

Reliability Coordinator Certification Standards. Draft 2 Comments

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Reliability Coordinator Certification – Certification Standard?

General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.

Commenter	Yes	No	Comment	Response
Total:				
Alberta Electric System Operators Anita Lee	X		It is not clear from the standard whether this is a one-time requirement (initial certification) or whether this is the start of some repetitive requirement.	It is a one time certification.
Entergy Services Ed Davis		X	There does not seem to be a requirement that in order to be certified the TOP must demonstrate how it adheres to all the NERC cyber security standards. Cyber Security references in this existing certification document are limited to Loss of Control Center and Emergencies.	The standard has been modified to address your comment.
Southern Company – Transmission Marc M. Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Vilkinsalo Jim Griffith Wade Pugh Phil Winston – GA Power Co.		X	Purpose – Is the -NERC Certification Process for Reliability Coordinators- a defined term or procedure that exists independent of these standards? We could not find it in the Glossary nor in any of the existing standards and cannot recall seeing it defined anywhere. Please provide reference. If you mean the existing NERC Control Area Certification Process, then we think that it should be appropriately modified and posted either with the standards or as an attachment. See also ORG-020-1, R2. ORG-020-1, R1 – Southern Company - Transmission previously commented that the certification standards should -...reference the various standards (approved NERC Reliability Standards) that truly apply and not list each specific task that is required. Having a list may lead to the standards being changed at different times and the two getting out of synch with each other.- The Standard Drafting Team replied that --The Reliability Standards process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard.-- We can not find the source of this directive and request that the drafting team provide the specific reference which forbids referencing the NERC Reliability Standards from within the Organizational Certification Standards. However, even if this is appropriate for NERC Reliability Standards in general, it does not appear to be appropriate for Organizational Certification Standards which appear to be fundamentally different from other NERC Reliability Standards. We request that the Standard Drafting Team, perhaps with the support of NERC Vice President of Standards, reconsider their position on this issue and make all efforts to avoid developing new reliability standards within the Organizational Certification Standards that potentially conflict with the NERC Reliability Standards.	<p>The CCC is responsible for developing the certification process. The name of this document has recently been changed to the Organization Registration and Certification Manual. The document is expected to be available on the NERC website. The SDT has made this name change in the most recent standard modifications. The working draft of the document is available in the OCWG meeting minutes.</p> <p>The Standards have been modified to include references to applicable Version 0 standards.</p>

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			<p>Note that the Standard Drafting Team violates its own direction concerning referencing other NERC standards from within a standard in ORG-020-1, R1 when it specifically references the other TOP Organizational Certification Standards (ORG-021-1, ORG-022-1, etc., although R1 doesn't list their numbers we have done so below in parentheses for your convenience). How can you reference these standards within ORG-020-1 when you can not reference other NERC Reliability Standards? Per your reply above, you can't and these references should be removed, thus eliminating ORG-020-1,R1 entirely. This is an obvious inconsistency. In addition, no such guidance was issued to the Revision 0 Standards Drafting Team and references to other standards were utilized in that process.</p> <p>The specific standards referenced in ORG-020-1, R1 are :</p> <ul style="list-style-type: none"> - Reliability Coordinator Certification — Certification (ORG-020-1) - Reliability Coordinator Certification — Agreements (ORG-021-1) - Reliability Coordinator Certification — Personnel (ORG-022-1) - Reliability Coordinator Certification — Data Acquisition and Monitoring (ORG-023-1) - Reliability Coordinator Certification — System Analysis (ORG-024-1) - Reliability Coordinator Certification — Emergency Operations (ORG-025-1) - Transmission Operator Certification — Loss of Control Center Functionality (ORG-026-1) - Transmission Operator Certification — Restoration (ORG-027-1) <p>ORG-020-1, R3 – Similar language is found in IRO-001-0, R1. We probably need to be consistent for all entities and put it in one set of standards or the other (Organizational Certification Standards or Reliability Standards), but not both. Since this is something that can be done after initial certification, it should probably be in the Reliability Standards and referenced by the Organizational Certification Standards.</p> <p>ORG-020-1, R4 – This is a reference to the NERC Reliability Standards generically. If they can be referenced generically, why can they not be referenced specifically?</p> <p>ORG-020-1, R5 – Seems redundant. Why do you need a requirement saying that certification will be conditional on another (single) requirement?</p>	
Southeastern Power Administration		X	As these standards have been refined, SEPA has had	The Standards have been modified to include references to

