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1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?

Commenter	Yes	No	Neutral	Comments
Ed Groce Avista #5	X			Reliability coordinators in the WECC have demonstrated the capability to mitigate reliability problems
Al DiCaprio MAAC #2	X			It is imperative that the entity that serves as an RA have all of the tools necessary to carry out wide-area reliability analysis, as well as have the authority to carry out emergency load shedding as a means of preventing interregional cascading or instability.
Kathleen Goodman ISO New England #2	X	X		While I agree there is a need to certify certain functions, such as Control Area functions, I do not agree that the existing entities that have been performing these functions for several years need to be re-certified under the new model unless the requirements have changed, which I don't think is the case.
<p>It is currently envisioned that all entities performing this function will be required to go through some type of certification process. It is possible that those entities that have recently gone through a complete certification process be afforded the opportunity to go through some sort of abbreviated process. This comment will be forwarded to the OCTF who is working on a transition plan.</p>				
Linda Campbell for FRCC OC #1, 3,4,5		X		<p>FRCC does not really know what the Reliability Function is. It is unclear who this applies to, whether it is to those performing the Reliability Coordinator function today, or to many of our existing control areas. However, the FRCC OC does believe that any entity that performs reliability functions, especially those that direct the actions of others, should be certified.</p> <p>The SAR is premature since the FMRTG just posted a report on 1/7/03 that may further define or clarify reliability functions. We believe this SAR, along with the other 3 certification SARs should be placed on hold until such time that the reliability functions and relationships are clearly defined and understood by the industry.</p>
<p>It is expected that the work being done on the Functional Model will further clarify the Reliability Authority function.</p> <p>The changes to the Functional Model are not expected to significantly change the required 'capabilities' contained within the draft SARs.</p> <p>Even though we may need to make some minor adjustments to the certification requirements as a result of the FMRTG, there seems to be industry consensus on the need to make a start in developing these certification standards.</p>				
Martin Boisvert, HQ, #1	X			It is not essential to certify the function as long as the individuals who are performing the RA, BA, IA responsibilities, i.e. those who have the authority to apply the criteria, are each NERC certified.

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Existing Control Area certification focuses on both 'readiness to perform reliably' and 'performing reliably' and the existing compliance program also assesses 'performing reliably'. The new functional certification focus solely on 'readiness to perform reliably' and leaves assessment of the 'performing reliably' portion to the compliance enforcement program. With the transition away from control areas, there is a need to put together a functional certification process that can be used by the industry in the near term. Even though we may need to make some adjustments to the certification requirements as we progress, there seems to be industry consensus on the need to make a start in developing these certification standards.			
John Stickley AECI #1	X		Certification of the Balancing Authority function is necessary from a reliability perspective. However, AECI believes that it makes little sense to go about certifying Balancing Authorities to perform functions for which there are currently no standards. It seems that we're getting the cart ahead of the horse.
Existing Control Area certification focuses on both 'readiness to perform reliably' and 'performing reliably' and the existing compliance program also assesses 'performing reliably'. The new functional certification focus solely on 'readiness to perform reliably' and leaves assessment of the 'performing reliably' portion to the compliance enforcement program. With the transition away from control areas, there is a need to put together a functional certification process that can be used by the industry in the near term. Even though we may need to make some adjustments to the certification requirements as we progress, there seems to be industry consensus on the need to make a start in developing these certification standards.			
Tony Jankowski We Energies # 3, 4, 5	X		Should also include clarification on how the area of responsibility of the RA is defined.
This SAR is addressing the certification of an entity to be a Reliability Authority, not defining how a RA acquires a physical territory. It has never been the intent to pre-define boundaries for the RA. Certification will require that there are agreements in place between the entities performing the functions and these arrangements will be the determining factors for defining the RA boundaries. The SAR posting requested industry input into the level of agreements that should be in place and with whom.			
Gordon Pietsch Great River Energy #1	X		While I believe there is a need to certify the Reliability Authority function, I do not believe that creating a Standard is necessary. NERC needs to have a process for certification that encompasses all functions. Creating a Certification Standard before having other Standards adopted by the industry might result in a continuous modification of a Certification Standard if this standard is to reference other Standards, which are being developed.
Existing Control Area certification focuses on both 'readiness to perform reliably' and 'performing reliably' and the existing compliance program also assesses 'performing reliably'. The new functional certification focus solely on 'readiness to perform reliably' and leaves assessment of the 'performing reliably' portion to the compliance enforcement program. With the transition away from control areas, there is a need to put together a functional certification process that can be used by the industry in the near term. Even though we may need to make some adjustments to the certification requirements as we progress, there seems to be industry consensus on the need to make a start in developing these certification standards.			
John Blazekovich Exelon	X		Exelon believes that some form of certification should be required for Reliability Authorities,

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#1, 3, 5, 6			Interchange Authorities, Balance Authorities and Transmission Operator functions. We do not consider the certification process of functional roles as solely a "core reliability" issue, as such we believe the development of the certification process and criteria should be submitted to the NERC/NAESB JIC process so that the JIC can determine the best entity to define certification criteria.
The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.			
Ken Githens Allegheny #5	X		But, the certification process should not be a standard. The certification process could be covered by a business procedure.
The OCTF included the certification process in the SAR because the industry requested (during industry workshops) that the certification process be addressed consistently across Regional Boundaries. The only way to ensure that a process be followed consistently is to include the process within the standard.			
The criteria contained within the SARs was drafted to support reliability of the interconnected North American grid, not to support business practices.			
The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.			
William Reinke SERC #2	X		RAs need to be certified because they perform reliability functions. The certification process is a business practice and therefore should not be the subject of a standard.
The criteria contained within the SARs was drafted to support reliability of the interconnected North American grid, not to support business practices.			
The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.			
Paul M. Cafone Public Service Electric and Gas Company	X		Answering this first question provides to me the opportunity to provide an "overall" comment on this, and the other related SARs that are identified within the NERC Functional Model. The following questions do not provide opportunity to discuss, debate, or provide commentary on the SAR itself. An example is the Reliability Authority Certification Process. In paragraph 5, it states that the Applicant must register in the NERC Master Registry, and Furthermore, Registration stays on hold until Certification is granted. What does this mean? What is the NERC Master Registry? and why is a Registration on Hold ?? What is a Reliability Authority to do? Are they then in Limbo until certified? Who is doing the work now? etc. In Paragraph 10 the Review Team composition can be awful funny if allowed. Why not have a representative from NERC Staff, a representative from another NERC Region, and a Regional Compliance Committee member compose the Review Team, it's allowed. The problem is quite logically these people may not at all be familiar with the amount of work, type of work, the actual work, etc. of the proposed Reliability Authority.

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			Item 12 of the Reliability Authority Certification Process is even more ill defined, e.g, visit the Applicant's Facility. What are the requirements for a Facility? It's Staffing? It's Capability? It's required telemetry?
<p>The OCTF is developing a registration process whereby entities register with NERC to identify the function(s) that entity wants to perform. Your comments regarding the registration process will be forwarded to the OCTF.</p> <p>Regarding Paragraph 10: The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p> <p>Regarding Paragraph 12: The details of the measures included in the standard will address these issues. These details will be developed by the Standards Drafting Team.</p>			
MIPS & LTIS	X		unanimous, and would like to have included clarification on how the area of a Reliability Authority would be defined
<p>This SAR is addressing the certification of an entity to be a Reliability Authority, not defining how a RA acquires a physical territory.</p>			
Art Giardino PSE&G #1		X	This SAR requires certification of Organizations who will perform or implement actions necessary for the reliable planning, scheduling, operation and maintenance of the interconnected bulk power system. The Reliability Standards that will govern these activities have not been developed. It is therefore premature to certify a performing organization when the rules of performance do not exist. For this reason alone, this SAR should be cancelled.
<p>Existing Control Area certification focuses on both 'readiness to perform reliably' and 'performing reliably' and the existing compliance program also assesses 'performing reliably'. The new functional certification focuses solely on 'readiness to perform reliably' and leaves assessment of the 'performing reliably' portion to the compliance enforcement program. With the transition away from control areas, there is a need to put together a functional certification process that can be used by the industry in the near term. Even though we may need to make some adjustments to the certification requirements as we progress, there seems to be industry consensus on the need to make a start in developing these certification standards.</p>			
Paul Elwing Lakeland Elec #3		X	This SAR should be put on hold until the Functional Model Task Group completes work on building/defining all aspects of the NERC Functional Model.
<p>The changes to the Functional Model are not expected to significantly change the required 'capabilities' contained within the draft SARs. Even though we may need to make some minor adjustments to the certification requirements as a result of the FMRTG, there seems to be industry consensus on the need to make a start in developing these certification standards.</p>			
David Little Nova Scotia #1,3,5	X		
Stuart Goza TVA #1	X		
Guy Zito NPCC #2	X		

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Barry Gee National Grid #1	X		
Karl Kohlrus CWLP #5	X		
William Smith Allegheny #1	X		
Roman Carter for Tony Reed Southern Co en and En Mkt #1, 3, 5, 6	X		
Tom Pruitt Duke Energy #1	X		
Terri Kuehneman SRP #1,3	X		
Lee Gladish CWLP #4	X		
Gerald Rheault Manitoba Hydro #1, 3, 5	X		
Michael Desselle AEP #1, 3, 5, 6	X		
Peter Burke [for Alan Staats and Bobbi Welch]ATC #1	X		
A. Ralf Rufrano NYPA #1	X		
Ray Morella First Energy #1	X		
John Muir Con Ed #1	X		
Andrew Wilcox NB Power #1	X		
Alan Boesch NBPP #1	X		
Alan Johnson Mirant #6	X		
Roger Green SOCO Gen #4	X		
George Bartlett Entergy Svcs #1, 3, 5	X		
Sam Jones ERCOT #2	X		
Jim Cyrulewski, ITC #1	X		
Ed Riley CAISO #2	X		
William Pope Gulf Power #3		X	

2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?

Summary Consideration: The consensus of the comments is that all affected Regions should be involved, but that one of those Regions should take the lead in coordinating the effort and the certification decision should be a collective effort made equally by all team members. We will ask the industry if this is accurate. The SAR DT felt that there was much confusion with the presentation of some questions in the first posting. Changes have been made in the SAR and questions posed in the comment form to gain industry input.

Commenter	One	All	Comments
Roman Carter for Tony Reed Southern Co en and En Mkt #1, 3, 5, 6	X		The Region in which the Reliability Authority primarily resides and does business should have the lead role in the certification process. It would make the formal recommendation for certification or not certification with applicable justifications. All affected Regions should be involved and be allowed to provide input. Further, it is recommended that participation from the Generator sector be included in this process.
We will ask the industry if they support your suggestion to have the Region where the RA primarily resides and does business have the lead role. Industry input will be sought with regard to the issue the Generator sector involvement.			
Roger Green SOCO Gen #4	X		The Region in which the Reliability Authority primarily resides and does business should have the lead role in the certification process and make the formal recommendation for certification or no certification with applicable justifications. All affected Regions should be involved and be allowed to provide input.
We will ask the industry if they support your suggestion to have the Region where the RA primarily resides and does business have the lead role.			
Karl Kohlrus CWLP #5		X	NERC should do the certification. Having one region take the lead for example in the case of MISO, which spans four NERC regions, does not seem appropriate.
The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.			
Tom Pruitt (Duke Energy Grid) #1		X	We think the certification should be NERC, not a Region or Regions. Else, how will certification from multiple regional councils be handled should those councils have conflicting objectives for the RA and consequently conflicting recommendations for confirmation.
The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs. The certification SARs do not currently contain any Regional Differences but these may exist in the future. We will ask the industry for confirmation that if a RA is certified and will operate in multiple Regions, the most stringent Region's Regional Difference within the Certification Standard will be applied.			
Sam Jones ERCOT #2		X	Certification should be by NERC with Region involvement as necessary

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<p>The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p>			
<p>Gerald Rheault Manitoba Hydro !1, 3, 5</p>		X	<p>Manitoba Hydro believes that the making of the certification decision should be driven by NERC with involvement of the region/regions where the functional Authority will operate. Further comments related to this issue are provided in question 3 and 4 comments.</p>
<p>The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p>			
<p>Peter Burke [submitting responses for ATC's Alan Staats and Bobbi Welch]ATC #1</p>		X	<p>If multiple Regions are involved, we believe that at least one representative from each Region should be involved in the certification process, perhaps in the make-up of a single team. Our concern with having multiple Regions involved in separate evaluation processes is that it introduces additional layers of approvals and has the potential to introduce conflicting certification criteria if there are differing requirements between Regions. In addition, the time commitment involved in receiving certification could increase dramatically. Alternatively, having one Region as the lead Region responsible for certifying a large Reliability Authority with a major presence in several Regions, such as the MISO, undercuts the ability of the other involved, non-lead Regions to provide adequate input into the process. Therefore, we feel that each Region should be represented equally/adequately. Finally, it would help solve the bias problem if NERC were the lead body in the certification process when multiple Regions are involved.</p>
<p>The intent of this SAR is to standardize the certification criteria/process between regions. The certification SARs do not currently contain any Regional Differences but these may exist in the future. We will ask the industry for confirmation that if an RA is certified and will operate in multiple Regions, the most stringent Region's Regional Difference within the Certification Standard will be applied.</p> <p>As envisioned, an RA that operates in multiple regions would only be required to obtain a single RA certification. All involved regions would have an opportunity to be involved in the certification process.</p> <p>The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p>			
<p>Paul M. Cafone Public Service Electric and Gas Company</p>		X	<p>One Region might consider one person on duty acceptable. One Region might think one telephone line is acceptable. What are the basic minimum staffing and Facilities for a Reliability Authority Control Center Facility? Can I do it out of my house?</p>
<p>The details of the measures included in the standard will address these issues.</p>			
<p>MIPS & LTIS Tony Jankowski We Energies # 3, 4,</p>			<p>Are you asking whether RA areas should be constrained by Regional boundaries? If more than one Region were to be involved in the RA certification, what process would</p>

