Standards, many stakeholders expressed concern with the missing compliance elements. The Version 0 Standard Drafting Team recognized the deficiencies, but was constrained by the instructions to develop the V0 Standards based solely on existing policies and standards. The V0 Drafting Team recommended that adding the missing compliance elements receive a high priority after approval of the Version 0 Standards. The accompanying SAR provides a listing and a prioritized schedule for developing the missing measures and compliance elements.

The CCMC would like to receive industry comments on this SAR and to obtain the input of the industry regarding prioritization of the elements of the SAR. Accordingly, we request your comments included on this form, emailed with the subject “V0 Compliance Elements: SAR Comments” by June 8, 2005.

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

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

Yes

No

**Please provide any additional comments:**

The industry adopted Version 0 standards with some known deficiencies, where the translation of certain previous NERC policies to new standards had to be placed on the back burner. The time has come to incorporate these missing elements into new standards.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

We agree with the scope of the proposed modifications, as long as any changes or additions to existing standards follows the process outlined in the NERC Reliability Standards Process Manual.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any explanation below:**

We believe that additional standards concerning a Balancing Authority's generation to load ratio and spinning reserve requirements are necessary to enhance overall system reliability.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any explanation or suggested modifications below:**

We propose the following schedule changes: defer work on CIP-001-0 from 2005 to 2008; advance work on COM-002-0 and TOP-004-0 from 2007 to 2006; defer work on PER-004-0 from 2006 to 2008; defer work on PRC-001-0 from 2007 to 2008.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 5: Do you have any additional comments regarding the SAR that you believe should be addressed?**

Yes

No

**If yes, please share those comments in the space provided below.**

In the Detailed Description section, first paragraph, second sentence, change the phrase -- reliability standards that are missing measures and compliance elements -- to -- reliability standards that have missing measures and/or compliance elements.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
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<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	



## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

### Background Information:

Posted for comment is the initial draft of the *Provide Missing Measures and Compliance Elements in Existing Standards* SAR that attempts to identify and prioritize the deficient or missing measures and compliance elements in the V0 standards. The translation to Version 0 Reliability Standards was limited to include only existing requirements, measures and compliance elements from the planning standards and operating policies. Because the development was limited to translation of existing elements, the V0 standards were adopted with several known deficiencies, specifically in the area of measures and compliance elements. The Compliance and Certification Managers Committee (CCMC) has reviewed the Version 0 standards in order to identify and prioritize the missing measures and compliance elements. Revisions to these standards are needed to enable inclusion of these standards in the Compliance Monitoring Program.

During the postings of Version 0 Standards, many stakeholders expressed concern with the missing compliance elements. The Version 0 Standard Drafting Team recognized the deficiencies, but was constrained by the instructions to develop the V0 Standards based solely on existing policies and standards. The V0 Drafting Team recommended that adding the missing compliance elements receive a high priority after approval of the Version 0 Standards. The accompanying SAR provides a listing and a prioritized schedule for developing the missing measures and compliance elements.

The CCMC would like to receive industry comments on this SAR and to obtain the input of the industry regarding prioritization of the elements of the SAR. Accordingly, we request your comments included on this form, emailed with the subject “V0 Compliance Elements: SAR Comments” by June 8, 2005.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any additional comments:**

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

The current scope as detailed in the SAR , "inclusion of missing information; however, the entire standard should be reviewed to ensure that existing requirements and measures meet the definitions identified in the NERC Reliability Standards Process Manual." is much too broad and its implementation would be very difficult, especially considering the time frames suggested.

The FRCC recommends that this SAR be broken out into multiple SARs. One SAR for each standard would be optimal and allow for a more manageable review by the industry along with a smoother drafting, commenting, and balloting process.

This approach will provide an additional level of flexibility to accommodate other standards development efforts that may be paralleling a particular standard. The individual SARs will also provide a focused view on each standard which will speed up the process of developing, drafting, reviewing and commenting on missing compliance elements to the Version "0" standards. We feel this simple approach would be more practical than what is being proposed in this "group" SAR and will result in implementation of "missing compliance elements" in a shorter time schedule than is being proposed. At a minimum the SAR should be broken up into smaller groups of standards related by subject matter.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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

Yes

No

**Please provide any explanation below:**

Not at this time.

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

---

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

Yes

No

**Please provide any explanation or suggested modifications below:**

The FRCC suggests that the missing compliance elements review and incorporation efforts be re-prioritized in accordance with the standards overall impacts on Interconnection Reliability. The standards listed in the SAR should be re-prioritized as listed below.