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Carter B. Edge		<p>increasing concerns with the redundancy of Reliability Standards Requirements in multiple standards. Duplication of Requirements and "one-time" certification Measures will lead to confusion, dilute recognition of Requirements, weaken the standards process and potentially introduce synchronization issues between the Requirements, across the different standards in which they occur.</p>	applicable Version 0 standards.
<p>FRCC Eric Senkowicz – FRCC Linda Campbell – FRCC Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Cooperative. Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission.</p>		<p>The FRCC has a common comment for all three groups of certification standards (TOP, BA and RC Certification). As these standards have been refined, the FRCC has had increasing concerns with the redundancy of Reliability Standards Requirements in multiple standards. Duplication of Requirements and "one-time" certification Measures will lead to confusion, dilute recognition of Requirements, weaken the standards process and potentially introduce synchronization issues between the Requirements, across the different standards in which they occur.</p> <p>In an effort to clarify the overall standards process, reduce documentation and focus the compliance process the FRCC suggests to replace these eight standards with a single certification standard which addresses the certification process only, as defined in the Standard Authorization Request (SAR) which initiated these standards. This single standard would only include the unique requirements of the certification process (as described in the SAR) and would address the specific Reliability Coordinator requirements by global or specific reference. This would eliminate redundancy, eliminate the need for additional synchronization controls and maintain the integrity of the current RC applicable Requirements. This would also help focus the compliance elements rather than weaken and dilute them.</p> <p>There is a Requirements database which currently exists, that sorts applicable requirements applicable to each entity. The end product of a single certification process only standard would be that RCs going through the certification process would come out of it with a focused and clearer understanding of the actual Reliability Standards and associated Requirements for which they will be required to comply with on a day-to-day basis.</p>	<p>The Standard has been modified to include references to version 0 standards.</p> <p>The certification process was removed from the standard and supported by the industry. The CCC is currently responsible for the process.</p> <p>Although the Version 0 Matrix of Requirements by Function spreadsheet may be a useful resource, not all of the requirements included in Version 0 standards will be included in the elements of certification.</p>
Hydro-Quebec TransEnergie Roger Champagne	X		
<p>Operating Reliability Working Group Robert Rhodes – SPP Mike Anderson – AEP Bob Cochran – SPS</p>	X		

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Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI				
Independent Electricity System Operator, Ontario Ron Falsetti		X	It is unclear from the standard whether this is a one-time requirement (initial certification) or whether this is the start of some repetitive requirement. The standard should be clear that this is for initial certification and that the RC standards in force at any given time would guide the ongoing requirements with the RRO confirmation of the RC compliance with these standards through its triennial review. Underlying/ supporting documentation collected by the RRO during the certification process, should be retained only for a specified period of time..	The certification standards are intended to be a one-time process. On-going audits such as readiness or compliance have their own data retention requirements.
ISO New England Kathleen Goodman	X			
Midwest Reliability Organization Rober Coish – MRO Terry Bilke – MISO Dennis Florum – Linoln Electric Sys. Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members	X			
Manitoba Hydro Robert Coish	X			
Center Point Energy John Jonte Dennis Caufield	X			
MAAC John Horakh	X			
CP9, Reliability Standards Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power Authority Roger Champagne – TransEnergie Peter Lebro – National Grid US Kathleen Goodman – ISO NE Greg Campoli – NY ISO David Little – Nova Scotia Power Khaqan Khan – The IESO (Ontario)	X			

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Hydro One Networks Al Adamson – NY State Reliability Coun.				
Tennessee Valley Authority Kathleen A. Davis Stuart Goza	X		none	

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2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Reliability Coordinator Certification – Agreements standard?

General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.

Commenter	Yes	No	Comment	Response
Total:				
Alberta Electric System Operators Anita Lee	X		For each related element in Requirements, we suggest to replace the word "commitment" with "obligation". Obligation is a stronger word.	The SDT feels that the two terms are synonymous and does not see a need to change the wording.
Entergy Services Ed Davis	X		There does not seem to be a requirement that in order to be certified the TOP must demonstrate how it adheres to all the NERC cyber security standards. Cyber Security references in this existing certification document are limited to Loss of Control Center and Emergencies.	The standard has been modified to address your comment.
Southern Company – Transmission Marc M. Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Vilkinsalo Jim Griffith Wade Pugh Phil Winston – GA Power Co.		X	We understand the SAC is considering including a field test/readiness audit-type process between balloting of the standard and approval by the Board of Trustees. This would ensure the entity seeking certification would possess the tools, personnel, training, etc., necessary for adequately performing the function. We recommend including this process in the standard. There is no such document as the NERC SoC. NERC has a Data Confidentiality Agreement and a NERC Reliability Coordinator Standard of Conduct. If the reference is to the NERC Reliability Coordinator Standard of Conduct, please clarify. ORG-021-1 RCs in SERC do not have contractual arrangements directly with IPPs within their Reliability Areas. The arrangements are through the Transmission Owner. Should the RC require data, the request is made to the Transmission owner, who obtains the necessary data. Please re-write this section to consider such arrangements. ORG-021-1, R3 – The agreements listed in this requirement are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference agreements required to meet the functional requirements of the appropriate NERC Reliability Standards. In addition, some, if not most, of the entities referred to by this requirement are not well defined in the existing Functional Model. Nor has there been any effort to register these entities in the regions. It would seem more useful to require agreements with functional requirements with the proper entities rather than depend upon Functional Model entities that have not been defined or that do not yet exist. ORG-021-1 R3.2.6 does state that the BA will supply notice of interchange schedule interruptions, which is good, and this needs to be stated in the BA certification.	Field testing will occur prior to the standards going to ballot. The Standard of Conduct could be the current RC Standard of Conduct or any subsequent document that is developed. ORG-21 – The standard has been modified to address your concern with the IPP data acquisition. The standards have been modified to include references to Version 0 standards. These certification standards are only referencing functions that are already identified in Version 0 standards. Although the identification of the entities performing these functions is necessary, entity registration is beyond the scope of the drafting team.