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5			<p>be used if some Regions approved the certification and some declined? Concern: If only one region were involved the chance of overlooking or not identifying region specific issues may be a problem.</p>
<p>The intent of this SAR is to standardize the certification criteria/process between regions. The certification SARs do not currently contain any Regional Differences but these may exist in the future. We will ask the industry for confirmation that if an RA is certified and will operate in multiple Regions, the most stringent Region's Regional Difference within the Certification Standard will be applied.</p> <p>As envisioned, an RA that operates in multiple regions would only be required to obtain a single RA certification. All involved regions would have an opportunity to be involved in the certification process.</p> <p>The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p>			
John Blazekovich Exelon #1, 3, 5, 6			<p>Regional involvement in certification should not be defined until it is determined who is the appropriate group is to perform the certification function. Certification criteria can be developed by a central entity, more discussion may be required in order to determine the appropriate certification agency.</p>
<p>The criteria contained within the SARs was drafted to support reliability of the interconnected North American grid, not to support business practices. The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.</p>			
Ed Riley CISO			<p>NERC should be the certifying body when regional boundaries are exceeded by any "authority".</p>
<p>The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p>			
Mike Miller Southern Company			<p>Since a RA reviews seams issues among control areas and several regions could be subjected to decisions of a RA, the region or regions should be actively involved.</p>
Ken Githens Allegheny #5	X		<p>Other regions could provide resources needed to the review team to conduct the certification.</p>
Ray Morella First Energy #1		X	<p>All appropriate regions should be equal participants. This will insure consistency and awareness in potential regional differences</p>
<p>As envisioned, an RA that operates in multiple regions would only be required to obtain a single RA certification. All involved regions would have an opportunity to be involved in the certification process.</p>			
Alan Johnson Mirant #6		X	<p>One region should be allowed to take the lead. However, the regions should work together to create the "questionnaires and related documents" that will be used to assess the applicant. Additionally, all regions should be represented on the Review Team. Finally, all regions must concur with the recommendation of the Review</p>

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			Team.
<p>The intent of the certification of entities performing functions across Regional boundaries was to provide a simplified process. This is the reason for seeking industry input into having a lead Region rather than exposing an entity to multiple certifications for performing the same functions across multiple Regions. Having a lead Region coordinate the process with all other affected Regions represented on the team appears provide a simplified process.</p>			
Lee Gladish CWLP #4		X	All regions should work in one unison effort to avoid duplication of effort
<p>The intent of the certification of entities performing functions across Regional boundaries was to provide a simplified process. This is the reason for seeking industry input into having a lead Region rather than exposing an entity to multiple certifications for performing the same functions across multiple Regions. Having a lead Region coordinate the process with all other affected Regions represented on the team appears provide a simplified process.</p>			
Linda Campbell for FRCC OC #1, 3,4,5		X	It is important that all regions participate in the certification process to cover all concerns, especially any regional differences.
<p>The intent of the certification of entities performing functions across Regional boundaries was to provide a simplified process. This is the reason for seeking industry input into having a lead Region rather than exposing an entity to multiple certifications for performing the same functions across multiple Regions. Having a lead Region coordinate the process with all other affected Regions represented on the team appears provide a simplified process. The certification SARs do not currently contain any Regional Differences but these may exist in the future. We will ask the industry for confirmation that if a RA is certified and will operate in multiple Regions, the most stringent Region's Regional Difference within the Certification Standard will be applied.</p>			
John Stickley AECI #1	X	X	AECI believes that where multiple regions are involved, it is important for one region to lead and direct the process. However, all regions in which the Balancing (<i>Reliability</i>) Authority will perform its functions should be actively involved in the certification process.
<p>Clarification has been made in the SAR and additional industry input is being requested to gain consensus.</p>			
William Reinke SERC #2	X	X	Although one region should take the lead for certification of the RA, it should not have the authority to make the certification decision unless that authority has been delegated to it by the other regions. Otherwise all regions should be parties to the certification decision.
<p>The intent of the certification of entities performing functions across Regional boundaries was to provide a simplified process. This is the reason for seeking industry input into having a lead Region rather than exposing an entity to multiple certifications for performing the same functions across multiple Regions. Having a lead Region coordinate the process with all other affected Regions represented on the team appears provide a simplified process.</p>			
George Bartlett Entergy Svcs #1, 3, 5	X		
A. Ralf Rufrano NYPA #1	X		

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Guy Zito NPCC #2	X		
Ed Groce Avista #5	X		
David Little Nova Scotia #1,3,5	X		
John Muir Con Ed #1	X		
Barry Gee National Grid #1	X		
William Smith Allegheny #1		X	
William Pope Gulf Power #3		X	
Paul Elwing Lakeland Elec #3		X	
Martin Boisvert, HQ, #1		X	
Stuart Goza TVA #1		X	
Terri M. Kuehneman SRP #1,3		X	
Kathleen Goodman ISO New England #2		X	
Gordon Pietsch Great River Energy #1		X	
Alan Boesch NBPP #1		X	
Jim Cyrulewski, ITC #1		X	
Andrew Wilcox NB Power #1			Neutral.

3. Who should certify the Reliability Authority function?

Summary Consideration: The comments submitted indicate some misunderstandings about the certification process. As currently envisioned, the certification process will be supported by a team that includes several voting members, and all team members will have an equal vote in determining whether or not to grant certification. The consensus of the industry's comments indicated that all affected Regions should be involved, but that one of those Regions should take the lead in coordinating the effort. The SAR DT has modified the SAR based on the information received and is seeking additional industry input for clarification.

Commenter	Region	NERC	RTO	Ind Team	Comments
Ed Riley CAISO #2	X	X			NERC should be the certifying body when regional boundaries are exceeded by any "authority".
The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.					
Al DiCaprio MAAC #2	X		X		Whichever organization is responsible for maintaining reliability, that organization should be responsible for certifying those entities that will be operating under their respective requirements. Nerc should provide a default certification process that can be used if the Region so desires (like the control area certification used today). In this way there is less of a chance that Nerc could 'certify' an entity but that entity would not have the tools to operate within the given region.
The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.					
Linda Campbell for FRCC OC #1, 3,4,5	X				It should be up to the Region(s) to accomplish the certification process. The Region(s) can choose to use an independent team or choose another method as long as it is fair and balanced. It should NOT be determined by NERC.
The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.					
Alan Boesch NBPP #1		X		X	NERC should form an independent team to certify the RA
The current procedure for certifying the RA allows for the Region to engage a completely independent team as identified in step 10 of the procedure.					
Ken Githens Allegheny #5				X	The independent team should be composed of representatives from NERC, NAESB, and possibly RTO/ISO's. Certifying entities need to certify not only reliability standards but also the associated market/commercial standards. All

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					certifications would be completed at the same time.
The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.					
Alan Johnson Mirant #6		X			NERC should provide the final stamp of approval, but the region or regions should perform the review and provide a certification recommendation.
The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.					
Lee Gladish CWLP #4		X			NERC issue certifications on the recommendation of the Regions.
The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.					
Gerald Rheault Manitoba Hydro !1, 3, 5		X			Manitoba Hydro believes that the region could be involved in the certification process; but the final responsibility for deciding whether an entity qualifies to be certified should rest with NERC. It will be NERC's responsibility to ensure that the Certification Criteria is applied uniformly in all regions.
The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.					
Sam Jones ERCOT #2		X		X	Certification issued by NERC if recommended by an Independent Team assigned by the NERC process
The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.					
Paul M. Cafone Public Service Electric and Gas Company			X		The RTO which is beholding to the FERC, is the only appropriate certification authority. They are directly involved on a minute to minute basis with the activities of a Reliability Authority. Neither NERC, nor a Region has 24 by 7 personnel on duty.
The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.					
Mike Miller Southern Company					Regional knowledge will ensure RA meets requirements. It could be possible to utilize an independent team made up of regional, NERC and RTO participates.
The current procedure for certifying the RA allows for the Region to engage a completely independent team as identified in step 10 of the procedure. The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.					
Tom Pruitt (Duke		X			This function is part of the NERC functional model, so certification should be at

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Energy Grid) #1					the same level. The certification process, however, does need to recognize regional differences. Also see comments to question 2 above.
<p>The intent of this SAR is to standardize the certification criteria/process between regions. The certification SARs do not currently contain any Regional Differences but these may exist in the future. We will ask the industry for confirmation that if an RA is certified and will operate in multiple Regions, the most stringent Region's Regional Difference within the Certification Standard will be applied.</p>					
Tony Jankowski We Energies # 3, 4, 5 MIPS & LTIS		X X			<p>NERC should be the organization that certifies RA's. This removes a problem of conflicting regional requirements. We have identified two scenarios:</p> <p>1) NERC may elect to delegate that responsibility to a Regional Council in those cases where the area of the RA is contained entirely in one Region, and</p> <p>2) In cases where the RA crosses regional boundaries, NERC could establish a balanced, cross-regional panel that would conduct a single certification process.</p> <p>Additionally, we believe that there should be a separate SAR/Standard that would establish a process for conducting all certification activities.</p>
<p>The intent of this SAR is to standardize the certification criteria/process between regions. The certification SARs do not currently contain any Regional Differences but these may exist in the future. We will ask the industry for confirmation that if an RA is certified and will operate in multiple Regions, the most stringent Region's Regional Difference within the Certification Standard will be applied.</p> <p>The OCTF included the certification process in the SAR because the industry requested (during industry workshops) that the certification process be addressed consistently across Regional Boundaries. The only way to ensure that a process be followed consistently is to include the process within the standard. We will ask the industry to confirm that the process should be applied consistently across regional boundaries by being included in the SAR and associated Standard.</p>					
Michael Desselle AEP #1, 3, 5, 6				X	<p>Recognizing that the Regions may not be aware of differences between themselves and that the criteria are contained in the SAR, NERC's Technical Committee should develop the criteria through its SAR process in conjunction with a team of stakeholders, the FERC and NAESB for the Regions to follow in certifying the Balancing Authority function to:1) Eliminate the regional differences2) Better adherence to the NERC standards.</p>
<p>The intent of this SAR is to standardize the certification criteria/process between regions. The certification SARs do not currently contain any Regional Differences but these may exist in the future. We will ask the industry for confirmation that if an RA is certified and will operate in multiple Regions, the most stringent Region's Regional Difference within the Certification Standard will be applied.</p> <p>The criteria contained within the SARs was drafted to support reliability of the interconnected North American grid, not to support business practices. The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.</p>					
John Blazekovich Exelon #1, 3, 5, 6					<p>After the certification process and criteria is determined by the appropriate NERC/NAESB process and directed by the NERC NAESB JIC, the question of "who should certify" may become self-evident or may require further industry</p>

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					discussion on the appropriate certification body. We would encourage discussion among the industry (stakeholders) to determine the appropriate certifying agency(s).
The criteria contained within the SARs was drafted to support reliability of the interconnected North American grid, not to support business practices. The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.					
John Muir Con Ed #1	X				
Andrew Wilcox NB Power #1	X				
William Smith Allegheny #1	X				
David Little Nova Scotia #1,3,5	X				
Paul Elwing Lakeland Elec #3	X				
Ed Groce Avista #5	X				
Guy Zito NPCC #2	X				
A. Ralf Rufrano NYPA #1	X				
John Stickley AECL #1	X				
Martin Boisvert, HQ, #1	X				
Terri M. Kuehneman SRP #1,3	X				
George Bartlett Entergy Svcs #1, 3, 5	X				
William Reinke SERC #2	X				
Barry Gee National Grid #1	X				
Karl Kohlrus CWLP #5		X			

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Ray Morella First Energy #1		X			
Peter Burke [for Alan Staats and Bobbi Welch] ATC #1		X			
Stuart Goza TVA #1		X			
Gordon Pietsch Great River Energy #1		X			
Jim Cyrulewski, ITC #1		X			
Art Giardino PSE&G #1			X		
Kathleen Goodman ISO New England #2				X	

4. Do we have the appropriate review team members identified?

Summary Consideration: The comments do not indicate there is industry consensus on this issue. The SAR DT has made some modification to the SAR based on comments received and will seek additional industry input in an attempt to gain consensus. The modification to the SAR include a clarification of how the team would be assembled in multi-regional certification and also the inclusion of additional team members that have been suggested through the comment process. The criteria used for certifying the RA would involve a single set of criteria. The only condition under which there would be a variation to the RA certificate from Region to Region would be if there were any approved Regional Differences included in the RA Certification Standard.

Commenter	Yes	No	Comments
Barry Gee National Grid #1 David Little Nova Scotia #1,3,5 A. Ralf Rufrano NYPA #1 John Muir Con Ed #1 Guy Zito NPCC #2	X X X X		If this question refers to categories yes-the categories are appropriate. National Grid (NPCC) also recommends that the individuals selected have broad, system wide operating system experience. NERC staff, while listed as a category, should not be a voting member. National Grid feels there should be a minimum of one representative from each of the four categories, IA,RA,BA, and TO.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Alan Johnson Mirant #6	X		Given that the RA will collect and analyze generator outage data and specify requirements for IOS, it seems to me that the either the Generator or PSE functions should be represented on the review team. However, since these functions are represented in the Ballot Body, which will approve the certification criteria, I don't feel strongly about it.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Lee Gladish CWLP #4	X		A mandatory "outsider" should be on the review team, such as a rep from NERC staff, or another Region.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Michael Desselle AEP #1,	X		While the appropriate review team members have been identified, we feel that there should be a minimum of 5 members on the team. Also, the NERC Technical Committee

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3, 5, 6			should put together such review teams and not the region.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Peter Burke [submitting responses for ATC's Alan Staats and Bobbi Welch] ATC #1	X		Our concern here is that, if you are allowing the Review Team to be as small as three individuals, then certain of the categories should take precedence over other(s) and be required in the formation of a Review Team. For example, we would like to see that a certified Reliability Authority be involved in the certification of another Reliability Authority. It does not make sense that a three person team made up of a Balancing Authority, an Interchange Authority, and a Transmission Operator, would have the necessary expertise to certify a Reliability Authority.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Gordon Pietsch Great River Energy #1	X		In order to insure true independence, the members of the review team should be experts in the functional area and not necessarily employed by a particular entity performing the function. This is especially true where there are marketing implications.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Sam Jones ERCOT #2	X		Independent team preferred
The current procedure for certifying the RA allows for the Region to engage a completely independent team as identified in step 10 of the procedure. The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.			
William Smith Allegheny #1	X		Minimum credentials should be established for the selection of Review Team Members.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Kathleen Goodman ISO New England #2	X	X	Should exercise caution when selecting review team members. Having members who perform merchant functions on the team, which is the current practice, could be a violation of the Applicant's code of conduct.
In accordance with step 9 in the procedure, both the Region and the applicant must approve the review team. Issues such as these identified should be handled at this point of the process.			
Paul Elwing Lakeland Elec		X	Representative from Regional Reliability Council should be included

