

Consideration of Comments on Second Posting of Transmission Operator Certification SAR

Background

The Certification of the Transmission Operator SAR was posted for a second public comment period from May 15 through June 13, 2003. The SAR DT asked industry participants to provide feedback on the revisions made to the SAR through a special SAR Comment Form. The comments can be viewed in their original format at:

<http://www.nerc.com/~filez/sar-approved.html>

In this document, the comments have been cut and pasted under each question. The SAR DT's consideration of comments is provided in yellow highlighted text immediately under each question. The SAR DT feels that consensus has been reached on the need for this standard, and on the scope of what should be included in this standard. There were several suggestions made during this last comment period that addressed further details of the standard's requirements. These suggestions have been highlighted and will be forwarded to the Certification Standard Drafting Team. The SAR DT will forward all of its work to the Standards Authorization Committee for review and authorization to move this SAR forward to the standard drafting stage.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Director-Standards, Tim Gallagher at 609-452-8060 or at tim.Gallagher@nerc.com.

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1. Do you agree that we have sufficiently clarified the differences between a single region and multiple region certifications? (Certification Process – Step 1 – Added language to differentiate the initiation of the application process for a TOP that will operate in a single Region from the initiation of the application process for a TOP that will operate in multiple Regions.).....	3
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1. Do you agree that we have sufficiently clarified the differences between a single region and multiple region certifications? (Certification Process – Step 1 – Added language to differentiate the initiation of the application process for a TOP that will operate in a single Region from the initiation of the application process for a TOP that will operate in multiple Regions.)

Summary Consideration: Industry consensus supports the clarification made with regards to the differences between a single and multiple regions. The SAR DT’s job is to get industry consensus on ‘what’ steps should be included in the certification process, and what criteria should be reviewed during the certification process. Additional details will be developed by the Certification Standard Drafting Team. Specific suggestions for the addition of details that should be included in the standard’s measures will be forwarded to the Certification Standard Drafting Team.

Commenter	Yes	No	Comments
Peter Burke for Paul Steinberger ATC #11	X		Good work
Tony Jankowski We Energies # 4	X		Formal request should be made to the Region where the most load resides
We will forward this suggestion to the Certification Standard Drafting Team.			
Alan Boesch NPPD #1	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
Ed Riley California ISO # 2	X		
<u>CenterPoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Darrel Richardson Illinois Power Company # 1,3	X		
Joseph Krupar Florida Municipal Power Agency # 3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
George Bartlett Ed Davis Entergy Services, Inc # 1	X		
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3	X		

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Richard Gilbert Lakeland Electric #3			
Marty Mennes Florida Power & Light Co #1			
Douglas Bullock PG & E #6			
Joe Roos Ocala Electric Utility #3			
Steve McElhaney FL Municipal Pwr Agency #5			
Robert Miller Kissimmee Utility Auth #3			
Paul Shipps Lakeland Electric #3			
Rusty Foster City of Tallahassee #3			
Mark Bennett Gainesville Regional Util #5			
Bob Remley Clay Electric Cooperative #4			
John Giddens Reedy Creek Impr District #3			
Ted Hobson JEA #1			
Eric Grant Progress Energy, Florida #1			
Chuck Harper Progress Energy, Florida #1			
Amy Long Lakeland Electric #3			
Greg Ramon Tampa Electric Company #1			
Ron Donahey Tampa Electric Company #3			
Ben Sharma Kissimmee Utility Authority #3			
Steve Wallace Seminole Electric Coop #4			
Gordon Pietsch Great River Energy # 1	X		
Geoff Elmer IMO # 2	X		
James R. Regg Tennessee Valley Authority # 1	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		
<u>Southern Company Transmission #1</u>	X		
Todd Lucas Southern Co			
Joe Payne Mississippi Power Company			
Travis Koval Southern Co			
Brian Mitchell Southern Co			
Bill Botters Southern Co			
Bill Pope Gulf Power Company			
Mike Miller Southern Co			
John Clark Southern Co			
Chris Wakefield Southern Co			
Keith Comeaux Cleco Power LLC # 1	X		