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<p>Southeastern Power Administration Carter B. Edge</p>		X	<p>We understand the SAC is considering including a field test/readiness audit-type process between balloting of the standard and approval by the Board of Trustees. This would ensure the entity seeking certification would possess the tools, personnel, training, etc., necessary for adequately performing the function. We recommend including this process in the standard.</p> <p>ORG-021-1 RCs in SERC do not have contractual arrangements directly with IPPs within their Reliability Areas. The arrangements are through the Transmission Owner. Should the RC require data, the request is made to the Transmission owner, who obtains the necessary data. Please re-write this section to consider such arrangements.</p> <p>ORG-021-1, R3 – The agreements listed in this requirement are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference agreements required to meet the functional requirements of the appropriate NERC Reliability Standards. In addition, some, if not most, of the entities referred to by this requirement are not well defined in the existing Functional Model. Nor has there been any effort to register these entities in the regions. It would seem more useful to require agreements with functional requirements with the proper entities rather than depend upon Functional Model entities that have not been defined or that do not yet exist.</p> <p>ORG-021-1 R3.2.6 does state that the BA will supply notice of interchange schedule interruptions, which is good, and this needs to be stated in the BA certification.</p>	<p>Field testing will occur prior to the standards going to ballot.</p> <p>The Standard of Conduct could be the current RC Standard of Conduct or any subsequent document that is developed.</p> <p>ORG-21 – The standard has been modified to address your concern with the IPP data acquisition.</p> <p>The standards have been modified to include references to Version 0 standards.</p> <p>These certification standards are only referencing functions that are already identified in Version 0 standards. Although the identification of the entities performing these functions is necessary, entity registration is beyond the scope of the drafting team.</p>
<p>FRCC Eric Senkowicz – FRCC Linda Campbell – FRCC Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Cooperative. Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission.</p>		X	<p>See comment to number 1.</p>	<p>See response to number 1.</p>
<p>Hydro-Quebec TransEnergie Roger Champagne</p>	X			
<p>Operating Reliability Working Group Robert Rhodes – SPP Mike Anderson – AEP Bob Cochran – SPS</p>		X	<p>With the replacement of 'adjacent' with 'other' in R3 in this draft, the requirement now implies there are multiple Reliability Coordinators for a defined Reliability Coordinator Area. R3 should be reworded to say</p>	<p>The modifications made to R3 should address your concern.</p>

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Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI			"...Balancing Authorities and Transmission Planners for the defined Reliability Coordinator Area and other Reliability Coordinators that addresses: This is consistent with the usage in R3.1.	
Independent Electricity System Operator, Ontario Ron Falsetti		X	There is an existing requirement for RCs to process daily integrated operational plans (which is in the functional model, but not in the standards). While the items in the functional model are useful to verify the RC has the processes needed to do the job, the functional model tasks shouldn't form a go-no go situation (as long as the general intent is met). For each related element in Requirements, we suggest to replace the word "commitment" with "obligation". Obligation is a stronger word.	The BIOP has been removed from the standard in the SDT's effort to reference applicable Version 0 standards. The SDT does not identify any additional benefit to changing the wording for commitment.
ISO New England Kathleen Goodman	X			
Midwest Reliability Organization Rober Coish – MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric Sys. Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members	X			
Manitoba Hydro Robert Coish	X			
Center Point Energy John Jonte Dennis Caufield	X		If one entity has multiple reliability roles(i.e. an RC is also the BA and /or TO) it's internal documentation must clearly define it's own authority & responsibilities in conjunction with the agreements with other entities. Each entities responsibilities (including delegated responsibilities) must be clearly defined, especially concerning emergency operations, curtailments and load shedding.	
MAAC John Horakh	X			
CP9, Reliability Standards Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power Authority Roger Champagne – TransEnergie Peter Lebro – National Grid US	X			

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Kathleen Goodman – ISO NE Greg Campoli – NY ISO David Little – Nova Scotia Power Khaqan Khan – The IESO (Ontario) Hydro One Networks Al Adamson – NY State Reliability Coun.				
Tennessee Valley Authority Kathleen A. Davis Stuart Goza	X		none	

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3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Reliability Coordinator Certification – Loss of Control Center Functionality?

General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.				
Commenter	Yes	No	Comment	Response
Total:				
Alberta Electric System Operators Anita Lee	X		i). Requirement R1 - outlines that RC shall have procedures, processes, tools or facilities to continue to operate its RC Area under "single occurrence" for each of conditions. This needs to be clarified and revised to state that RC's shall continue to operate for any combination of conditions rather than single occurrence alone Footnote # 1 should be revised as: "Loss of communications is meant to include all "primary" communications other than all associated..."	The SDT has modified the standard to reference the Version 0 EOP-008 standard. This modification should address your concern.
Entergy Services Ed Davis	X			
Southern Company – Transmission Marc M. Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Vilkinsalo Jim Griffith Wade Pugh Phil Winston – GA Power Co.		X	R2.13 RCs do not have the ability to -implement-, but only to -direct- Transmission Operators to implement.	The SDT has modified the standard to reference the Version 0 EOP-008 standard. This modification should address your concern.
Southeastern Power Administration Carter B. Edge		X	R2.13 RCs do not have the ability to -implement-, but only to -direct- Transmission Operators to implement.	The SDT has modified the standard to reference the Version 0 EOP-008 standard. This modification should address your concern.
FRCC Eric Senkowicz – FRCC Linda Campbell – FRCC Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Cooperative. Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission.		X	See comment to number 1.	See response to number 1.
Hydro-Quebec TransEnergie Roger Champagne		X	Please clarify why the approval was stricken from R-2.10 and R-2.11. Also, in R-2.17, what is meant by 'Cyber Security Protocols?'	The SDT has modified the standard to reference the Version 0 EOP-008 standard. This modification should address your concern.
Operating Reliability Working Group Robert Rhodes – SPP		X	Although the SDT made an effort to clarify that loss of only primary systems is the intent in R1, the footnotes are	The SDT has modified the standard to reference the Version 0 EOP-008 standard. This modification should address your