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#3			
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Linda Campbell for FRCC OC #1, 3,4,5		X	A representative from Regional Staff should also be included.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Alan Boesch NBPP #1		X	I believe an knowledgeable independent team should be used
The current procedure for certifying the RA allows for the Region to engage a completely independent team as identified in step 10 of the procedure. The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.			
Ken Githens Allegheny #5		X	See comment for question 3. <i>{RA_3. The independent team should be composed of representatives from NERC, NAESB, and possibly RTO/ISO's. Certifying entities need to certify not only reliability standards but also the associated market/commercial standards. All certifications would be completed at the same time.}</i>
The current procedure for certifying the RA allows for the Region to engage a completely independent team as identified in step 10 of the procedure. The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.			
The current SARs only address certification of an entity performing a function from a reliability perspective. They are not intended to address market/commercial standards. It is also envisioned that when an entity is performing multiple functions, it would be more efficient for all of the certifications for the functions being performed (reliability), be done at the same time.			
Art Giardino PSE&G #1		X	This list is a mix of functions and performing entities, and is as such invalid.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Gerald Rheault Manitoba Hydro !1, 3, 5		X	Manitoba Hydro believes that this issue does not belong in the Standard as discussed in detail in the question 6 comment. However, since there will be a requirement to address the issue of Review Team membership in an administrative document relative to this Standard, following is Manitoba Hydro's comments relative to the composition of the Review Team. The

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			<p>review team should be composed of three members. These members should be selected from the following categories:</p> <ol style="list-style-type: none"> 1. NERC staff. 2. Region staff. 3. an independent organization who has expertise in conducting this type of review <p>The exact composition of representation, from the three classification of entities listed above, is not critical. The Review Team should be composed of individuals who possess expertise in doing these kinds of reviews.</p> <p>The review team should not include representation from certified authorities or RTO staff because of possible conflict of interest issues.</p>
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
Tony Jankowski We Energies # 3, 4, 5 MIPS & LTIS		X X	<p>This question appears to assume the answer to the previous question has already been determined that the Region conducts the certification. Please see answer above in #3.</p> <p>Any list should also require that those members of the certification team be knowledgeable in the relevant functions that would be performed by the RA requesting certification, and at least one member of the team should be NERC certified as a RA. The certification process should clearly define what constitutes consensus. The Review Team must be composed of representatives of members from each applicable type of authority and function that is immediately and directly affected by the activities and functions of the organization being certified.</p>
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
George Bartlett Entergy Svcs #1, 3, 5		X	<p>Market participants should not be Review Team members. Therefore, Review Teams should have no members that are Interchange Authorities. Any other Team members representing Regions, or Operating Committee, etc, also should not be market participants.</p>
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form. In accordance with step 9 in the procedure, both the Region and the applicant must approve the review team. Issues such as these identified should be handled at this point of the process.</p>			

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Roger Green SOCO Gen #4		X	The Review Team should have representation from the Generation Sector. Actions and decisions made by the Reliability Authority could have direct and indirect impacts on the generating plants. Each Region should be encouraged to form a Generation Subcommittee or Working Group that would be involved in the certification process. And the Generator is a fundamental and important component of the NERC Functional Model.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Roman Carter for Tony Reed Southern Co en and En Mkt #1, 3, 5, 6		X	The Review Team above is heavily weighted with Reliability function entities. The review team should have representation from the Generation sector in each of the affected Regions. Actions and decisions made by the Reliability Authority could have direct and indirect impacts on the Generators.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Terri M. Kuehneman SRP #1,3		X	Recommend striking the last paragraph in No. 10 of SAR, "In the alternative, the Region may elect, with applicant agreement, to engage a completely independent review team.". Why would an exception be necessary or allowed with such a broad list of choices from which to assemble a qualified review team of three. If paragraph is left in, recommend that a clearer definition of "independent review team" be made at the end of No. 10. Need criteria to assure minimum team member qualifications.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form. The original intent of the independent review team option was to afford Regions the capability to seek assistance from an outside source to complete the high volume of certifications, in a reasonable time period.			
Ed Riley CISO		X	The reviewing parties must have some expertise in the functions, roles, and responsibilities of the "authority" to be reviewed; it doesn't really matter what category they come from. There should always be a fourth individual from the NERC staff on each review team to ensure consistency and objectivity. The CISO believes it is inappropriate for a region to engage an independent review team - NERC should be the certifying body if the region doesn't want to do it.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			

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Paul M. Cafone PS&G #1		X	Those people who are immediately and directly affected by the activities of the function of the Reliability Authority should provide the personnel for the Review Team. You need the people closest to the Work.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Mike Miller Southern Co			1. The review team should have one NERC certified individual. 2. Transmission Owners should be represented since significant assets are owned but being managed by RA. This will provide access to owners of assets putting control into RA with ownership input.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
John Blazekovich Exelon #1, 3, 5, 6		X	Cannot be determined at this point. In order to determine the proper certification agency, industry stakeholders should consider independence, credibility, and efficiency in choosing the appropriate certification body.
The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.			
Karl Kohlrus CWLP #5	X		
Ray Morella First Energy #1	X		
Andrew Wilcox NB Power #1	X		
Ed Groce Avista #5	X		
Martin Boisvert, HQ, #1	X		
Stuart Goza TVA #1	X		
Al DiCaprio MAAC #2	X		
William Reinke SERC #2	X		
Jim Cyrulewski, International Trans Company #1	X		
John Stickley AECI #1	X		
Tom Pruitt (Duke Energy		X	

Grid) #1			
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5. Should a NERC staff person be assigned to each review team?

Summary Consideration: There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.

Commenter	Yes	No	Comments
Roman Carter for Tony Reed Southern Co en and En Mkt #1, 3, 5, 6	X		While regions are taking the lead role with the certification process, having a NERC staff person involved to help facilitate the process should help complete the process more quickly and avoid certain pitfalls.
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
MIPS & LTIS	X		The staff person should be from the NERC Compliance department and be familiar with the certification process and the requirements of the RA function. The purpose would be to ensure that a consistent methodology is applied to the certification process, and the NERC staff person would not directly participate or have a vote in the certification process.
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Alan Boesch NBPP #1	X		NERC should coordinate the process
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Alan Johnson Mirant #6	X		A staff person should be assigned to assure consistent application of criteria across this key function.
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Kathleen Goodman ISO New England #2	X		Only if NERC staff members are available to participate, but the reviews should not be dependant on this.
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Lee Gladish CWLP #4	X	X	See comments to #4. Just so an outsider is involved. <i>{RA_4. A mandatory "outsider" should be on the review team, such as a rep from NERC staff, or another Region.</i>

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The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Michael Desselle AEP #1, 3, 5, 6	X		NERC Staff assigned to each review team should be non-voting members.
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Tony Jankowski We Energies # 3, 4, 5	X		The staff person should be from the NERC Compliance department and be familiar with the certification process and the requirements of the RA function. It would help ensure that a consistent methodology is applied to the certification process.
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Peter Burke [submitting responses for ATC's Alan Staats and Bobbi Welch] ATC #1	X		To the extent that multiple Regions are involved, a NERC staff person should be involved to ensure consistency.
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Al DiCaprio MAAC #2	X		There is a need that nerc staff provide a high level coordination function and review that cannot be carried out by any other group. An informed independent organization is needed and nerc staff fills that role.
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Roger Green SOCO Gen #4	X		Having a NERC staff person involved to help facilitate the process should help complete the process more quickly and avoid certain pitfalls.
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Ed Riley CISO	X		The reviewing parties must have some expertise in the functions, roles, and responsibilities of the "authority" to be reviewed; it doesn't really matter what category they come from. There should always be a fourth individual from the NERC staff on each review team to ensure consistency and objectivity. The CISO believes it is inappropriate for a region to engage an independent review team - NERC should be the certifying body if the region doesn't want to do it.
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			

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John Stickley AECI #1		X	AECI does not believe that a NERC staff person must be assigned to each certification review team, as long as the review teams perform their functions in a uniform manner. All Balancing Authorities need to be certified through the same process, with variances only for regional differences.
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Andrew Wilcox NB Power #1		X	Possibly when the Reliability Authority spans more than one Region.
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
William Smith Allegheny #1		X	NERC Staff should review the certification decision for consistency.
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
David Little Nova Scotia #1,3,5		X	Possibly when the RA spans more than one Region, and as a non-voting facilitator.
Ralf Rufrano NYPA #1		X	
John Muir Con Ed #1		X	
Guy Zito NPCC #2		X	
Barry Gee National Grid #1		X	
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
George Bartlett Entergy Svcs #1, 3, 5		X	No, not necessarily.
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
John Blazekovich Exelon #1, 3, 5, 6		X	Cannot be determined at this point.
William Reinke SERC #2		X	It is not necessary or appropriate to designate NERC staff to be assigned to each review team. Further, NERC staff may not have the necessary expertise to populate all of the review teams.

The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Paul M. Cafone PSE&G #1		X	No, this would only result in increased costs to all participants
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Paul Elwing Lakeland Elec #3			Only as an ad-hoc member, no voting authority
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Linda Campbell for FRCC OC #1, 3,4,5			So that consistency between regions is considered, it may be appropriate to include a NERC staff (as a non-voting member) on the review team if desired by the Region(s); however the Region(s) should lead the review and not NERC.I
The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Gerald Rheault Manitoba Hydro #1, 3, 5	X		<p>Refer to question 4 and question 6 comments.</p> <p><i>{RA_4. Manitoba Hydro believes that this issue does not belong in the Standard as discussed in detail in the question 6 comment.</i></p> <p><i>However, since there will be a requirement to address the issue of Review Team membership in an administrative document relative to this Standard, following is Manitoba Hydro's comments relative to the composition of the Review Team. The review team should be composed of three members. These members should be selected from the following categories:</i></p> <ol style="list-style-type: none"> <i>1. NERC staff.</i> <i>2. Region staff.</i> <i>3. an independent organization who has expertise in conducting this type of review</i> <p><i>The exact composition of representation, from the three classification of entities listed above, is not critical. The Review Team should be composed of individuals who possess expertise in doing these kinds of reviews.</i></p> <p><i>The review team should not include representation from certified authorities or RTO staff because of possible conflict of interest issues.</i></p> <p><i>{RA_6. Manitoba Hydro believes that the entire section entitled "Detailed Description of New Standard or Revision to Existing Standard" should be removed from the SAR. The SAR documentation should only start at the section entitled "Reliability Authority</i></p>

			<p><i>Certification Criteria". The Standard which will be produced from this SAR should only deal with "Criteria" and not "Process".</i></p> <p><i>The documentation contained in the section entitled "Detailed Description of New Standard or Revision to Existing Standard" is very relevant in the overall process of certification and should be included in the administrative documentation related to this Standard but does not belong in the Standard itself.}</i></p>
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p> <p>The OCTF included the certification process in the SAR because the industry requested (during industry workshops) that the certification process be addressed consistently across Regional Boundaries. The only way to ensure that a process be followed consistently is to include the process within the standard. We will ask the industry to confirm that the process should be applied consistently across regional boundaries by being included in the SAR and associated Standard.</p>			
Art Giardino PSE&G #1		X	RA Organizational Certification is not a core reliability function and is out of NERC scope.
<p>The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.</p>			
Karl Kohlrus CWLP #5	X		
Ray Morella First Energy #1	X		
Ed Groce Avista #5	X		
Gordon Pietsch Great River Energy #1	X		
Tom Pruitt (Duke Energy Grid) #1	X		
Terri M. Kuehneman SRP #1,3	X		
Sam Jones ERCOT #2		X	
William Pope Gulf Power #3		X	
Ken Githens Allegheny #5		X	

6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.

Commenter	Yes	No	Comments
Paul Elwing Lakeland Elec #3	X		Certification Process should be separate and stand-alone, not included in the SAR
<p>During workshops held by the OCTF, the industry participants indicated a strong desire to have the process for certification applied evenly across regional boundaries. The only way to assure that a process is followed consistently is to embed the process in a standard. If there were just one standard for the process, there is less flexibility in defining the specific certification steps.</p> <p>We will ask the industry to provide us feedback on whether the process should be in a stand-alone standard, or embedded within each of the certification standards.</p>			
Alan Boesch NBPP #1	X		The criteria should be based standards that are developed. This SAR appears to be very detailed.
<p>This SAR includes some details that aren't in other SARs – this is because of some specific requests made by industry participants during Workshops. The standard drafting team will add even more specific requirements, measures and descriptions of expected performance/outcomes.</p>			
Linda Campbell for FRCC OC #1, 3,4,5	X		The certification process itself should NOT be included in this SAR. It is a process that is a series of steps to be followed and is not material to reliability itself. The certification process steps should be considered a supporting document as anticipated in the Reliability Standards Process Manual. Only the criteria for the BA should be considered a reliability standard and be included in the SAR. NERC should develop an industry review process for items such as supporting documents, etc.
<p>The OCTF that drafted the SAR asked the advice of NERC's legal counsel regarding whether to include the certification process within the Certification Standards. The response was that if a process/procedure must be followed by all entities in the same way, then the process/procedure must be included within the standard. The 'process' does not need to be included in the SAR, but does need to be included in the associated standard. The OCTF felt that without presenting the process, the industry would not have the information needed to understand how the process will be administered. During the workshops held by the OCTF, there were very clear directions to develop a process that was applied evenly from Region to Region.</p> <p>Regarding the request to develop an industry review process for items such as supporting documents - the RSPM indicates that supporting documents will be approved by the Standing Committees.</p>			
MIPS & LTIS	X		<p>The process outlined in the SAR presumes that the Region would be responsible initiating the certification. The MIPS believes that NERC should be responsible for conducting the certification process.</p> <p>To avoid the appearance of a conflict of interest, the opportunity of the applicant to approve review team members should be removed. (e.g. step 9)</p>

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			The process assumes that the IDC continues to exist; consequently, step 6 should be removed from the certification process.
			<p>The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p> <p>The intent of the provision (in step 9) was to allow the applicant to reject a member with whom there was a history of conflicts. We will ask the industry if there is support for removing this provision.</p> <p>The SAR will be modified to change IDC to a more generic term that indicates data needed for modeling will be provided to NERC.</p>
Tony Jankowski We Energies # 3, 4, 5	X		<p>The process outlined in the SAR presumes that the Region would be responsible for initiating the certification. We believe that NERC should be responsible for conducting the certification process.</p> <p>To avoid the appearance of a conflict of interest, the opportunity of the applicant to approve review team members should be removed. (e.g. step 9).</p> <p>The process assumes that the IDC continues to exist. This should be removed.</p> <p>On page SAR-2 under Reliability Authority Certification Process #3, we feel the timeframe for completion listed at nine months is excessive. A three to six month timeframe would be preferred. The entity making the application deserves to have a resolution in a timely manner. A nine month waiting period is unreasonable.</p>
			<p>The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p> <p>The intent of the provision (in step 9) was to allow the applicant to reject a member with whom there was a history of conflicts. We will ask the industry if there is support for removing this provision.</p> <p>The SAR will be modified to change IDC to a more generic term that indicates data needed for modeling will be provided to NERC.</p> <p>We will ask the industry for feedback on the appropriate timeframe. The current control area certification has a six month timeframe. The OCTF tried to start with a timeframe that seemed feasible, given the expected increase in work load associated with the new certifications.</p>
Al DiCaprio MAAC #2	X		<p>Revise Step 6 of the Process and delete reference to IDC. There is no need to memorialize any give tool that may or may not be required in the future. It is suggested that the step be changed to read:</p> <p>" Nerc staff will begin the process by making appropriate changes to all applicable tools and databases associated with the RA. The Applicant and the Region will begin supply the necessary links and data to support those tools and databases. All revisions will be placed on hold until the entity is certified"</p>
			The SAR will be modified to change IDC to a more generic term that indicates data needed for modeling will be provided to NERC.