The prioritization in this order will allow a focus of resources on providing compliance elements on requirements with the greatest benefit for Interconnection Reliability. As stated earlier, we would also recommend that this SAR be broken out into multiple SARs. One SAR for each standard would be optimal and allow for a more manageable review by the industry along with a smoother drafting, commenting, and balloting process.

Standard IRO-005-0 - Reliability Coordination - Current Day Operations

Standard IRO-002-0 - Reliability Coordination - Facilities

Standard IRO-003-0 - Reliability Coordination - Wide Area View

Standard TOP-004-0 - Transmission Operations

Standard TOP-008-0 - Response to Transmission Limit Violations

Standard TOP-002-0 - Normal Operations Planning

Standard IRO-001-0 - Reliability Coordination - Responsibilities and Authorities

Standard TOP-001-0 - Reliability Responsibilities and Authorities

Standard TOP-006-0 - Monitoring System Conditions

Standard PER-004-0 - Reliability Coordination - Staffing

Standard VAR-001-0 - Voltage and Reactive Control

Standard EOP-004-0 - Disturbance Reporting

Standard EOP-003-0 - Load Shedding Plans

Standard EOP-006-0 - Reliability Coordination - System Restoration

Standard EOP-002-0 - Capacity and Energy Emergencies

Standard COM-001-0 - Telecommunications

Standard COM-002-0 - Communications and Coordination

Standard CIP-001-0 - Sabotage Reporting

Standard INT-001-0 - Interchange Transaction Tagging

Standard INT-002-0 - Interchange Transaction Tag Communication and Assessment

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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Standard INT-003-0 - Interchange Transaction Implementation

Standard PRC-001-0 - System Protection Coordination

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 5: Do you have any additional comments regarding the SAR that you believe should be addressed?**

Yes

No

**If yes, please share those comments in the space provided below.**

Some of these "missing elements" may be very minor drafting efforts since the process is to simply convert existing, "approved", requirements to measures, and then develop the accompanying compliance elements. Conversion to multiple SARs will allow these "minor" additions to go through the process without being delayed as a group by some of the more complex elements. This approach will provide drafting teams with clearly defined work scopes and will focus industry review efforts more efficiently by providing smaller postings for review and avoiding multiple revisions of very large documents.

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Joanne Borrell
Organization:	FirstEnergy Solutions Corp.
Telephone:	330-315-6857
Email:	jkborrell@fes.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input checked="" type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

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During the postings of Version 0 Standards, many stakeholders expressed concern with the missing compliance elements. The Version 0 Standard Drafting Team recognized the deficiencies, but was constrained by the instructions to develop the V0 Standards based solely on existing policies and standards. The V0 Drafting Team recommended that adding the missing compliance elements receive a high priority after approval of the Version 0 Standards. The accompanying SAR provides a listing and a prioritized schedule for developing the missing measures and compliance elements.

The CCMC would like to receive industry comments on this SAR and to obtain the input of the industry regarding prioritization of the elements of the SAR. Accordingly, we request your comments included on this form, emailed with the subject “V0 Compliance Elements: SAR Comments” by June 8, 2005.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any additional comments:**

During the Version '0' process no measure or compliance requirements were added to existing standards. Certain standards need to have measure and compliance elements made part of the standard. The existing standards need to be reviewed and amended as necessary to include measures and compliance requirements.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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

Yes

No

**Please provide any explanation below:**

Any Standard without a measure needs to be part of this SAR. If no measure can be defined then the Standard is not a true standard and should be eliminated.

FAC-003-0 Vegetation Management should be considered for inclusion in this SAR. The addition of compliance measures would aid in insuring a focus on reliability in this area.

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

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

Yes

No

**Please provide any explanation or suggested modifications below:**

TOP-001-0, Reliability Responsibilities and Authorities, is the foundation of reliability and needs to be completed in the first phase. No matter how well Operations Planning and Transmission Operations are defined and detailed, reliability is nothing without having the Transmission Operator recognize that he or she has the 'responsibility and clear decision-making authority to take what ever action is needed to ensure reliability'. CIP-001-0 Sabotage Reporting of suspected sabotage is much less a threat to reliability than a Transmission Operator without clear decision-making authority

CIP-001-0 Sabatoge reporting should exchange places with TOP-001-0 Reliability Responsibilities and Authorities. A clear understanding and measure of responsibility and authority provides a direct effect on and greater assurance of reliability than measuring whether sabatoge reporting is accurate and appropriate

## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

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Yes

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**If yes, please share those comments in the space provided below.**

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

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Roger Champagne	
Organization:	Hydro-Québec TransÉnergie	
Telephone:	514-289-2211, ext. 2766	
Email:	champagne.roger.2@hydro.qc.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
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<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	



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During the postings of Version 0 Standards, many stakeholders expressed concern with the missing compliance elements. The Version 0 Standard Drafting Team recognized the deficiencies, but was constrained by the instructions to develop the V0 Standards based solely on existing policies and standards. The V0 Drafting Team recommended that adding the missing compliance elements receive a high priority after approval of the Version 0 Standards. The accompanying SAR provides a listing and a prioritized schedule for developing the missing measures and compliance elements.

The CCMC would like to receive industry comments on this SAR and to obtain the input of the industry regarding prioritization of the elements of the SAR. Accordingly, we request your comments included on this form, emailed with the subject “V0 Compliance Elements: SAR Comments” by June 8, 2005.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any additional comments:**

Hydro-Québec TransÉnergie (HQTÉ) agree with prioritizing and identifying missing and deficient compliance elements and measures from the existing Version 0 standards. Other issues should be addressed in Version 1.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

HQTÉ agree with the scope of the SAR however the title is misleading. The SAR, as written, will allow the Drafting Teams to go beyond the addition of the missing compliance measures and elements and perhaps open a full review of the identified Version 0 Standards.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any explanation below:**

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any explanation or suggested modifications below:**

HQTÉ believe COM-002-0 Standard should be moved up in priority. This COM-standard outline requirements, needs and availability of adequate and reliable telecommunication facilities for exchange of interconnection and operating information. This is a critical standard requiring priority compliance measures and therefore should be moved up/added into the higher priority/stage 1 category.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 5: Do you have any additional comments regarding the SAR that you believe should be addressed?**

Yes

No

**If yes, please share those comments in the space provided below.**

The SAR, in its title and description, should clearly indicate the extent of the proposed revision.

HQTÉ also believe that although there is value in this SAR showing schedule and priority, there should be a separate SAR for each standard to outline what will be done and frame the Drafting Team's work appropriately and ensure coordination with Version 1.

In addition HQTÉ ask the Drafting Team to clarify why standards such as (EOP-002-0, IRO-001-0) with Measure and compliance elements were included in this effort while, at the same time, there seems to be an omission of some standards such as (EOP-005-0, BAL-003-0 to BAL-006-0) that are missing those same elements.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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<b>Individual Commenter Information</b>	
<b>(Complete this page for comments from one organization or individual.)</b>	
Name:	Michael C. Calimano
Organization:	NYISO
Telephone:	518-356-6205
Email:	mcalimano@nyiso.com
<b>NERC Region</b>	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
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## Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards

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### Background Information:

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During the postings of Version 0 Standards, many stakeholders expressed concern with the missing compliance elements. The Version 0 Standard Drafting Team recognized the deficiencies, but was constrained by the instructions to develop the V0 Standards based solely on existing policies and standards. The V0 Drafting Team recommended that adding the missing compliance elements receive a high priority after approval of the Version 0 Standards. The accompanying SAR provides a listing and a prioritized schedule for developing the missing measures and compliance elements.

The CCMC would like to receive industry comments on this SAR and to obtain the input of the industry regarding prioritization of the elements of the SAR. Accordingly, we request your comments included on this form, emailed with the subject “V0 Compliance Elements: SAR Comments” by June 8, 2005.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any additional comments:**

Prioritizing and identifying missing and deficient compliance elements and measures from the existing Version 0 standards, only. Other issues should be addressed in Version 1.

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

**Question 2: Do you agree with the scope of the proposed modifications?**

Yes

No

**Please provide any explanation below:**

We agree with the scope of the SAR. The SAR must not allow the Drafting Teams to go beyond the addition of the missing compliance measures and elements (i.e. opening a full review of the identified Version 0 Standards).

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

---

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

Yes

No

**Please provide any explanation below:**

**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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

Yes

No

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**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Ray Morella	
Organization:	FirstEnergy Corp	
Telephone:	330.384.5686	
Email:	morellar@firstenergycorp.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 - Transmission Owners	
<input checked="" type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils	
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**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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Yes

No

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**Comment Form – Provide Missing Measures and Compliance Elements in Existing Standards**

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FAC-003-0 Vegetation Management should be considered for inclusion in this SAR. The addition of compliance measures would aid in insuring a focus on reliability in this area.

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