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Ken Githens Allegheny Energy Supply # 5	X		
Kenneth Skroback Alabama Electric Coop # 4	X		
Lee Xanthakos SCE&G # 1	X		
<u>Transmission Subcommittee</u>	X		
Daniel Cooper Michigan Public Power Agency			
Ken Donohoo ERCOT			
Michael Gildea Duke-Energy, North America			
Francis Halpin Bonneville Power Administration			
Thomas Mallinger Midwest ISO			
Darrick Moe Western Area Power Administration			
Scott Moore American Electric Power			
Bill Slater Florida Power Corporation			
Thomas Stuchlik Western Resources			
Joseph Stylinger Southern Wholesale Energy			
David Thorne K.H. Thorne Consultants Inc.			
Robert Waldele New York ISO			
John Ahr Alleghany Power			
Susan Morris SERC			
Ed Pfeiffer Ameren			
Ray Palmieri ECAR			
Thomas Vandervort NERC			
<u>CP9, NPCC Reliability Standards Working Group</u>	X		
David Kiguel Hydro One Networks #1			
Dan Stosick ISO-New England #2			
Mike Schiavone Niagara Mohawk #1			
Barry Gee National Grid USA #1			
Dave Little Nova Scotia Power #1			
Jim Ingleson New York ISO #2			
David Little New Brunswick Power #1			
Greg Campoli New York ISO #1			
Ralph Rufrano New York Power Authority #1			
Roger Champagne HydroQuebec TransEnergie #1			
Jerry Mosier NPCC #2			
Guy Zito NPCC #2			

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Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed	X		
Carter B. Edge Southeastern Pwr Adm # 4 & 5	X		
SERC Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2	X		
Terri M. Kuehneman SRP #3	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		
Kathleen Bauer Northwestern Energy	X		
Raj Rana AEP #1,3,5,6		X	The formal request should be addressed to each of the Regions. What if multiple regions do not agree. There should be a dispute resolution process in place to address such issues.
The process identifies that the applicant request must be submitted to one of the affected Regions and that the other Regions be copied on the request. Certification approval must be obtained from all affected Regions in order for the applicant to be granted certification. The process used for disputes is the dissenting Region's ADR process as defined in step #18 of the process.			

Summary of Comments on Second Posting of Transmission Operator Certification SAR

2. Do you agree that we have sufficiently clarified the differences between a single region and multiple region certifications? (Certification Process - Step 2 – Added language to differentiate the duties of a Region that receives a TOP certification application from an entity that wants to operate in a single Region from the duties of a Region that receives a TOP certification application from an entity that wants to operate in multiple Regions.)

Summary Consideration: Industry consensus supports the clarification made with regards to the differences between a single and multiple regions. The SAR DT’s job is to get industry consensus on ‘what’ steps should be included in the certification process, and what criteria should be reviewed during the certification process. Additional details will be developed by the Certification Standard Drafting Team. Specific suggestions for the addition of details that should be included in the standard’s measures will be forwarded to the Certification Standard Drafting Team.

Commenter	Yes	No	Comments
Peter Burke for Paul Steinberger ATC #11	X		Is there any concern to outline a process through which the Lead Region is selected?
We will forward your comment to the Standard Drafting Team appointed to develop the Certification Standards.			
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3	X		However, if all the affected Regions choose the "lead" Region, then would it make more sense in step 1 to submit the same request to all regions rather than to 1 with a cc to the others. That step seems to imply that the lead region has been chosen by the applicant.

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Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3			
We will forward your suggestion to the Standard Drafting Team appointed to develop the Certification Standards.			
Carter B. Edge Southeastern Power Adm # 4 & 5	X		The standard should define what process will be used to select a "lead region".
We will forward your suggestion to the Standard Drafting Team appointed to develop the Certification Standards.			
Tony Jankowski We Energies # 4	X		Lead Region should be based on load.
We will forward your suggestion to the Standard Drafting Team appointed to develop the Certification Standards.			
Alan Boesch NPPD #1	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
Ed Riley California ISO # 2	X		
<u>CenterPoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Darrel Richardson Illinois Power Company # 1,3	X		
Joseph Krupar Florida Municipal Power Agency # 3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
George Bartlett Ed Davis Entergy Services, Inc # 1	X		
Gordon Pietsch Great River Energy # 1	X		
Geoff Elmer IMO # 2	X		
James R. Regg Tennessee Valley Authority # 1	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		
<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co	X		

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Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co			
Keith Comeaux Cleco Power LLC # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		
Kenneth Skroback Alabama Electric Coop # 4	X		
Lee Xanthakos SCE&G # 1	X		
<u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC	X		
<u>CP9, NPCC Reliability Standards Working Group</u> David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2	X		

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David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2			
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed	X		
<u>SERC</u> Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2	X		
Terri M. Kuehneman SRP #3	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		
Kathleen Bauer Northwestern Energy	X		
Raj Rana AEP #1,3,5,6		X	What if multiple regions do not agree? There should be a dispute resolution process in place to resolve such issues.
Certification approval must be obtained from all affected Regions in order for the applicant to be granted certification. The process used for disputes is the dissenting Region's ADR process as defined in step #18 of the process.			