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John Blazekovich Exelon #1, 3, 5, 6	X		Because Exelon does not see this issue solely as a "core reliability" issue and believe the certification criteria and process should be defined by the appropriate NERC and or NAESB process. We believe it is premature for NERC to define the process at this time.
The criteria contained within the SARs was drafted to support reliability of the interconnected North American grid, not to support business practices. The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.			
Art Giardino PSE&G #1	X		The NERC Functional Model specifically states that it is not aligned with any organizational structure, nor will it define how functions are implemented. Establishing certification of the Organizations performing each function changes the model into an organizational driver and will constrain the "how" a given function is implemented. For this reason alone, this SAR should be cancelled.
As envisioned, an organization would apply for as many certifications as it desired. The SAR doesn't dictate what functions any organization can perform.			
Karl Kohlrus CWLP #5	X		I think regional review could cause problems in the case of MISO which spans four NERC regions.
As currently envisioned, the certification process would involve all affected regions, with all participants having an equal vote in determining if the certification requirements had been met. We are still seeking industry input to determine if this needs to be modified.			
William Reinke SERC #2	X		We agree that the RA needs to be certified. We do not agree that the certification process should be included in a standard.
The OCTF included the certification process in the SAR because the industry requested (during industry workshops) that the certification process be addressed consistently across Regional Boundaries. The only way to ensure that a process be followed consistently is to include the process within the standard. We will ask the industry to confirm that the process should be applied consistently across regional boundaries by being included in the SAR and associated Standard.			
Paul M. Cafone PSEG #1	X		Much of the material is ill defined and subject to individual interpretation.
Please provide comments with specific suggestions for changes.			
Gerald Rheault Manitoba Hydro #1, 3, 5	X		Manitoba Hydro believes that the entire section entitled "Detailed Description of New Standard or Revision to Existing Standard" should be removed from the SAR. The SAR documentation should only start at the section entitled "Reliability Authority Certification Criteria". The Standard which will be produced from this SAR should only deal with "Criteria" and not "Process". The documentation contained in the section entitled "Detailed Description of New Standard or Revision to Existing Standard" is very relevant in the overall process of certification and should be included in the administrative documentation related to this Standard but does not belong in the Standard itself.

<p>The OCTF included the certification process in the SAR because the industry requested (during industry workshops) that the certification process be addressed consistently across Regional Boundaries. The only way to ensure that a process be followed consistently is to include the process within the standard. We will ask the industry to confirm that the process should be applied consistently across regional boundaries by being included in the SAR and associated Standard.</p>			
Roger Green SOCO Gen #4		X	<p>See our response to Question 14.</p> <p><i>{RA_14. The SAR should establish the minimum acceptable certification processes and criteria that are needed to ensure reliability requirements are met. However, as the standard itself is being developed, the industry may identify changes that would enhance the process and/or criteria. Therefore, provisions should be made in the SAR to permit enhancements to the certification process and criteria during development of the standard itself. One approach would be for the SAR to only outline the key minimum elements that should be included in the certification process, and not try to define specific steps.}</i></p>
<p>If the need for a modification is identified during the SAR Drafting stage, the SAR DT can make modifications to the SAR. The scope of each standard must be defined within a SAR and once that SAR is approved to go to the standard drafting stage, additional changes to the scope of the SAR cannot be made without re-posting the SAR. Standards Drafting Teams are limited to developing details for requirements that have already been identified in the SAR. Once the standard is approved, modifications may be initiated to the standard by submitting a new SAR that indicates what changes are needed. The process for updating an approved standard is addressed in the RSPM.</p>			
Roman Carter for Tony Reed Southern Co en and En Mkt #1, 3, 5, 6		X	<p>As the standard itself is being developed, the industry may identify additional elements or details that would enhance or streamline the process. Therefore, provisions should be made in the SAR to permit enhancing or streamlining the certification process during development of the standard itself.</p>
<p>If the need for a modification is identified during the SAR Drafting stage, the SAR DT can make modifications to the SAR. The scope of each standard must be defined within a SAR and once that SAR is approved to go to the standard drafting stage, additional changes to the scope of the SAR cannot be made without re-posting the SAR. Standards Drafting Teams are limited to developing details for requirements that have already been identified in the SAR. Once the standard is approved, modifications may be initiated to the standard by submitting a new SAR that indicates what changes are needed. The process for updating an approved standard is addressed in the RSPM.</p>			
Kathleen Goodman ISO New England #2		X	
John Stickley AECl #1		X	
Michael Desselle AEP #1, 3, 5, 6		X	
Sam Jones ERCOT #2		X	

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Barry Gee National Grid #1		X	
William Smith Allegheny #1		X	
David Little Nova Scotia #1,3,5		X	
A. Ralf Rufrano NYPA #1		X	
Ray Morella First Energy #1		X	
John Muir Con Ed #1		X	
Andrew Wilcox NB Power #1		X	
Alan Johnson Mirant #6		X	
Ken Githens Allegheny #5		X	
Ed Groce Avista #5		X	
Guy Zito NPCC #2		X	
Tom Pruitt (Duke Energy Grid) #1		X	
Lee Gladish CWLP #4		X	
Jim Cyrulewski, International Trans Company #1		X	
Martin Boisvert, HQ, #1		X	
Stuart Goza TVA #1		X	
Gordon Pietsch Great River Energy #1		X	
George Bartlett Entergy Svcs #1, 3, 5		X	
Peter Burke [submitting responses for ATC's Alan Staats and Bobbi Welch] ATC #1		X	

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Ed Riley CISO		X	
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7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.

Commenter	Yes	No	Comments
Kathleen Goodman ISO New England #2	X		Who will be responsible for ensuring that all areas have a RA/RC oversight and how will this process be handled?
It is envisioned that the Regions will have the responsibility to ensure that all areas are covered by a RA. It is also envisioned that this will be accomplished in conjunction with the registration process.			
Alan Johnson Mirant #6	X		It's unclear what steps can be taken to resolve disagreement among regions in the case of a RA that crosses regions. Language could potentially be added to step 11 in order to resolve this. Maybe step 18 already addresses this. Also, in step 17, I think clarity should be provided as to what time period NERC has to determine a start date for the approved Applicant and the criteria that will be used to make said determination.
It is envisioned that a review team that includes representation for all affected Regions and that the certification decision would be made as a team would accomplish the certification. The decision to certify will be made by the entire team and would not be individual Regional decisions.			
As envisioned, the Region and the applicant would agree upon a 'start date' and would give this date to NERC. The SAR will be modified to clarify this.			
MIPS & LTIS	X		There is not a provision for review of certification by organizations that would be subordinate to the RA. In step 7 of the certification process, the questionnaire should be sent to all members of the authorities and functions affected. Notification of the certification should be posted to the industry at-large and an opportunity should be made available for submission of comments prior to completion of the certification process.
As currently envisioned, questionnaires would be sent the Transmission Operators and Balancing Authorities subordinate to the RA. (item 7 in process). If you feel that there are other functions subordinate to the RA that need to participate in this process, please submit additional comments identifying these additional functions.			
The certification process provides ample opportunity for those entities that could interact with the applicant. The need to post it to the industry-at-large does not appear to be warranted.			
Tony Jankowski We Energies # 3, 4, 5	X		There is not a provision for review of certification criteria and requirements by organizations that would be subordinate to the RA. This should be part of the initial questionnaire.
As currently envisioned, questionnaires would be sent the Transmission Operators and Balancing Authorities subordinate to the RA. (item 7 in process). If you feel that there are other functions subordinate to the RA that need to participate in this process, please submit additional comments identifying these additional functions.			
Art Giardino PSE&G #1	X		Certification of organizations performing reliability functions will cause costs to increase for the target organization, the Regional Council, and NERC. Collection of these costs are not

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			included in current tariffs and Operating Agreements. In addition, if a single organizations chooses to perform multiple functions, they are subject to redundant assessment and reporting requirements. Until a thorough cost benefit analysis is performed that clearly demonstrates a measurable reliability enhancement that justifies these costs, this SAR should be cancelled.
<p>It is envisioned that if an entity applies for multiple functions, the certification process could be handled once and would address all required elements for the certifications.</p> <p>Development of a cost benefit analysis is outside the scope of the SAR DT.</p>			
John Blazekovich Exelon #1, 3, 5, 6	X		Because Exelon does not see this issue solely as a "core reliability" issue and believe the certification criteria and process should be defined by the appropriate NERC and or NAESB process. We believe it is premature for NERC to define the process at this time.
<p>The criteria contained within the SARs was drafted to support reliability of the interconnected North American grid, not to support business practices.</p> <p>The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.</p>			
William Reinke SERC #2	X		Consider adding provisions as follows: 1) The RA must begin operation within one year of certification. The RA must be recertified if it has not begun operation within that time frame; and 2) The process should allow for decertification of a RA in the event of a merger, acquisition, or other reason.
<p>We will ask the industry if there is support to add these requirements.</p>			
Paul M. Cafone Public Service Electric and Gas Company	X		Now we get to the what's NOT there portion. What does NERC staff making modeling changes in the IDC mean? Whoa Big Fella, don't change anything without involving those that will be dramatically affected by the IDC changes. Who is going to settle out the Regional differences found in item 7? The Review Team is too small. There are no minimum requirements for a Interchange Authority Facility or Staff. In item 13, deficiencies are mentioned. Minimum requirements are necessary before one can say that something is deficient.
<p>Regional models must be updated to ensure that reliability analyses can be conducted. The revised SAR does not include a specific reference to the IDC, but does indicate that required data must be provided to support reliability models.</p> <p>Regional differences that are included in certification must be identified and approved by the industry as the SAR/standard is developed.</p> <p>Please provide specific suggestions on the size of the review team.</p> <p>Details on the requirements for the Control Center Facility or Staff will be addressed by the Standards Drafting Team.</p> <p>The expected performance (minimum requirements) will be developed by the Standards Drafting Team.</p>			

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Roman Carter for Tony Reed Southern Co en and En Mkt #1, 3, 5, 6		X	However, as the standard itself is being developed, the industry may identify additional elements or details that would enhance or streamline the process. Therefore, provisions should be made in the SAR to permit enhancing or streamlining the certification process during development of the standard itself.
If the need for a modification is identified during the SAR Drafting stage, the SAR DT can make modifications to the SAR. The scope of each standard must be defined within a SAR and once that SAR is approved to go to the standard drafting stage, additional changes to the scope of the SAR cannot be made without re-posting the SAR. Standards Drafting Teams are limited to developing details for requirements that have already been identified in the SAR. Once the standard is approved, modifications may be initiated to the standard by submitting a new SAR that indicates what changes are needed. The process for updating an approved standard is addressed in the RSPM.			
Roger Green SOCO Gen #4		X	None that we can think of at this stage. However, see our response to Question 14. <i>{RA_14. The SAR should establish the minimum acceptable certification processes and criteria that are needed to ensure reliability requirements are met. However, as the standard itself is being developed, the industry may identify changes that would enhance the process and/or criteria. Therefore, provisions should be made in the SAR to permit enhancements to the certification process and criteria during development of the standard itself. One approach would be for the SAR to only outline the key minimum elements that should be included in the certification process, and not try to define specific steps.}</i>
If the need for a modification is identified during the SAR Drafting stage, the SAR DT can make modifications to the SAR. The scope of each standard must be defined within a SAR and once that SAR is approved to go to the standard drafting stage, additional changes to the scope of the SAR cannot be made without re-posting the SAR. Standards Drafting Teams are limited to developing details for requirements that have already been identified in the SAR. Once the standard is approved, modifications may be initiated to the standard by submitting a new SAR that indicates what changes are needed. The process for updating an approved standard is addressed in the RSPM.			
Tom Pruitt (Duke Energy Grid) #1	X		See comment on question 7 on TOP comment form. <i>{TOP_7. To reiterate, NERC should lead the review and make the certification decision.}</i>
There was no clear industry consensus on this issue. We have provided some additional information and are asking the industry to take another look at this part of the process.			
Lee Gladish CWLP #4	X		Certification of personnel should include the requirement of the "appropriate" certification. IE: There are now multiple credentials, and the RA must have Personnel with RA credentials.
The SAR will be revised to include specific language to more specifically indicate which system operator credentials are acceptable.			
Linda Campbell for FRCC OC #1, 3,4,5			The FRCC OC does have questions regarding several parts of the certification process, but as stated earlier, this should not be part of the standard. The process should be reviewed by the industry in an open due process forum, but, it should not be considered a reliability