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Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI			still not totally clear that this is the case. For example, Footnote 1 could be reworded to say "Loss of communications is meant to include only primary communications... In R2.14, the Reliability Coordinator is required to have procedures, processes or tools to develop IROLs. In FAC-010-1, R1 (which is out for ballot) the Reliability Coordinator is also required to have a methodology for developing SOLs within its Reliability Coordinator Area. This requirement is not mentioned in this Standard. For consistency, it should be included. Bulk Electric System (BES) is used in R2.16 and is not capitalized even though it is a defined term in the Standards Glossary.	concern.
Independent Electricity System Operator, Ontario Ron Falsetti		X	i). Requirement R1 - outlines that RC shall have procedures, processes, tools or facilities to continue to operate its RC Area under "single occurrence" for each of conditions listed. This needs to be clarified and revised to state that RC's shall continue to operate for any combination of conditions rather than single occurrence alone. ii). The footnote # 1 should be revised to be consistent with the TOP standard to read: "Loss of communications is meant to include all "primary" communications other thanthat associated with SCAD data"	The SDT has modified the standard to reference the Version 0 EOP-008 standard. This modification should address your concern.
ISO New England Kathleen Goodman		X	R-5, R-6, and R-7 all have stricken "and approved." We request clarification on why this wording was stricken and would like the Drafting Team to define who will be approving, if not the RC?	The SDT has modified the standard to reference the Version 0 EOP-008 standard. This modification should address your concern.
Midwest Reliability Organization Rober Coish – MRO Terry Bilke – MISO Dennis Florom – Linoln Electric Sys. Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members	X			
Manitoba Hydro Robert Coish	X			
Center Point Energy John Jonte Dennis Caufield	X			
MAAC	X			

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John Horakh				
CP9, Reliability Standards Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power Authority Roger Champagne – TransEnergie Peter Lebro – National Grid US Kathleen Goodman – ISO NE Greg Campoli – NY ISO David Little – Nova Scotia Power Khaqan Khan – The IESO (Ontario) Hydro One Networks Al Adamson – NY State Reliability Coun.		X	NPCC participating members request clarification on why the approval was stricken from R-2.10 and 11. Also, in 2.17, what is meant by cyber security protocols	The SDT has modified the standard to reference the Version 0 EOP-008 standard. This modification should address your concern.
Tennessee Valley Authority Kathleen A. Davis Stuart Goza	X		none	

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4. Comments related to ORG-022, ORG-023, ORG-024, ORG-025, & ORG-027.

General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.

Commenter	Comment	Response
Alberta Electric System Operators Anita Lee	<p>a). With regards to "Data Acquisition and Monitoring"</p> <p>i) Requirement 1 - "periodicity of transmittal" and "time frame" appear to mean the same thing.</p> <p>ii) Requirement R2- There should be wording about the RC's obligation to monitor for IROLs.</p> <p>iii) Requirement R2.1 - R2.3 need to indicate if this is for "all" generators or for generators "above a certain MW value".</p> <p>iv) Requirement R7.5 - R7.5 needs to add word "schedule"</p> <p>b). With regards to R8, we suggest the following revision " The Reliability coordinator shall have procedures, processes and tools for monitoring other Reliability Coordinators, as agreed upon for purposes of this standard, that includes:...</p> <p>"With regards to "Restoration" Standard: The SDT should consider adding a minimum list of items that need to be included in the RC restoration plan.</p>	<p>i) Periodicity refers to frequency of data while time frame refers to duration.</p> <p>ii) R2 addresses the acquisition while R6-R8 addresses the monitoring.</p> <p>iii) Neither the certification standards nor the Version 0 standards have defined a specific MW parameter. This will be defined by the Reliability Coordinator</p> <p>iv) The drafting team does not agree with adding just the word schedule since the term interchange addresses both scheduled and actual. The SDT has modified the standard to reflect this.</p> <p>b) The SDT has modified the standard to reference the Version 0 and should address your concern.</p> <p>The reference to EOP-006 should address your concern.</p>
Entergy Services Ed Davis	Please modify these Certification Standards to reference specific existing Standards requirements and delete all restatements or rewording of those Standards requirements in these Certification Standards. These Certification Standards should require the RC to prove how it meets the requirements of the existing Standards. It should not be imposing new requirements on the RC, or providing the opportunity for new requirements to be imposed on the RC.	The SDT has modified the standard to reference the Version 0 and should address your concern.
Southern Company – Transmission Marc M. Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Vilkinsalo Jim Griffith Wade Pugh Phil Winston – GA Power Co.	<p>ORG-022-1, R1.1 – This requirements goes into specific detail well beyond that of the currently approved NERC Reliability Standard PER-003-0, which requires certified personnel in R1.1 for -Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System- and in R1.2. -Positions directly responsible for complying with NERC standards-. In our opinion, it is inappropriate to -make up- new personnel certification requirement details in Organizational Certification Standards that are not supported in the appropriate NERC Reliability Standard.</p> <p>ORG-022-1, R2 – This requirement does not appear to support the specific training requirements of NERC Reliability Standard PER-002-0 and is therefore inadequate as the sole training requirement for organizational certification.</p> <p>ORG-023-1, R1, R2 and R4 – The specific details within these requirements are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for Reliability Coordinator data requirements, periodicity and accuracy (see, for example IRO-002-0, R8, R16</p>	<p>The intent of the requirement was to clarify which personnel in an organization had to be certified based on the tasks that they performed.</p> <p>The standard has been modified to reference the Version 0 standard.</p> <p>The SDT has modified the wording and believes that prescheduled is implied in the modification.</p>