Summary of Comments on Second Posting of Transmission Operator Certification SAR

3. Do you agree with this modification to the process step #6 of the SAR? (Removed specific references to the IDC, and eliminated the phrase indicating that modeling would be placed on hold pending the awarding of certification.)

Summary Consideration: Industry consensus supports the modification that was made to step #6 in the TOP SAR.			
Commenter	Yes	No	Comments
Peter Burke for Paul Steinberger ATC #11	X		One concern would still exist where the modeling changes are underway and the Applicant fails to gain certification or backs out of the process. What responsibilities go along when the Applicant files?
There is no perfect way of addressing the timing of certification. If NERC and the Regions were to wait until certification were approved to begin the modeling changes, there would be costly delays in the start-up of the TOP. Addressing the costs associated with a 'failed application' is outside the scope of the SAR DT.			
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3	X		However, please review the redline document of the revised SAR. The word /Regional has not been added as mentioned above. We believe this was just a "cut and paste" error that needs to be corrected.

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This was a typographical error, and has been corrected as recommended.			
Carter Edge Southeastern Power Adm # 4 & 5	X		Please review the redline text, Regional Staff was left off of the text.
This was a typographical error, and has been corrected as recommended.			
Tony Jankowski We Energies # 4	X		The information necessary shall only be the information set forth in applicable Standards.
There may be some data that is required that is used to conduct analyses of reliability, but may not be needed for a specific Reliability Standard.			
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		The timing here seems a little flawed. The assumption seems to be that the entity requesting certification will be granted that certification since the process to modify the modeling /software is started immediately after the entity's application is received at NERC and before the certification review has been completed. What happens if certification is denied? A lot of work has been done for nothing.
There is no perfect way of addressing the timing of certification. If NERC and the Regions were to wait until certification were approved to begin the modeling changes, there would be costly delays in the start-up of the TOP.			
Alan Boesch NPPD #1	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
Ed Riley California ISO # 2	X		
<u>CenterPoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Darrel Richardson Illinois Power Company # 1,3	X		
Joseph Krupar Florida Municipal Power Agency # 3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
George Bartlett Ed Davis Entergy Services, Inc # 1	X		
Geoff Elmer IMO # 2	X		
James R. Regg Tennessee Valley Authority # 1	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		

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<u>Southern Company Transmission #1</u>	X		
Todd Lucas Southern Co			
Joe Payne Mississippi Power Company			
Travis Koval Southern Co			
Brian Mitchell Southern Co			
Bill Botters Southern Co			
Bill Pope Gulf Power Company			
Mike Miller Southern Co			
John Clark Southern Co			
Chris Wakefield Southern Co			
Keith Comeaux Cleco Power LLC # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		
Kenneth Skroback Alabama Electric Coop # 4	X		
Raj Rana AEP #1,3,5,6	X		
Lee Xanthakos SCE&G # 1	X		
<u>Transmission Subcommittee</u>	X		
Daniel Cooper Michigan Public Power Agency			
Ken Donohoo ERCOT			
Michael Gildea Duke-Energy, North America			
Francis Halpin Bonneville Power Administration			
Thomas Mallinger Midwest ISO			
Darrick Moe Western Area Power Administration			
Scott Moore American Electric Power			
Bill Slater Florida Power Corporation			
Thomas Stuchlik Western Resources			
Joseph Stylinger Southern Wholesale Energy			
David Thorne K.H. Thorne Consultants Inc.			
Robert Waldele New York ISO			
John Ahr Alleghany Power			
Susan Morris SERC			
Ed Pfeiffer Ameren			
Ray Palmieri ECAR			
Thomas Vandervort NERC			
<u>CP9, NPCC Reliability Standards Working Group</u>	X		

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David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2 David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2			
Ray Morella FirstEnergy Corp # 1	X		
SERC Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2	X		
Terri M. Kuehneman SRP #3	X		
William J. Smith Allegheny Power #1	X		
Kathleen Bauer Northwestern Energy	X		
Gordon Pietsch Great River Energy # 1		X	NERC staff should be working directly with the TOP to collect necessary information and make necessary modeling changes. The Region should be kept apprised of the status of this activity.
It is expected that NERC staff will work with the applicant and the Region in implementing any changes that are necessary. It may be necessary to provide different information to NERC and the Region.			
Southern Co. Generation & Energy Marketing #3,5,6 Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed		X	“Necessary information” should be defined by the Review Committee or by the Standard process to clearly define the necessary information to be certified. Also, the necessary information needs to pertain to reliability.
The Certification Standard will define the necessary information that must be provided			

Summary of Comments on Second Posting of Transmission Operator Certification SAR

4. Do you agree with the clarification made to the process step #7 of the SAR? (Added the word, 'all' to clarify that questionnaires and related documents would be sent to 'All adjacent TOPs'.)