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			standard. FRCC will hold our questions on the process for later review.
<p>The OCTF that drafted the SAR asked the advice of NERC's legal counsel regarding whether to include the certification process within the Certification Standards. The response was that if a process/procedure must be followed by all entities in the same way, then the process/procedure must be included within the standard. The 'process' does not need to be included in the SAR, but does need to be included in the associated standard. The OCTF felt that without presenting the process, the industry would not have the information needed to understand how the process will be administered. During the workshops held by the OCTF, there were very clear directions to develop a process that was applied evenly from Region to Region. The SAR DT is seeking additional industry input on this issue.</p>			
Gerald Rheault Manitoba Hydro !1, 3, 5			The certification process to be followed should not be included in the Standard and therefore also not in the SAR. That is an administrative document and does not belong in the Standard. See question 6 comment for further details.
<p>The OCTF that drafted the SAR asked the advice of NERC's legal counsel regarding whether to include the certification process within the Certification Standards. The response was that if a process/procedure must be followed by all entities in the same way, then the process/procedure must be included within the standard. The 'process' does not need to be included in the SAR, but does need to be included in the associated standard. The OCTF felt that without presenting the process, the industry would not have the information needed to understand how the process will be administered. During the workshops held by the OCTF, there were very clear directions to develop a process that was applied evenly from Region to Region. The SAR DT is seeking additional industry input on this issue.</p>			
Paul Elwing Lakeland Elec #3			Certification Process should be reviewed separately in open forum as SAR's are
<p>The OCTF that drafted the SAR asked the advice of NERC's legal counsel regarding whether to include the certification process within the Certification Standards. The response was that if a process/procedure must be followed by all entities in the same way, then the process/procedure must be included within the standard. The 'process' does not need to be included in the SAR, but does need to be included in the associated standard. The OCTF felt that without presenting the process, the industry would not have the information needed to understand how the process will be administered. During the workshops held by the OCTF, there were very clear directions to develop a process that was applied evenly from Region to Region. The SAR DT is seeking additional industry input on this issue.</p>			
Ed Riley CISO	X	X	
A. Ralf Rufrano NYPA #1		X	
Ken Githens Allegheny #5		X	
Ed Groce Avista #5		X	
Guy Zito NPCC #2		X	
Ray Morella First Energy #1		X	
John Muir Con Ed #1		X	

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Andrew Wilcox NB Power #1		X	
Alan Boesch NBPP #1		X	
David Little Nova Scotia #1,3,5		X	
Barry Gee National Grid #1		X	
Karl Kohlrus CWLP #5		X	
William Smith Allegheny #1		X	
Michael Desselle AEP #1, 3, 5, 6		X	
John Stickle AECI #1		X	
Al DiCaprio MAAC #2		X	
Gordon Pietsch Great River Energy #1		X	
George Bartlett Entergy Svcs #1, 3, 5		X	
Sam Jones ERCOT #2		X	
Jim Cyrulewski, International Trans Company #1		X	
Martin Boisvert, HQ, #1		X	
Stuart Goza TVA #1		X	

8. Which of the following agreements do you think are necessary? (Check all that you feel should apply) Each applicable:

Summary Consideration: The consensus of the industry comments received indicates a need to have agreements between the RA and its associated RA's, BA's, IAs, TOPs and TSPs. An agreement is defined as: A contract or other document delineating an arrangement that expresses assent by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.

Commenter	RA	BA	IA	TO P	TS P	Comments
Al DiCaprio MAAC #2	X	X	X	X	X	The RA should have formal agreements with all of the entities that provide reliability services. These agreements should recognize the RA as the final authority in its area, and should lay out the rules for dealing with other RAs during such emergencies.
The consensus of the industry comments received indicates a need to have agreements between the RA and its associated RA's, BA's, IAs, TOPs and TSPs.						
Tom Pruitt (Duke Energy Grid) #1	X	X	X	X	X	This authority/provider should have agreements in place with all functional entities with which it interfaces.
The consensus of the industry comments received indicates a need to have agreements between the RA and its associated RA's, BA's, IAs, TOPs and TSPs.						
Alan Johnson Mirant #6	X	X		X		Because the RA requires information from the BA should coordinate with it and neighboring RAs. May need to direct the TO on occasion, so an agreement detailing process may be required. It's also possible that being deemed as certified covers this base.
The consensus of the industry comments received indicates a need to have agreements between the RA and its associated RA's, BA's, IAs, TOPs and TSPs.						
Alan Boesch NBPP #1		X	X	X	X	Maybe this should include generators and LSE's. Should the RA authority be described in a Standard or part of other Standards? I think consistency will be important.
The consensus of the industry comments received indicates a need to have agreements between the RA and its associated RA's, BA's, IAs, TOPs and TSPs. The SAR DT will seek additional industry input into any additional functions that agreements should be in place with.						
Mike Miller Southern Co						Add Transmission Owner.

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<p>The consensus of the industry comments received indicates a need to have agreements between the RA and its associated RA's, BA's, IAs, TOPs and TSPs. The SAR DT will seek additional industry input into any additional functions that agreements should be in place with.</p>						
Art Giardino PSE&G #1						None, function of the RTO.
Ed Riley CISO	X	X	X	X	X	The use of the term "agreement" is not defined sufficiently. The term could refer to a contract, a tariff, or processes and procedures, possibly even undocumented, between two or more entities. It appears that, at the minimum, procedures for both normal and emergency operations should be in place and that these procedures could be reviewed as part of the certification process.
<p>The intent of this requirement was to ensure that the hierarchical authority for protecting reliability was agreed upon in advance. It is envisioned, that if existing documents contain the elements required in these BA agreements, then those existing documents may be used to meet this certification requirement. An agreement is defined as: A contract or other document delineating an arrangement that expresses assent by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.</p>						
Karl Kohlrus CWLP #5	X	X	X	X		There should still be a streamlined process that allows a traditional Control Area which encompasses all of these functions to be certified without needing all these agreements.
<p>As envisioned, each entity could develop its own agreements but to meet this certification requirement, each agreement would need to contain certain elements. The details of what must be included in each of these agreements will be developed by the Standards Drafting Team.</p>						

<p>Gerald Rheault Manitoba Hydro #1, 3, 5</p>	<p>X</p>		<p>X</p>	<p>X</p>	<p>X</p>	<p>For regions and entities, where the organizational as well as functional unbundling of the functions defined in the Functional Model has occurred, there is a need to develop Agreements which define the responsibilities of each function to one another.</p> <p>For regions and entities, where physical unbundling without organizational unbundling or no unbundling has occurred, there should be policy documents in place which define the responsibilities and authority of one function relative to another which serves the same purpose as an Agreement between the two functions within the same entity.</p> <p>The SAR and the subsequent Standard to be developed should be flexible enough to address both of these situations. An agreement should be required when separate organizational entities are involved and appropriate policies should be acceptable when different functions within the same entity are involved.</p>
<p>An agreement is defined as: A contract or other document delineating an arrangement that expresses assent by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.</p> <p>As envisioned, each entity could develop its own agreements but to meet this certification requirement, each agreement would need to contain certain elements. The details of what must be included in each of these agreements will be developed by the Standards Drafting Team.</p>						
<p>Roman Carter for Tony Reed Southern Co en and En Mkt #1, 3, 5, 6</p>						<p>It is important that the Authorities have sufficient arrangements (e.g. agreements) in place to carry out its duties and to support the other certified Authorities. However, we do not believe that agreements defining their authority is necessary in the SAR stage. We do agree that the Reliability Authority candidate should have the necessary elements prepared to initiate the agreements once certified.</p>
<p>As envisioned, certification is a formal process to verify that an entity had the capability of operating reliably. The consensus of the industry is that these agreements need to be in place</p>						

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<p>Tony Jankowski We Energies # 3, 4, 5</p>						<p>The boundary of responsibility should be conducted through a registration process facilitated by NERC: The Transmission Owner designates its Transmission Operator and each Transmission Operator designates its Reliability Authority.</p> <p>This registration conveys the expectation that the operator and RA will comply with NERC Standards and has the responsibility to carry out good utility practice.</p>
<p>The OCTF is developing a registration process for functions. We will forward this comment to the OCTF.</p>						
<p>Paul Elwing Lakeland Elec #3</p>						<p>Regional Security Process/Reliability Plans should identify responsibilities & authorities of each function regarding reliability, individual agreements inefficient/redundant.</p>
<p>The intent of this requirement was to ensure that the hierarchical authority for protecting reliability was agreed upon in advance. It is envisioned, that if existing documents contain the elements required in these RA agreements, then those existing documents may be used to meet this certification requirement. An agreement is defined as: A contract or other document delineating an arrangement that expresses assent by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.</p>						
<p>MIPS & LTIS</p>						<p>Specific, standardized agreements should not be required; rather there should be a finding that adequate arrangements are in place that would let the prospective RA carry out the responsibilities of a RA.</p>
<p>As envisioned, each entity could develop its own agreements but to meet this certification requirement, each agreement would need to contain certain elements. The details of what must be included in each of these agreements will be developed by the Standards Drafting Team.</p>						
<p>Linda Campbell for FRCC OC #1, 3,4,5</p>						<p>FRCC does not believe that individual agreements with each entity are necessary. A Region's Security Process (Reliability Plan) should identify the responsibilities and authorities of each function in regards to reliability. Other areas covered in an agreement most likely would be commercial considerations and not reliability responsibilities.</p>

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The intent of this requirement was to ensure that the hierarchical authority for protecting reliability was agreed upon in advance. As envisioned, if existing documents contain the elements required in these RA agreements, then those existing documents may be used to meet this certification requirement. An agreement is defined as: A contract or other document delineating an arrangement that expresses assent by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.

Peter Burke [submitting responses for ATC's Alan Staats and Bobbi Welch] ATC #1	X	X	X	X	X	
Guy Zito NPCC #2	X	X	X	X	X	
Ken Githens Allegheny #5	X	X	X	X	X	
Martin Boisvert, HQ, #1	X	X	X	X	X	
Stuart Goza TVA #1	X	X	X	X	X	
Lee Gladish CWLP #4	X	X	X	X	X	
Roger Green SOCO Gen #4	X	X	X	X	X	
Gordon Pietsch Great River Energy #1	X	X	X	X	X	
George Bartlett Entergy Svcs #1, 3, 5	X	X	X	X	X	
William Smith Allegheny #1	X	X	X	X	X	
David Little Nova Scotia #1,3,5	X	X	X	X	X	
A. Ralf Rufrano NYPA #1	X	X	X	X	X	
Ray Morella First Energy #1	X	X	X	X	X	
John Muir Con Ed #1	X	X	X	X	X	
Andrew Wilcox NB Power #1	X	X	X	X	X	

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John Blazekovich Exelon #1, 3, 5, 6	X	X	X	X	X	
Jim Cyrulewski, International Trans Company #1	X	X	X	X	X	
William Reinke SERC #2	X	X	X	X	X	
Paul M. Cafone PSE&G #1	X	X	X	X	X	
John Stickley AECI #1	X	X	X	X		
Terri M. Kuehneman SRP #1,3	X	X	X	X		
Sam Jones ERCOT #2	X	X		X	X	
Ed Groce Avista #5	X	X		X		
Kathleen Goodman ISO New England #2		X	X	X	X	
Michael Desselle AEP #1, 3, 5, 6	X	X				

9. What other agreements should be required for the Reliability Authority?

Background Information/Definition for SAR Comment Form: The intent of the requirement for agreements was to provide a vehicle for identifying the hierarchy of authority between an organization and the parties with which they interact. An agreement is defined as a contract or other document delineating an arrangement that expresses assent by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.

Summary consideration – There were several recommendations that agreements be added for Generators (generator owners), Transmission Owners, and LSEs. It is envisioned that those entities would have agreements with the BA and there would also be agreements between the RA and the BA and between the BA and the Generators, Transmission Owners, and LSEs to ensure that they would respond to requests for actions to protect reliability. It does not appear to be necessary for the RA to have an agreement with the Generator, Transmission Owner, and LSE. We will seek affirmation from the industry on this interpretation.

Commenter	Comments
Jim Cyrulewski, International Trans Company #1	Need an agreement with Generation Operation and possibly Generation Owners.
There were several recommendations that agreements be added for Generators (generator owners), Transmission Owners, and LSEs. We will ask the industry for more input on whether these agreements are needed in the certification requirements.	
Michael Desselle AEP #1, 3, 5, 6	Each applicable generator in their footprint. Per the NERC functional model, the Balancing Authority is to "request Generators to provide interconnected operations services and requests Generators to implement redispatch for congestion management as directed by the Reliability Authority." Thus, it seems reasonable to assume they will need agreements in place with the generators.
There were several recommendations that agreements be added for Generators (generator owners), Transmission Owners, and LSEs. We will ask the industry for more input on whether these agreements are needed in the certification requirements.	
Tony Jankowski We Energies # 3, 4, 5	The RA should have agreements in place that support the concept of the "Coordinate Operations" standard with boundary connected authorities and operators.
Ed Groce Avista #5	Currently, empowerment agreements are used to "authorize" reliability coordinators to issue directives to maintain system reliability. The content of those agreements should be reflected in new agreements as above.
Mike Miller Southern Co	Add agreement between RA and Transmission Owner, during normal / emergency operation since it is

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	likely that owner could be held responsible during litigation.
There were several recommendations that agreements be added for Generators (generator owners), Transmission Owners, and LSEs. We will ask the industry for more input on whether these agreements are needed in the certification requirements.	
Tom Pruitt (Duke Energy Grid) #1	The RA should also sign the NERC Standard of Conduct. The NERC Standard of Conduct should be explicitly identified in the criteria as one of the agreements for which signing is required.
There were several recommendations that agreements be added for Generators (generator owners), Transmission Owners, and LSEs. We will ask the industry for more input on whether these agreements are needed in the certification requirements.	
Ed Riley CISO	All agreements deemed necessary to ensure system reliability, including agreements with operating data providers (TOW).
There were several recommendations that agreements be added for Generators (generator owners), Transmission Owners, and LSEs. We will ask the industry for more input on whether these agreements are needed in the certification requirements.	
Linda Campbell for FRCC OC #1, 3,4,5	The FRCC is not sure that any agreements are necessary.
There were several recommendations that agreements be added for Generators (generator owners), Transmission Owners, and LSEs. We will ask the industry for more input on whether these agreements are needed in the certification requirements.	
Gerald Rheault Manitoba Hydro #1, 3, 5	The ones included in the SAR are adequate.
Peter Burke [submitting responses for ATC's Alan Staats and Bobbi Welch] ATC #1	We feel that this is important due to the interconnected nature of the electrical system.
Roman Carter for Tony Reed Southern Co en and En Mkt #1, 3, 5, 6	Once a Reliability Authority becomes certified, it should include agreements defining responsibilities and authority (during normal and emergency conditions) with respect to Generators. This would include nuclear plants because they not only generate power to the grid, they also rely on the grid as their preferred power source for safe shutdown equipment.
As envisioned, certification is a formal process to verify that an entity had the capability of operating reliably. The consensus of the industry is that these agreements need to be in place. There were several recommendations that agreements be added for Generators (generator owners), Transmission Owners, and LSEs. We will ask the industry for more input on whether these agreements are needed in the certification requirements.	
Addressing requirements for nuclear plants is addressed by the Nuclear Regulatory Commission.	
Roger Green SOCO Gen #4	Agreements will be needed that define responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to generating plants, including nuclear plants because they rely on the grid as their preferred power source for safe shutdown equipment.