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	<p>and R17). ORG-023-1 R2.12 talks about interchange schedules, but the RA needs preschedules also. ORG-024-1, R1 thru R5 – The specific details within these requirements are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for transmission operations (TOP-001-0 thru TOP-008-0) and Reliability Coordinator interaction (IRO-001-0 thru IRO-006-0). ORG-025-1, R1– The specific details within these requirements are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for Emergency Operations (EOP-001-0 thru EOP-008-0).</p>	
<p>Southeastern Power Administration Carter B. Edge</p>	<p>ORG-022-1, R1.1 – This requirements goes into specific detail well beyond that of the currently approved NERC Reliability Standard PER-003-0, which requires certified personnel in R1.1 for -Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System- and in R1.2. -Positions directly responsible for complying with NERC standards-. In our opinion, it is inappropriate to -make up- new personnel certification requirement details in Organizational Certification Standards that are not supported in the appropriate NERC Reliability Standard. ORG-022-1, R2 – This requirement does not appear to support the specific training requirements of NERC Reliability Standard PER-002-0 and is therefore inadequate as the sole training requirement for organizational certification. ORG-023-1, R1, R2 and R4 – The specific details within these requirements are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for Reliability Coordinator data requirements, periodicity and accuracy (see, for example IRO-002-0, R8, R16 and R17). ORG-023-1 R2.12 talks about interchange schedules, but the RA needs preschedules also. ORG-024-1, R1 thru R5 – The specific details within these requirements are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for transmission operations (TOP-001-0 thru TOP-008-0) and Reliability Coordinator interaction (IRO-001-0 thru IRO-006-0). ORG-025-1, R1– The specific details within these requirements are neither complete nor definitive nor can they be. We highly</p>	<p>The intent of the requirement was to clarify which personnel in an organization had to be certified based on the tasks that they performed.</p> <p>The standard has been modified to reference the Version 0 standard.</p> <p>The SDT has modified the wording and believes that prescheduled is implied in the modification.</p>

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	suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for Emergency Operations (EOP-001-0 thru EOP-008-0).	
FRCC Eric Senkowicz – FRCC Linda Campbell – FRCC Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Cooperative. Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission.	See comment to number 1	See response to number 1.
Hydro-Quebec TransEnergie Roger Champagne	In ORG-024, R-5, R-6, and R-7 all have stricken "and approve" Please clarify why this wording was stricken and would like the Drafting Team to define who will be approving ,if not the RC?	The word "approve" was stricken to conform with the RC authority as defined in the Version 0 standards.
Operating Reliability Working Group Robert Rhodes – SPP Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI	In ORG-024-1, R1, the Reliability Coordinator is required to have procedures, processes and tool(s) to develop IROs. In FAC-010-1, R1 (which is out for ballot) the Reliability Coordinator is also required to have a methodology for developing SOLs within its Reliability Coordinator Area. This requirement is not mentioned in this Standard. For consistency, it should be included. Bulk Electric System (BES) is used in ORG-025 and ORG-027 but is not capitalized even though it is a defined term in the Standards Glossary.	The standard has been modified to reference the Version 0 standards and should address your concern. The capitalization has been corrected.
Independent Electricity System Operator, Ontario Ron Falsetti	a). With regards to "Data Acquisition and Monitoring" i) Requirement 1 - "periodicity of transmittal" and "time frame" appear to mean the same thing. ii) Requirement R2- Should include RC's obligation to monitor for IROs as well. iii) Requirement R2.1 - R2.3 need to indicate if this is for "all" generators or only for generators "above a certain MW thershhold". iv) Requirement R7.5 - R7.5 needs to add word "schedule" b). With regards to R8, we suggest the following revision " The Reliability coordinator shall have procedures, processes and tools for monitoring other Reliability Coordinators, as agreed upon for purposes of this standard, that includes:....." c). With regards to "Restoration" Standard, please see the comments below: i). The SDT should consider adding a minimum list of items that need to be included in the RC restoration plan. ii). Requirement R1 has a typo, The last sentence should be revised as: "..... and Transmission Operators operating within its Reliability Coordinator Area and	i) Periodicity refers to frequency of data while time frame refers to duration. ii) R2 addresses the acquisition while R6-R8 addresses the monitoring. iii) Neither the certification standards nor the Version 0 standards have defined a specific MW parameter. This will be defined by the Reliability Coordinator iv) The drafting team does not agree with adding just the word schedule since the term interchange addresses both scheduled and actual. The SDT has modified the standard to reflect this. b) The SDT has modified the standard to reference the Version 0 and should address your concern. c) The reference to EOP-006 should address your concern. The typo has been corrected