There were several recommendations that agreements be added for Generators (generator owners), Transmission Owners, and LSEs. We will ask the industry for more input on whether these agreements are needed in the certification requirements.

Addressing requirements for nuclear plants is addressed by the Nuclear Regulatory Commission.

MIPS & LTIS

Specific, standardized agreements should not be required; rather there should be a finding that adequate arrangements are in place that would let the prospective RA carry out the responsibilities of a RA.

As envisioned, each entity could develop its own agreements but to meet this certification requirement, each agreement would need to contain certain elements. The details of what must be included in each of these agreements will be developed by the Standards Drafting Team.

10. Who should be required to sign a confidentiality agreement?

Summary Consideration: Industry consensus indicates a need for the RA to sign the confidentiality agreement should be a part of the criteria. For this reason the requirement will remain in the criteria.

Commenter	RA	BA	IA	TOP	TSP	Comments
Jim Cyrulewski, International Trans Company #1	X	X	X	X	X	Not sure why this question asked. Already covered in BA, IA and TO SARs.
Tom Pruitt (Duke Energy Grid) #1	X	X	X	X	X	Any entity which receives data that is considered to be confidential should sign a confidentiality agreement.
Art Giardino PSE&G #1	X	X	X	X	X	All participants. Any violation should have immediate, severe sanctions.
MIPS & LTIS	X	X	X	X	X	The certification process should not require the signing of a confidentiality agreement. Subsequent access to confidential operational data would be subject to the signing of a confidentiality agreement. To the extent that the confidential information is NERC related, the agreement should be a "NERC" confidentiality agreement. Relative to certifying RA's, the status of the other groups' signing is irrelevant. This question is beyond the scope of RA certification by asking about organizations other than the RA.
Industry consensus indicates a need for the RA to sign the confidentiality agreement should be a part of the criteria. For this reason the requirement will remain in the criteria.						
Alan Johnson Mirant #6	X	X	X	X	X	Any entity that has access to information used to maintain the operational security of the bulk power system should be required to sign a confidentiality agreement. Perhaps this is overkill for those entities operating under a code of conduct. Further, the issue may be better addressed in the NAESB forum as this is not really a reliability issue.

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Industry consensus indicates a need for the RA to sign the confidentiality agreement should be a part of the criteria. For this reason the requirement will remain in the criteria.						
Peter Burke [submitting responses for ATC's Alan Staats and Bobbi Welch] ATC #1	X	X	X	X	X	Any party having access to confidential transmission information.
Roman Carter for Tony Reed Southern Co en and En Mkt #1, 3, 5, 6	X		X	X	X	Without knowing details of the confidentiality agreement and whether it would prevent an entity from performing other economic generator-related functions, it is unclear whether a Balancing Authority should be required to sign.
Roger Green SOCO Gen #4	X		X	X	X	Without knowing the details of the confidentiality agreement and whether it would prevent an entity from performing other economic generator-related functions, it is unclear whether a Balancing Authority should be required to sign.
Tony Jankowski We Energies # 3, 4, 5	X					Relative to certifying RA's, the status of the other groups' signing is irrelevant. The RA should be required to sign at least a NERC Confidentiality Agreement.
Industry consensus indicates a need for the RA to sign the confidentiality agreement should be a part of the criteria. For this reason the requirement will remain in the criteria.						
Linda Campbell for FRCC OC #1, 3,4,5	X					Anyone providing a reliability function with access to commercially sensitive information should be required to sign a confidentiality agreement. A region may also have a separate confidentiality agreement in addition to the NERC agreement. However, is this more of a commercial issue and should it be considered by NAESB rather than NERC? Also, the other entities identified in this question should be addressed through their own respective SAR.
Industry consensus indicates a need for the RA to sign the confidentiality agreement should be a part of the criteria. For this reason the requirement will remain in the criteria.						
Paul Elwing Lakeland Elec #3	X					Entities handling commercially sensitive information
Industry consensus indicates a need for the RA to sign the confidentiality agreement should be a part of the criteria. For this reason the requirement will remain in the criteria.						

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Gordon Pietsch Great River Energy #1						If this question is relevant to question 8 above, then it should be included in the agreement defining responsibilities and authority. If the question is related to the review team, then confidentiality agreements should be in place for those participating on the review team, especially if they are activity employed in a particular function.
Industry consensus indicates a need for the RA to sign the confidentiality agreement should be a part of the criteria. For this reason the requirement will remain in the criteria. Issues relating to the review team confidentiality of information are covered in step 9 of the certification procedure.						
Ed Riley CISO						We are confused by this question - what type of confidentiality agreement are you considering? The NERC data confidentiality agreement or some other agreement?
Industry consensus indicates a need for the RA to sign the confidentiality agreement should be a part of the criteria. For this reason the requirement will remain in the criteria. As the criteria identifies, it is the NERC Confidentiality Agreement.						
Kathleen Goodman ISO New England #2						Entities requiring appropriate conduct likely already bound by FERC Order 888 / 889. This is a duplicative effort and should not be included.
FERC 888 and 889 only apply to FERC jurisdictional entities. The requirements contained in the 'organization' section of the SAR were intended to protect market sensitive reliability-related data.						
Gerald Rheault Manitoba Hydro !1, 3, 5						Manitoba Hydro doesn't see any purpose to signing a confidentiality Agreement. Any requirement for confidentiality in dealing with data from other entities should be addressed in the agreement between the Balancing (<i>Reliability</i>) Authority and the other functions.
The agreements addressed elsewhere were intended to address the relationships between authorities without delving into the details of the working relationships. The NERC Confidentiality Agreement addresses the protection of reliability-related data.						
Michael Desselle AEP #1, 3, 5, 6	X	X	X	X	X	
John Stickley AECI #1	X	X	X	X	X	
Lee Gladish CWLP #4	X	X	X	X	X	
Al DiCaprio MAAC #2	X	X	X	X	X	
John Blazekovich Exelon #1, 3, 5, 6	X	X	X	X	X	

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William Reinke SERC #2	X	X	X	X	X	
Paul M. Cafone Public Service Electric and Gas Company	X	X	X	X	X	
Stuart Goza TVA #1	X	X	X	X	X	
Barry Gee National Grid #1	X	X	X	X	X	
William Smith Allegheny #1	X	X	X	X	X	
David Little Nova Scotia #1,3,5	X	X	X	X	X	
A. Ralf Rufrano NYPA #1	X	X	X	X	X	
Ray Morella First Energy #1	X	X	X	X	X	
Andrew Wilcox NB Power #1	X	X	X	X	X	
Ken Githens Allegheny #5	X	X	X	X	X	
Guy Zito	X	X	X	X	X	
Martin Boisvert, HQ, #1	X	X	X	X		
Karl Kohlrus CWLP #5	X	X	X	X		
George Bartlett Entergy Svcs #1, 3, 5	X	X		X	X	
Sam Jones ERCOT #2	X	X		X	X	
Terri M. Kuehneman SRP #1,3	X					

11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.

Commenter	Yes	No	Comments
MIPS & LTIS	X		<p>If this is an initial certification for an RA, there may be reluctance of other entities to sign final agreements until the RA is actually certified. See #8 for further clarification.</p> <p>The certification criteria that would be contained in the standard should be more specific. References to entities in the Functional Model diagrams should be replaced with verb-oriented names that more clearly delineate that the Functional Model does not specify organizational structure.</p> <p><i>{RA_8. Specific, standardized agreements should not be required; rather there should be a finding that adequate arrangements are in place that would let the prospective RA carry out the responsibilities of a RA.}</i></p>
<p>As envisioned, certification is a formal process to verify that an entity had the capability of operating reliably. The consensus of the industry is that these agreements need to be in place.</p> <p>The details of the criteria (specific requirements, measures, expected performance/outcomes) will be developed by the Standards Drafting Team.</p> <p>It is envisioned that the current work being performed by the FMRTG will clarify some issues of the Functional Model.</p>			
Roman Carter for Tony Reed Southern Co en and En Mkt #1, 3, 5, 6	X		<p>Generally, the structure of a SAR is at a high level overview. The SAR, as written, would include specific details normally provided by the Standards Drafting Team in the Standards process. Including these details in the SAR will restrict the Standards Drafting Team and their flexibility to draft the Standard. Therefore, the SAR should identify the boundaries and the "must haves" only, and leave the specific details to the Standard Drafting Team.</p> <p>Would like clarification on the criteria in 4.3 "Documentation identifying the code of conduct for personnel performing the Balancing (Reliability) Authority responsibilities". What type of documentation?</p>

<p>The only detailed information contained in the SAR is the draft certification process. The OCTF included the certification process in the SAR because the industry requested (during industry workshops) that the certification process be addressed consistently across Regional Boundaries. The only way to ensure that a process be followed consistently is to include the process within the standard. We will ask the industry to confirm that the process should be applied consistently across regional boundaries by being included in the SAR and associated Standard. The OCTF felt that without including the process as part of the SAR, the industry may not understand how certification would be achieved.</p>			
<p>The code of conduct is intended to protect market sensitive reliability-related data. Each entity can develop its own code of conduct. The details of what would be required in a 'code of conduct' will be developed by the Standards Drafting Team.</p>			
Kathleen Goodman ISO New England #2	X		<p>See answer to Item 10.</p> <p><i>{RA_10. Entities requiring appropriate conduct likely already bound by FERC Order 888 / 889. This is a duplicative effort and should not be included.}</i></p>
<p>FERC 888 and 889 only apply to FERC jurisdictional entities. The requirements contained in the 'organization' section of the SAR were intended to protect market sensitive reliability-related data.</p>			
Gerald Rheault Manitoba Hydro #1, 3, 5	X		<p>Manitoba Hydro believes that the "code of conduct for personnel" referenced in sections 4.3 and 4.4 is unnecessary. The responsibilities, for each staff member performing functions as part of this functional authority, should be defined in the policy document for the functional authority.</p>
<p>Sections 4.3 and 4.4 go beyond listing the responsibilities for each staff member performing functions – requirements 4.3 and 4.4 ask that the staff members understand these responsibilities and that there be some documentation to this effect.</p>			
Al DiCaprio MAAC #2	X		<p>see comment on 'tools / IDC" above.</p> <p><i>{RA_6. Revise Step 6 of the Process and delete reference to IDC. There is no need to memorialize any give tool that may or may not be required in the future. It is suggested that the step be changed to read:</i></p> <p><i>" Nerc staff will begin the process by making appropriate changes to all applicable tools and databases associated with the RA. The Applicant and the Region will begin supply the necessary links and data to support those tools and databases. All revisions will be placed on hold until the entity is certified"</i></p>
<p>The SAR will be modified to change IDC to a more generic term that indicates data needed for modeling will be provided to NERC.</p>			
John Blazekovich Exelon #1, 3, 5, 6	X		<p>Because Exelon does not see this issue solely as a "core reliability" issue and believe the certification criteria and process should be defined by the appropriate NERC and or NAESB process. We believe it is premature for NERC to define the process at this time.</p>

<p>The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.</p>			
Roger Green SOCO Gen #4		X	<p>See our response to Question 14.</p> <p>{RA_14. The SAR should establish the minimum acceptable certification processes and criteria that are needed to ensure reliability requirements are met. However, as the standard itself is being developed, the industry may identify changes that would enhance the process and/or criteria. Therefore, provisions should be made in the SAR to permit enhancements to the certification process and criteria during development of the standard itself. One approach would be for the SAR to only outline the key minimum elements that should be included in the certification process, and not try to define specific steps.}</p>
<p>If the need for a modification is identified during the SAR Drafting stage, the SAR DT can make modifications to the SAR. The scope of each standard must be defined within a SAR and once that SAR is approved to go to the standard drafting stage, additional changes to the scope of the SAR cannot be made without re-posting the SAR. Standards Drafting Teams are limited to developing details for requirements that have already been identified in the SAR. Once the standard is approved, modifications may be initiated to the standard by submitting a new SAR that indicates what changes are needed. The process for updating an approved standard is addressed in the RSPM.</p>			
Tony Jankowski We Energies # 3, 4, 5			<p>The certification criteria and requirements contained in the standard need to be more specific and contain what constitutes failure to meet.</p>
<p>The details to support the criteria and requirements will be developed by the Standards Drafting Team.</p>			
Linda Campbell for FRCC OC #1, 3,4,5			<p>None that we could identify at this point, however, as stated earlier, the certification process itself should not be included in the SAR as we do not consider the process of certification a reliability standard, but we do agree that the criteria could be a reliability standard.</p>
<p>The OCTF that drafted the SAR asked the advice of NERC’s legal counsel regarding whether to include the certification process within the Certification Standards. The response was that if a process/procedure must be followed by all entities in the same way, then the process/procedure must be included within the standard. The ‘process’ does not need to be included in the SAR, but does need to be included in the associated standard. The OCTF felt that without presenting the process, the industry would not have the information needed to understand how the process will be administered. During the workshops held by the OCTF, there were very clear directions to develop a process that was applied evenly from Region to Region. The SAR DT is seeking additional industry input on this issue.</p>			
Paul M. Cafone Public Service Electric and Gas Company			<p>see my previous comments</p>
Michael Desselle AEP #1, 3, 5, 6		X	
John Stickley AECL #1		X	

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Lee Gladish CWLP #4		X	
Tom Pruitt (Duke Energy Grid) #1		X	
Martin Boisvert, HQ, #1		X	
Stuart Goza TVA #1		X	
Peter Burke [submitting responses for ATC's Alan Staats and Bobbi Welch] ATC #1		X	
Gordon Pietsch Great River Energy #1		X	
George Bartlett Entergy Svcs #1, 3, 5		X	
Sam Jones ERCOT #2		X	
Barry Gee National Grid #1		X	
Karl Kohlrus CWLP #5		X	
William Smith Allegheny #1		X	
David Little Nova Scotia #1,3,5		X	
Paul Elwing Lakeland Elec #3		X	
Ray Morella First Energy #1		X	
John Muir Con Ed #1		X	
Andrew Wilcox NB Power #1		X	
Alan Johnson Mirant #6		X	
Ed Groce Avista #5		X	
Guy Zito NPCC #2		X	
Jim Cyrulewski, International Trans		X	

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Company #1			
William Reinke SERC #2		X	
Ed Riley CISO		X	

12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.