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	"with" other Reliability Coordinators"	
ISO New England Kathleen Goodman	R-5, R-6, and R-7 all have stricken "and approved." We request clarification on why this wording was stricken and would like the Drafting Team to define who will be approving, if not the RC?	The word "approve" was stricken to conform with the RC authority as defined in the Version 0 standards.
Midwest Reliability Organization Rober Coish – MRO Terry Bilke – MISO Dennis Florom – Linoln Electric Sys. Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members	Regarding ORG-022, in R2.1 The Reliability Coordinator shall have a training program that addresses the knowledge and competencies required for reliable system operations. Is vague and will be hard to measure.	The standard has been modified to reference the Version 0 standards and should address your concern.
Manitoba Hydro Robert Coish	Regarding ORG-022, in R2.1 The Reliability Coordinator shall have a training program that addresses the knowledge and competencies required for reliable system operations. is vague and will be hard to measure.	The standard has been modified to reference the Version 0 standards and should address your concern.
Center Point Energy John Jonte Dennis Caufied		
MAAC John Horakh	None	
CP9, Reliability Standards Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power Authority Roger Champagne – TransEnergie Peter Lebro – National Grid US Kathleen Goodman – ISO NE Greg Campoli – NY ISO David Little – Nova Scotia Power Khaqan Khan – The IESO (Ontario) Hydro One Netoworks Al Adamson – NY State Reliability Coun.	R-5, R-6, and R-7 all have stricken "and approved". NPCC participating members request clarification on why this was done and who will be approving this.	The word "approve" was stricken to conform with the RC authority as defined in the Version 0 standards.
Tennessee Valley Authority Kathleen A. Davis Stuart Goza	none	

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5. Please identify any elements that should be included in the standards that have not been identified

Commenter	Comment	Response
Alberta Electric System Operators Anita Lee	We have a general concern with regard to the existing NERC Registration Process and the ultimate RC Certification Process. The concern regards the consistency, terminology or the various interpretations within the industry of what constitutes an RC. We believe that clarity shall be established prior to ultimate certification. It is expected that audits will be conducted for these standards. In that case, we suggest that a retention period for any audit records and results be specified.	The registration process is beyond the scope of the drafting team and concerns should be directed to the CCC. Certification is intended to be a one-time. On-going audits will be conducted as part of the compliance or readiness audits programs and have data retention requirements.
Entergy Services Ed Davis	Please modify these Certification Standards to reference specific existing Standards requirements and delete all restatements or rewording of those Standards requirements in these Certification Standards. These Certification Standards should require the RC to prove how it meets the requirements of the existing Standards. It should not be imposing new requirements on the RC, or providing the opportunity for new requirements to be imposed on the RC.	The standard has been modified to reference the Version 0 standards and should address your concern.
Southern Company – Transmission Marc M. Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Vilkinsalo Jim Griffith Wade Pugh Phil Winston – GA Power Co.		
Southeastern Power Administration Carter B. Edge		
FRCC Eric Senkowicz – FRCC Linda Campbell – FRCC Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Cooperative. Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission.	See comment to number 1. Additionally, the FRCC has concerns with several Requirements associated with the Balancing Authority's "Balancing Integrated Operational Plan". The elements of such a plan are provided in an attachment, separate from any standard. This will make Measures and Compliance elements associated with this plan very difficult to define and audit against. Suggest incorporating the "plan" concept into an existing standard or removing the requirement for a plan from the certification standard altogether. If the elements of such a plan are required they should already be in a version zero standard concerning Balancing.	See response to number 1. The BIOP has been removed from the standards.
Hydro-Quebec TransEnergie Roger Champagne	Approvals? See comments on Q3 & Q4	Please see responses to Q3 & Q4.
Operating Reliability Working Group Robert Rhodes – SPP Mike Anderson – AEP		

Reliability Coordinator Certification Standards. Draft 2 Comments

<p>Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI</p>		
<p>Independent Electricity System Operator, Ontario Ron Falsetti</p>	<p>We have a general concern with regard to the existing NERC Registration Process and the ultimate RC Certification Process. The concern regards the consistency, terminology or the various interpretations within the industry of what constitutes an RC. We believe that clarity shall be established prior to ultimate certification. Our understanding is that various issues are under consideration at the Functional Model Working Group and we would ask that guidelines be developed and included in the revised Functional Model and be included in the implementation plan for the RC Certification Standard.</p> <p>It is expected that RRO audits will be conducted for these standards and we suggest that a retention period for any audit records and results be specified.</p>	<p>The registration process is beyond the scope of the drafting team and concerns should be directed to the CCC.</p> <p>Certification is intended to be a one-time. On-going audits will be conducted as part of the compliance or readiness audits programs and have data retention requirements.</p>
<p>ISO New England Kathleen Goodman</p>	<p>Approvals? See comments on 3 & 4.</p>	<p>Please see responses to Q3 & Q4.</p>
<p>Midwest Reliability Organization Rober Coish – MRO Terry Bilke – MISO Dennis Florum – Lincol Electric Sys. Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members</p>	<p>None</p>	
<p>Manitoba Hydro Robert Coish</p>	<p>None</p>	
<p>Center Point Energy John Jonte Dennis Caufield</p>		
<p>MAAC John Horakh</p>	<p>None</p>	
<p>CP9, Reliability Standards Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power Authority Roger Champagne – TransEnergie Peter Lebro – National Grid US</p>	<p>Approvals?</p>	