Commenter	Yes	No	Comments
Barry Gee National Grid #1 David Little Nova Scotia #1,3,5 Ralf Rufrano NYPA #1 John Muir Con Ed #1 Guy Zito NPCC #2	X X X X X		The SAR should provide flexibility for information routing to fully integrate the TO in the process.
The current process does include integration of the Transmission Operator in both the completion of questionnaires and the candidacy to serve as a review team member.			
Tom Pruitt (Duke Energy Grid) #1	X		RE criterion 5.9 -- We (current industry RC functions) currently accept all transactions and allow the IDC to determine curtailments, adjustments, etc. What anticipated rule changes will allow the RA to perform this function? RE criterion 5.11 -- What does this criterion specifically mean? Is it simply intended as a catch-all for any process/procedure not previously mentioned?
RE criterion 5.9 – The entity performing the RA function may in fact be the same entity that is performing the current RC responsibilities. If this is not the same in the future, process changes will be required to ensure that the appropriate party completes the task.			
RE criterion 5.11 – Specifics of the criteria will be defined in the Standard Drafting phase of the process.			
Roman Carter for Tony Reed Southern Co en and En Mkt #1, 3, 5, 6	X		Section 5 titled Data Acquisition and System Analysis: Need to add "5.12 Process/Procedures in place for evaluation of Reliability activities on generating plants and notification to generator operators". For example, transmission line outages can directly or indirectly affect generating plants. Nuclear plants may have to be notified of certain line outages so they can evaluate the impacts of the outages on the operability of the grid (their "preferred power source" to safe shutdown equipment) and the plant. Appropriate notifications must be made to nuclear plant operators and appropriate operational studies and contingency analyses of the nuclear plant offsite power source may have to be performed.
It appears that this is covered in the RA criteria 5.5.			
Terri M. Kuehneman SRP #1,3	X		Which deficiencies would be serious enough for denial of certification? Which would be categorized as acceptable for conditional "pending certification" status? Or will this be discretionary for the team to decide?

			Add a 4.5 to the criteria: Documentation identifying that the Reliability Authority System Operators have written authority to implement manual load shedding when necessary.
<p>Deficiencies will be based on the details that will be identified in the standard. An entity must satisfy all of the requirements in order to obtain certification. Conditional certification is only intended to allow for certification to go through the approval process within the Region with the applicant's understanding that no certification will be issued until the requirements are satisfied.</p> <p>Criteria 6.1 provides the mechanism to identify this authority.</p>			
Kathleen Goodman ISO New England #2	X		Having a process/procedure in place does not ensure that the reliability requirements are being fulfilled.
<p>We agree that they do not ensure that the requirements are being fulfilled, but it does ensure that the entity has the means to comply and the fulfillment perspective is satisfied through the NERC/Regional Compliance and Enforcement Programs.</p>			
Gordon Pietsch Great River Energy #1 Michael Desselle AEP #1, 3, 5, 6	X		<p>1) We find it interesting that no where in the criteria does it state that the Balancing Authority will operate within the NERC requirements for control performance and disturbance recovery and comply with reliability requirements specified by Reliability Authority. The criteria does state that they are to calculate and report performance for CPS and DCS, but doesn't state they are intended to operate within those standards.</p> <p>2) A physical backup location should be required.</p> <p>3) Standards developed by NERC/NAESB should be adhered to especially with regard to data acquisition and system analysis.</p>
<p>The BA criteria does identify in 4.1 the requirement to have elements in place for adhering to NERC Standards.</p> <p>Physical back-up facilities is not defined, but an addition will be made to the criteria that requires an entity to have in place a mechanism that would ensure continued operation during normal and emergency operations.</p> <p>Although it is agreed that NERC/NAESB standards should be adhered to, this criteria only covers those issues that are reliability related.</p>			
Linda Campbell for FRCC OC #1, 3,4,5	X		<p>The definition of the RA function is extremely vague. It is not clear if the RA is the same as today's Reliability Coordinator or if it is something more. This SAR should be placed on hold until the RA is clearly understood by the entire industry.</p> <p>There are no requirements for communication (voice, such as the hotline, etc.) tools or systems, especially with the BA, TOP and other RA's.</p> <p>Most of the items in section 5 of this SAR speak to having a procedure/process in place, but say nothing about having tools to implement the process or procedure. Having a process or procedure without the ability to implement is not enough.</p> <p>Item 5.2 requires day ahead hourly dispatch pattern to be given to the RA. FRCC does not support this requirement at all. The individual RA, or the Region(s) should determine what is required to support their security process (reliability plan). A RA may only require a day</p>

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			ahead commitment schedule and not hourly dispatch values. NERC should NOT make this hourly dispatch requirement decision.
It is envisioned that the current work of the FMRTG will further define the function of the Reliability Authority. There will be some modifications to the criteria that will further define the addition of tools to the criteria. If FRCC does not agree with any aspect of the criteria it is suggested that they submitted a Regional difference during the next comment period.			
Paul Elwing Lakeland Elec #3	X		Definition of RA is insufficient
It is envisioned that the current work of the FMRTG will further define the function of the Reliability Authority.			
MIPS & LTIS	X		There should be a statement that clearly states that the RA applicant can comply with all applicable NERC standards. There is no description of the circumstances under which a RA would be decertified.
The SAR DT is making modifications to the criteria and will seek industry affirmation.			
Industry input is being sought to obtain additional information for the formation of de-certification procedures.			
Tony Jankowski We Energies # 3, 4, 5	X		There should be a statement that clearly states that the RA applicant can comply with all applicable NERC standards. There is no description of the circumstances under which a RA would be decertified. Need to clearly state that "All" listed criteria and requirements must be met -- no exceptions.
The SAR DT is making modifications to the criteria and will seek industry affirmation.			
Industry input is being sought to obtain additional information for the formation of de-certification procedures.			
Roger Green SOCO Gen #4	X		Section 5 titled Data Acquisition and System Analysis: Need to add "5.12 Process/procedures in place for evaluation of reliability activities on generating plants and notification to generator operators." For example, transmission line outages can directly or indirectly affect generating plants. Nuclear plants may have to be notified of certain line outages so they can evaluate the impacts of the outages on the operability of the grid (their "preferred power source" to safe shutdown equipment) and the plant. Appropriate notifications must be made to nuclear plant operators and appropriate operational studies and contingency analyses of the nuclear plant offsite power source must be performed. Also, see our response to Question 14. <i>{RA_14. The SAR should establish the minimum acceptable certification processes and criteria that are needed to ensure reliability requirements are met. However, as the standard itself is being developed, the industry may identify changes that would enhance the process and/or criteria. Therefore, provisions should be made in the SAR to permit enhancements to the certification process and criteria during development of the standard itself. One</i>

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			<i>approach would be for the SAR to only outline the key minimum elements that should be included in the certification process, and not try to define specific steps.</i>
It appears that this is covered in the RA criteria 5.5.			
Karl Kohlrus CWLP #5	X		Allow a single certification for traditional Control Areas.
While no certification is being designed for a 'control area', each organization may determine what certifications it wants to acquire. As envisioned, if an organization wants to apply for and acquire multiple certifications, all certifications could be acquired at the same time.			
William Reinke SERC #2	X		See #6, 7 <i>{RA_6. We agree that the RA needs to be certified. We do not agree that the certification process should be included in a standard.}</i> <i>{RA_7. Consider adding provisions as follows: 1) The RA must begin operation within one year of certification. The RA must be recertified if it has not begun operation within that time frame; and 2) The process should allow for decertification of a RA in the event of a merger, acquisition, or other reason.}</i>
The OCTF included the certification process in the SAR because the industry requested (during industry workshops) that the certification process be addressed consistently across Regional Boundaries. The only way to ensure that a process be followed consistently is to include the process within the standard. We will ask the industry to confirm that the process should be applied consistently across regional boundaries by being included in the SAR and associated Standard.			
We will ask the industry if there is support to add these requirements (from response #7).			
Lee Gladish CWLP #4	X		Same as answer to #7 <i>{RA_7. Certification of personnel should include the requirement of the "appropriate" certification. IE: There are now multiple credentials, and the RA must have Personnel with RA credentials.}</i>
The SAR will be revised to include specific language to more specifically indicate which system operator credentials are acceptable.			
John Blazekovich Exelon #1, 3, 5, 6			Because Exelon does not see this issue solely as a "core reliability" issue and believe the certification criteria and process should be defined by the appropriate NERC and or NAESB process. We believe it is premature for NERC to define the process at this time.
The criteria contained within the SARs was drafted to support reliability of the interconnected North American grid, not to support business practices. The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.			
Paul M. Cafone PSE&G #1			see my previous comments
Art Giardino PSE&G #1		X	

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William Smith Allegheny #1		X	
Ray Morella First Energy #1		X	
Andrew Wilcox NB Power #1		X	
Alan Johnson Mirant #6		X	
Ed Groce Avista #5		X	
Al DiCaprio MAAC #2		X	
Martin Boisvert, HQ, #1		X	
Stuart Goza TVA #1		X	
Gordon Pietsch Great River Energy #1		X	
George Bartlett Entergy Svcs #1, 3, 5		X	
Sam Jones ERCOT #2		X	
Jim Cyrulewski, ITC #1		X	
Ed Riley CAISO #2		X	
John Stickle AECI #1		X	
Gerald Rheault Manitoba Hydro #1, 3, 5		X	

13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.

Commenter	Comments
Ed Riley CISO	WECC Reliability Coordinator Empowerment agreements may, or may not, come into play here - this is a placeholder for further development if necessary.
Paul Elwing Lakeland Elec #3	SAR should only step in in the absence of Regional Security Process / Reliability Plan. Should also be flexible enough so as not to conflict with State jurisdictional requirements
John Muir Con Ed #1	Coordination between the existing Reliability Coordinator(s) and the new RA(s) needs to be understood and considered during the development of the RA standard.
Linda Campbell for FRCC OC #1, 3,4,5	FRCC requires their own confidentiality agreement in addition to the NERC agreement. In addition, FRCC's Security Process (Reliability Plan) has other requirements for tools, etc. that must be met. Also, NERC can not set a requirement for the RA will preempt any state jurisdictional requirements.
Karl Kohlrus CWLP #5	With the proposed SAR of a single NERC region taking the lead, there are regional differences in the case of MISO.
Please identify these regional differences more specifically.	
Michael Desselle AEP #1, 3, 5, 6	Regional differences should be settled and published as standards by NERC for each Interconnection.
Regional Differences and Interconnection Differences are treated differently. Please reference the Reliability Standards Process Manual pages 20-22. Both Regional Differences and Interconnection Differences need to be identified in the SAR/Standard. Regional Differences are subject to approval by the Ballot Pool that approves the standard.	
John Blazekovich Exelon #1, 3, 5, 6	Issues as a result of Regional differences can be decided through the NERC/NAESB process.
Regional Differences need to be identified as soon as practical, preferably during the SAR drafting stage. The SAR is presented to the NERC/NAESB JIC once the industry has reached consensus on the need for the standard and the scope of the proposed standard. If Regional Differences are included in the SAR they will be presented to the JIC as part of the SAR.	
Paul M. Cafone PSE&G #1	Multiple Regional Differences exist, and all must be reviewed.
Please identify these regional differences more specifically.	
Tony Jankowski We Energies # 3,4, 5	None -- All organization certifications need to be consistent.
Alan Boesch NBPP #1	Regional differences should be specified in the standards used for certification.
Gerald Rheault Manitoba Hydro !1, 3, 5	Manitoba Hydro is not aware of any Regional Differences which need to be addressed.