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Kathleen Goodman – ISO NE Greg Campoli – NY ISO David Little – Nova Scotia Power Khaqan Khan – The IESO (Ontario) Hydro One Networks Al Adamson – NY State Reliability Coun.		
Tennessee Valley Authority Kathleen A. Davis Stuart Goza	none	

Reliability Coordinator Certification Standards. Draft 2 Comments

6. Please identify any regional differences that should be included in the standards.

Commenter	Comment	Response
Alberta Electric System Operators Anita Lee		
Entergy Services Ed Davis	Please modify these Certification Standards to reference specific existing Standards requirements and delete all restatements or rewording of those Standards requirements in these Certification Standards. These Certification Standards should require the RC to prove how it meets the requirements of the existing Standards. It should not be imposing new requirements on the RC, or providing the opportunity for new requirements to be imposed on the RC.	The standard has been modified to reference the Version 0 standards and should address your concern.
Southern Company – Transmission Marc M. Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Vilkinsalo Jim Griffith Wade Pugh Phil Winston – GA Power Co.		
Southeastern Power Administration Carter B. Edge		
FRCC Eric Senkowicz – FRCC Linda Campbell – FRCC Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Cooperative. Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission.		
Hydro-Quebec TransEnergie Roger Champagne		
Operating Reliability Working Group Robert Rhodes – SPP Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI		
Independent Electricity System Operator,		

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Ontario Ron Falsetti		
ISO New England Kathleen Goodman		
Midwest Reliability Organization Rober Coish – MRO Terry Bilke – MISO Dennis Florom – Linoln Electric Sys. Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members	None	
Manitoba Hydro Robert Coish	None	
Center Point Energy John Jonte Dennis Caufiled	CenterPoint Energy differs to ERCOT to comment on regional differences.	
MAAC John Horakh	None	
CP9, Reliability Standards Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power Authority Roger Champagne – TransEnergie Peter Lebro – National Grid US Kathleen Goodman – ISO NE Greg Campoli – NY ISO David Little – Nova Scotia Power Khaqan Khan – The IESO (Ontario) Hydro One Networks Al Adamson – NY State Reliability Coun.	Approvals?	
Tennessee Valley Authority Kathleen A. Davis Stuart Goza	none	

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7. Do you agree with the proposed implementation plan?

Commenter	Yes	No	Comment	Response
Total:				
Alberta Electric System Operators Anita Lee	X		The implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the FM related entities are either fully registered or certified. Moreover, these entities (such as GOP, DP, etc.) need to be clearly defined and registered/certified.	These certification standards are only referencing functions that are already identified in Version 0 standards. Although the identification of the entities performing these functions is necessary, entity registration is beyond the scope of the drafting team.
Entergy Services Ed Davis	X			
Southern Company – Transmission Marc M. Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Vilkinsalo Jim Griffith Wade Pugh Phil Winston – GA Power Co.	X			
Southeastern Power Administration Carter B. Edge	X			
FRCC Eric Senkowicz – FRCC Linda Campbell – FRCC Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Cooperative. Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission.		X	See comment to number 1	See response to number 1.
Hydro-Quebec TransEnergie Roger Champagne	X			
Operating Reliability Working Group Robert Rhodes – SPP Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI	X			
Independent Electricity System Operator, Ontario	X		The implementation and application of this standard in terms of coordination with other Functional Model related	These certification standards are only referencing functions that are already identified in Version 0 standards. Although

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Ron Falsetti			entities and should allow for a transition period until all the FM related	the identification of the entities performing these functions is necessary, entity registration is beyond the scope of the drafting team.
ISO New England Kathleen Goodman	X			
Midwest Reliability Organization Rober Coish – MRO Terry Bilke – MISO Dennis Florom – Linoln Electric Sys. Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members	X			
Manitoba Hydro Robert Coish	X			
Center Point Energy John Jonte Dennis Caufled	X			
MAAC John Horakh		X	The process looks OK, but the first sentence in Item # 7 (Control Area Certification for New Control Areas) should be reworded as follows for clarity. (1) Delete *after 4/1/2005* (2) After *continue*, add *using the existing control area certification process* (3) Delete *approved* and replace with *implemented, April 1, 2006.*	The implementation plan will be revised.
CP9, Reliability Standards Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power Authority Roger Champagne – TransEnergie Peter Lebro – National Grid US Kathleen Goodman – ISO NE Greg Campoli – NY ISO David Little – Nova Scotia Power Khaqan Khan – The IESO (Ontario) Hydro One Netoworks Al Adamson – NY State Reliability Coun.	X			
Tennessee Valley Authority Kathleen A. Davis Stuart Goza	X		none	

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8. The Drafting Team believes that the RC Certification standards are ready for ballot. Do you support this position?

General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.

Commenter	Yes	No	Comment	Response
Total:				
Alberta Electric System Operators Anita Lee		X	Once our above comments are incorporated then we would consider these ready for balloting.	The SDT has made modifications to the standards in an attempt to address your comments.
Entergy Services Ed Davis		X	Entergy suggests this standard will not be ready for balloting until the cyber security requirements are added. There does not seem to be a requirement that in order to be certified the TOP must demonstrate how it adheres to all the NERC cyber security standards. Cyber Security references in this existing certification document are limited to Loss of Control Center and Emergencies. We also suggest all specific requirements be deleted from these certification standards. RC's should show how they meet the requirements in the Standards, not how they meet the requirements of these certification standards which may not be the same as the Standards.	The SDT has added elements related to Cyber Security and has referenced Version 0 standards in an attempt to address your comments.
Southern Company – Transmission Marc M. Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Vilkinsalo Jim Griffith Wade Pugh Phil Winston – GA Power Co.		X	It should be pointed out during the V-0 standard development process and in the subsequent Version 1 standards development process, and on many other drafting teams, the drafting teams were instructed not to place duplicated requirements in two different standards. The appropriate procedure was to include the requirement in one standard and reference it in the other standard to prevent mistakenly updating it in one standard but not in the other as changes are required. We understand that the Certification drafting team has received different guidance which does not allow -referencing- of other standards. We feel this is a mistake and will cause potential problems with the standards themselves, and possibly jeopardizing reliability. We request that the drafting team provide the specific reference or source of the directives which forbids referencing the NERC Reliability Standards from within the Organizational Certification Standards. We believe that directive to be incorrect. This -no reference- directive appears to be particularly inappropriate for Organizational Certification Standards, which appear to be fundamentally different from other NERC Reliability Standards. In this regard, the RC certification team will not accidentally leave out an important component of the certification standards and, at the same time, will not violate the reliability operating standards.	The SDT has referenced Version 0 standards in an attempt to address your comments.
Southeastern Power Administration Carter B. Edge		X	It should be pointed out during the V-0 standard development process and in the subsequent Version 1 standards development process, and on many other	The SDT has referenced Version 0 standards in an attempt to address your comments.

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			<p>drafting teams, the drafting teams were instructed not to place duplicated requirements in two different standards. The appropriate procedure is to include the requirement in one standard and reference it in the other standard to prevent mistakenly updating it in one standard but not in the other as changes are required.</p> <p>We understand that the Certification drafting team has received different guidance which does not allow -referencing- of other standards. We feel this is a mistake and will cause potential problems with the standards themselves, and possibly jeopardizing reliability. We request that the drafting team provide the specific reference or source of the directives which forbids referencing the NERC Reliability Standards from within the Organizational Certification Standards. We believe that directive to be incorrect. This -no reference- directive appears to be particularly inappropriate for Organizational Certification Standards, which appear to be fundamentally different from other NERC Reliability Standards. In this regard, the RC certification team will not accidentally leave out an important component of the certification standards and, at the same time, will not violate the reliability operating standards.</p>	
<p>FRCC Eric Senkowicz – FRCC Linda Campbell – FRCC Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Cooperative. Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission.</p>		X	See comment to number 1	See response to number 1
<p>Hydro-Quebec TransEnergie Roger Champagne</p>	X		The issue of who will be responsible for approvals needs to be addressed.	The approval process for certification will be defined in the NERC Organization Registration and Certification Manual being developed by the CCC.
<p>Operating Reliability Working Group Robert Rhodes – SPP Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI</p>		X	We could support submitting the standard for ballot provided the issues mentioned in comments to Questions 2, 3 and 4 above are adequately addressed.	The SDT has made modifications to the standards in an attempt to address your comments.
Independent Electricity System Operator,		X	Once our above comments are incorporated then we	The SDT has made modifications to the standards in an

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Ontario Ron Falsetti			would consider these ready for balloting.	attempt to address your comments.
ISO New England Kathleen Goodman		X	The open issue of who will be responsible for approvals needs to be addressed before this can be balloted favorably.	The approval process for certification will be defined in the NERC Organization Registration and Certification Manual being developed by the CCC.
Midwest Reliability Organization Rober Coish – MRO Terry Bilke – MISO Dennis Florom – Linoln Electric Sys. Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members	X			
Manitoba Hydro Robert Coish	X			
Center Point Energy John Jonte Dennis Caufiled	X			
MAAC John Horakh	X			
CP9, Reliability Standards Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power Authority Roger Champagne – TransEnergie Peter Lebro – National Grid US Kathleen Goodman – ISO NE Greg Campoli – NY ISO David Little – Nova Scotia Power Khaqan Khan – The IESO (Ontario) Hydro One Netoworks Al Adamson – NY State Reliability Coun.		X	NPCC participating members believe clarification is required for the Standards to posted for ballot and the issue of "approval" needs to be resolved and explained.	The approval process for certification will be defined in the NERC Organization Registration and Certification Manual being developed by the CCC.
Tennessee Valley Authority Kathleen A. Davis Stuart Goza	X		none	