14. Other Comments on this Certification SAR:

Commenter	Comments
Michael Desselle AEP #1, 3, 5, 6	<ol style="list-style-type: none"> 1. Each NERC Region should establish an audit process, similar to the Control Area audits and performance reporting performed today, which would verify a Balancing (<i>Reliability</i>) Authority's compliance to NERC standards. Violations should result in monetary fines. 2. These comments are based on the assumption that PJM and MISO will be the RA, IA and BA for the AEP transmission system. 3. Newly hired employees for the BA should be allowed to work under the NERC certified supervisors until such new employees have a chance to get certified. 4. Grandfathering of existing BA.
<p>During the workshops held by the OCTF, there were very clear directions to develop a process that was applied evenly from Region to Region. Although there will be a uniform procedure for certifying an entity, the Standard process does allow for Regional differences to be included in the Standard. These differences have to be identified during the SAR and Standard development process. Personnel certification issues have been forwarded to the Personnel Subcommittee who has governance over the System Operator Certification program. Grandfathering will not be a consideration in the certification process.</p>	
Tom Pruitt (Duke Energy Grid) #1	<p>The RA will have limited, if any, knowledge of physical or cyber security incidents unless those incidents impact reliability. The RA should have the responsibility for reporting of incidents which do not impact reliability. We suggest that the phrase "relative to reliability" be added to the end of the sentence under the Security (7.1) criterion.</p>
<p>Comments will be considered in the SAR revisions.</p>	
Terri M. Kuehneman SRP #1,3	<p>The Certification Process should include making changes to the TDF for the WECC Region.</p>
<p>Based on follow-up inquires the procedure has been modified to encompass the concerns expressed.</p>	
Gerald Rheault Manitoba Hydro !1, 3, 5	<p>Manitoba Hydro believes that the "Purpose /Industry Need" section of the SAR is poorly written. The purpose should be stated as "To establish an appropriate certification process to ensure that the Balancing Authority is capable of performing its required functions". The Brief Description should focus on the content of the Standard; the criteria related to processes, procedures, tools and agreements required to ensure that the reliability related functions of the Balancing Authority can be carried out.</p>
<p>Comments will be considered during the revision process of the SAR after seeking additional industry input.</p>	
Martin Boisvert, HQ, #1	<p>Should refer to Reliability Coordinator. Those who should be certified are the individuals and not the function.</p>
<p>The industry consensus from the comments received identifies that certification of the RA is a reliability issue that NERC should continue to pursue.</p>	

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Ken Githens Allegheny #5	Any certification team member should not be an employee of the organization being certified.
As envisioned, this would not be allowed.	
Barry Gee National Grid #1 David Little Nova Scotia #1,3,5 A. Ralf Rufrano NYPA #1 Guy Zito NPCC #2	Coordination between the existing Reliability Coordinator(s) and the new RA(s) needs to be understood and considered during the development of the RA standard.
It is envisioned that the current work of the FMRTG will further define the function of the Reliability Authority.	
William Smith Allegheny #1	In order to promote consistency throughout NERC, the Review Team should use a NERC Standardized "evaluation review template".
As envisioned, all review teams across all Regions would use the same certification procedures and templates.	
Paul M. Cafone Public Service Electric and Gas Company	This entire effort is too much too soon. RTOs are still seeking FERC Approval. Regions are in flux as Their Footprint should follow the RTOs. SMD is still not settled. There are simply too many open Issues that must be addressed before a "Standard" for an Reliability Authority can be created. We have the cart before the Horse.
The industry consensus from the comments received identifies that certification of the RA is a reliability issue that NERC should continue to pursue.	
Art Giardino PSE&G #1	Cancel it.
The industry consensus from the comments received identifies that certification of the RA is a reliability issue that NERC should continue to pursue.	
Paul Elwing Lakeland Elec #3	SAR should be put on hold until Functional Model completed & Certification Processes should not be included in the SAR
The changes to the Functional Model are not expected to significantly change the required 'capabilities' contained within the draft SARs. Even though we may need to make some minor adjustments to the certification requirements as a result of the FMRTG, there seems to be industry consensus on the need to make a start in developing these certification standards.	
The OCTF included the certification process in the SAR because the industry requested (during industry workshops) that the certification process be addressed consistently across Regional Boundaries. The only way to ensure that a process be followed consistently is to include the process within the standard. We will ask the industry to confirm that the process should be applied consistently across regional boundaries by being included in the SAR and associated Standard.	

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<p>Alan Johnson Mirant #6</p>	<p>Generally, this SAR is well written. However, given that the FMRTG continues to discuss the roles of the various functions, it may be premature to issue this SAR.</p>
<p>The changes to the Functional Model are not expected to significantly change the required 'capabilities' contained within the draft SARs. Even though we may need to make some minor adjustments to the certification requirements as a result of the FMRTG, there seems to be industry consensus on the need to make a start in developing these certification standards.</p>	
<p>Linda Campbell for FRCC OC #1, 3,4,5</p>	<p>The process for certification should be removed completely.</p>
<p>The OCTF that drafted the SAR asked the advice of NERC's legal counsel regarding whether to include the certification process within the Certification Standards. The response was that if a process/procedure must be followed by all entities in the same way, then the process/procedure must be included within the standard. The 'process' does not need to be included in the SAR, but does need to be included in the associated standard. The OCTF felt that without presenting the process, the industry would not have the information needed to understand how the process will be administered. During the workshops held by the OCTF, there were very clear directions from industry participants to develop a process that was applied consistently from Region to Region.</p>	
<p>Roman Carter for Tony Reed Southern Co en and En Mkt #1, 3, 5, 6</p>	<p>SAR Scope and Detail- Much detail is included in the SAR that should be reserved for development within the standard itself. For example, the SAR should only outline key elements that should be included in the certification process, and should not try to define specific steps. Otherwise, provisions should be made in the SAR to permit revision to the certification process and criteria during development fo the standard itself.</p>
<p>This SAR includes some details that aren't in other SARs – this is because of some specific requests made by industry participants during Workshops. The standard drafting team will add even more specific requirements, measures and descriptions of expected performance/outcomes.</p> <p>If the need for a modification is identified during the SAR Drafting stage, the SAR DT can make modifications to the SAR. The scope of each standard must be defined within a SAR and once that SAR is approved to go to the standard drafting stage, additional changes to the scope of the SAR cannot be made without re-posting the SAR. Standards Drafting Teams are limited to developing details for requirements that have already been identified in the SAR. Once the standard is approved, modifications may be initiated to the standard by submitting a new SAR that indicates what changes are needed. The process for updating an approved standard is addressed in the RSPM.</p>	
<p>Tony Jankowski We Energies # 3, 4, 5 MIPS & LTIS</p>	<p>Throughout the text the SAR implies that the Region has authority for conducting the certification process, up to and including dispute resolution. This conflicts with your question asking who should conduct the certification and the concept at NERC as the certification authority.</p>
<p>The consensus of the comments is that all affected Regions should be involved, but that one of those Regions should take the lead in coordinating the effort and the certification decision should be a collective effort made equally by all team members. We will ask the industry if this is accurate. The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p>	

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<p>Roger Green SOCO Gen #4</p>	<p>The SAR should establish the minimum acceptable certification processes and criteria that are needed to ensure reliability requirements are met. However, as the standard itself is being developed, the industry may identify changes that would enhance the process and/or criteria. Therefore, provisions should be made in the SAR to permit enhancements to the certification process and criteria during development of the standard itself. One approach would be for the SAR to only outline the key minimum elements that should be included in the certification process, and not try to define specific steps.</p>
<p>If the need for a modification is identified during the SAR Drafting stage, the SAR DT can make modifications to the SAR. The scope of each standard must be defined within a SAR and once that SAR is approved to go to the standard drafting stage, additional changes to the scope of the SAR cannot be made without re-posting the SAR. Standards Drafting Teams are limited to developing details for requirements that have already been identified in the SAR. Once the standard is approved, modifications may be initiated to the standard by submitting a new SAR that indicates what changes are needed. The process for updating an approved standard is addressed in the RSPM.</p>	
<p>John Blazekovich Exelon #1, 3, 5, 6</p>	<p>Exelon feels that the series of "certification" SARs should be submitted to the NERC/NAESB JIC process. Once in the NERC/NAESB JIC process, we ask that the issue of overlapping responsibilities (as defined in the NERC Functional Model) among balancing authorities, interchange authorities, transmission owners and RTOs be addressed.</p>
<p>The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.</p>	
<p>William Reinke SERC #2</p>	<p>I believe the certification process is inappropriate for a standard. Therefore, I urge Mr Burrows and the OCTF to withdraw this request. The certification process is a business practice.</p>
<p>The OCTF included the certification process in the SAR because the industry requested (during industry workshops) that the certification process be addressed consistently across Regional Boundaries. The only way to ensure that a process be followed consistently is to include the process within the standard. We will ask the industry to confirm that the process should be applied consistently across regional boundaries by being included in the SAR and associated Standard.</p>	

15. When should re-certification occur? Check all that apply.

Industry consensus indicates a need for re-certification for a change to the footprint, repeated non-compliance, and flagrant violations. There does not appear to be an industry consensus to support re-certification on a periodic basis. Comments received opposed to periodic re-certification based their justification on performance adherence to the Compliance and Enforcement Program. The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification.

Commenter	Periodic	Chg Footprnt	Rep Non comp	Flagr Violat	Comments
Ken Githens Allegheny #5	X	X	X	X	Periodic recertification time intervals should be extended if other item are included.
Jim Cyrulewski, International Trans Company #1	X	X	X	X	For second bullet, change in footprint is questionable for recertification. For footprint change, believe this needs to be addressed as new certification.
Ed Riley CISO	X	X	X	X	All of the above are appropriate triggers for review/recertification.
Roman Carter for Tony Reed Southern Co en and En Mkt #1, 3, 5, 6	X	X	X	X	Periodic re-certification should take place no sooner than every 3 years.
Tom Pruitt (Duke Energy Grid) #1	X	X	X	X	See comments on question 16 on TOP comment form. <i>{TOP_16. Periodicity should be every 5 years or for cause. Significant changes in corporate organization should not be a trigger for re-certification unless accompanied by significant changes in footprint and/or operation.}</i>
Kathleen Goodman ISO New England #2	X	X	X	X	Periodic should be something like 5 years.
Tony Jankowski We Energies # 3, 4, 5	X	X	X	X	Recertification due to repetitive and /or flagrant non-compliance should only be initiated upon decertification by the Compliance and Monitoring Program.

<p>Industry consensus indicates a need for re-certification for a change to the footprint, repeated non-compliance, and flagrant violations. There does not appear to an industry consensus to support re-certification on a periodic basis. Comments received opposed to periodic re-certification based their justification on performance adherence to the Compliance and Enforcement Program. The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification.</p>					
Alan Boesch NBPP #1	X	X	X	X	Significant change in applicable standards.
Alan Johnson Mirant #6	X	X	X	X	With periodic defined at every 5 - 10 years.
MIPS & LTIS	X	X			Recertification due to repetitive and/or flagrant non-compliance should only be initiated upon decertification by the Compliance and Monitoring Program.
<p>Industry consensus indicates a need for re-certification for a change to the footprint, repeated non-compliance, and flagrant violations. There does not appear to an industry consensus to support re-certification on a periodic basis. Comments received opposed to periodic re-certification based their justification on performance adherence to the Compliance and Enforcement Program. The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification.</p>					
George Bartlett Entergy Svcs #1, 3, 5	X			X	Reliability Authorities should be re-certified on a periodic basis or when flagrant violations of Reliability Standards occur in that reliability region. Re-certification of control areas should be addressed in the Balancing Authority certification, not the Reliability Authority standard.
John Stickley AECI #1		X	X	X	Re-certification should only be necessary when the Balancing Authority's ability to perform its functions according to applicable standards (again, note that no standards are currently set) is in question, be that due to changes within the Balancing Authority itself or due to poor performance by the Balancing Authority in meeting applicable standards.
<p>Industry consensus indicates a need for re-certification for a change to the footprint, repeated non-compliance, and flagrant violations. There does not appear to an industry consensus to support re-certification on a periodic basis. Comments received opposed to periodic re-certification based their justification on performance adherence to the Compliance and Enforcement Program. The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification.</p>					
Gerald Rheault Manitoba		X	X	X	There is no purpose in performing a re-certification on a

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Hydro !1, 3, 5					Functional Authority which is operating satisfactorily. Other Standards which are presently being developed will periodically review whether this Functional Authority is properly performing the tasks required of it. This will be done through a self-certification review or a Reliability Audit which are performed on a yearly and three year basis respectively. If these reviews result in non compliance then a re-certification review may be required.
<p>Industry consensus indicates a need for re-certification for a change to the footprint, repeated non-compliance, and flagrant violations. There does not appear to an industry consensus to support re-certification on a periodic basis. Comments received opposed to periodic re-certification based their justification on performance adherence to the Compliance and Enforcement Program. The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification. Industry consensus indicates a need for re-certification for a change to the footprint, repeated non-compliance, and flagrant violations. There does not appear to an industry consensus to support re-certification on a periodic basis. Comments received opposed to periodic re-certification based their justification on performance adherence to the Compliance and Enforcement Program. The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification.</p>					
William Reinke SERC #2		X	X	X	On the assumption that the RA will be audited periodically, the audit process can serve as a surrogate for a periodic recertification. In the case of an RA, I would offer that an investigation and recertification process be initiated if/when an event occurs in its area of responsibility that involves interruption of all or a portion of the bulk electric system.
<p>Industry consensus indicates a need for re-certification for a change to the footprint, repeated non-compliance, and flagrant violations. There does not appear to an industry consensus to support re-certification on a periodic basis. Comments received opposed to periodic re-certification based their justification on performance adherence to the Compliance and Enforcement Program. The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification.</p>					
Linda Campbell for FRCC OC #1, 3,4,5					FRCC does not believe a re-certification process is necessary. The BA will be monitored through the compliance measurements included in the standard. A separate re-certification process is an unnecessary and costly make-work effort. Having said that, we do believe that a process for de-certification should be developed to address repetitive non-compliance or flagrant violation of reliability standards.

<p>Industry consensus indicates a need for re-certification for a change to the footprint, repeated non-compliance, and flagrant violations. There does not appear to an industry consensus to support re-certification on a periodic basis. Comments received opposed to periodic re-certification based their justification on performance adherence to the Compliance and Enforcement Program. The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification.</p>					
John Blazekovich Exelon #1, 3, 5, 6					Because Exelon does not see this issue solely as a "core reliability" issue and believe the certification criteria and process should be defined by the appropriate NERC and or NAESB process. We believe it is premature for NERC to define the process at this time.
<p>The industry consensus from the comments received identifies that certification of the RA is a reliability issue that NERC should continue to pursue.</p>					
Mike Miller Southern Co					Periodically should be every 3 years
Art Giardino PSE&G #1					None, this should not exist as a NERC Certification.
<p>The industry consensus from the comments received identifies that certification of the RA is a reliability issue that NERC should continue to pursue.</p>					
Peter Burke [submitting responses for ATC's Alan Staats and Bobbi Welch] ATC #1	X	X	X	X	
Al DiCaprio MAAC #2	X	X	X	X	
Karl Kohlrus CWLP #5	X	X	X	X	
William Smith Allegheny #1	X	X	X	X	
Sam Jones ERCOT #2	X	X	X	X	
Paul M. Cafone Public Service Electric and Gas Company	X	X	X	X	
Martin Boisvert, HQ, #1	X	X	X	X	
Stuart Goza TVA #1	X	X	X	X	

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Ray Morella First Energy #1	X	X		X	
Lee Gladish CWLP #4	X	X	X	X	
Roger Green SOCO Gen #4	X	X	X	X	
Terri M. Kuehneman SRP #1,3		X	X	X	
Gordon Pietsch Great River Energy #1		X	X	X	
John Muir Con Ed #1		X	X	X	
Barry Gee National Grid #1		X	X	X	
David Little Nova Scotia #1,3,5		X	X	X	
A. Ralf Rufrano NYPA #1		X	X	X	
Guy Zito NPCC #2		X	X	X	
Michael Desselle AEP #1, 3, 5, 6		X	X		
Andrew Wilcox NB Power #1			X	X	
Ed Groce Avista #5			X		
Paul Elwing Lakeland Elec #3				X	