Summary Consideration: Industry consensus supports the clarification that was made to Step #7 of the SAR.			
Commenter	Yes	No	Comments
Lee Xanthakos SCE&G # 1	X		I agree with the statement, but wonder what and adjacent TOP would have to report on an entity that is trying to get certification for the first time?
At least initially, many entities applying for certification will have been operating for many years and will already have an established working relationship with others who have been functionally operating as TOPs.			
Tony Jankowski We Energies # 4	X		And should also include its Transmission Owners.
Under the Functional Model, the TOP does not have a 'functional' relationship adjacent Transmission Owners – the TOP's relationship is with the adjacent TOPs. The TOP has a relationship with the Transmission Owner of the facilities the TOP operates.			
Alan Boesch NPPD #1	X		
Peter Burke for Paul Steinberger ATC #11	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
Ed Riley California ISO # 2	X		
CenterPoint Energy #1 Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Darrel W. Richardson Illinois Power Company # 1,3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
George Bartlett Ed Davis Entergy Services, Inc # 1	X		
FRCC Operating & Engineering Committees Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3	X		

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Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhane FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3			
Gordon Pietsch Great River Energy # 1	X		
Geoff Elmer IMO # 2	X		
James R. Regg Tennessee Valley Authority # 1	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		
<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co	X		

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Keith Comeaux Cleco Power LLC # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		
Kenneth Skroback Alabama Electric Coop # 4	X		
Raj Rana AEP #1,3,5,6	X		
<u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC	X		
<u>CP9, NPCC Reliability Standards Working Group</u> David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2 David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1	X		

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Jerry Mosier NPCC #2 Guy Zito NPCC #2			
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed	X		
Carter B. Edge Southeastern Power Administration # 4 & 5	X		
SERC Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2	X		
Terri M. Kuehneman SRP #3	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		
Kathleen Bauer Northwestern Energy	X		
Joseph Krupar Florida Municipal Pwr Agency # 3		X	The "All" should be changed to "bulk electric power system"
The intent of adding "ALL" was to provide the opportunity to obtain information that would be pertinent to the certification process from the entities that the applicant directly interconnects with performing the same function as defined in the Functional Model.			

Summary of Comments on Second Posting of Transmission Operator Certification SAR

5. Do you agree with this modification to the SAR? (Added language to clarify the intent of selecting a Review Team that had diverse representation.)

Summary Consideration: Industry consensus supports this modification to the SAR. Several comments address details that need to be addressed during the drafting of the specific language in the standard, and will be forwarded to the Certification Standard Drafting team.			
Commenter	Yes	No	Comments
<u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed	X		However, should NERC staff and Regional Staff be included as members of the Review team, there should be at least 5 members. This will ensure that 3 members from the categories listed under process #10 will be included as members.
Industry consensus supports the minimum number of review team members being three. The number of representatives is left to the discretion of the Region(s). The <u>minimum</u> number of members is three but this does not prevent the Region from having more representatives on the team. The intent is not to just have Regional representation on the team but that the team is composed of diverse representation. Your suggestion will be forwarded to the Certification Standard Drafting Team.			
Carter Edge Southeastern Power Adm # 4 & 5 <u>SERC</u> Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2	X		In order to allow NERC and Regional Staff participation, it is suggested that the Review Team be a minimum of five individuals. The selected individuals can include NERC and / or Regional Staff and will represent at least three of the categories.
Industry consensus supports the minimum number of review team members being three. The number of representatives is left to the discretion of the Region(s). The <u>minimum</u> number of members is three but this does not prevent the Region from having more representatives on the team. The intent is not to just have Regional representation on the team but that the team is composed of diverse representation. Your suggestion will be forwarded to the Certification Standard Drafting Team.			
Alan Boesch NPPD #1	X		
Peter Burke for Paul Steinberger ATC #11	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
Ed Riley California ISO # 2	X		
<u>CenterPoint Energy #1</u> Richard Sikes	X		

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John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun			
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Darrel Richardson Illinois Power Company # 1,3	X		
Joseph Krupar Florida Municipal Power Agency # 3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3	X		

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Gordon Pietsch Great River Energy # 1	X		
Geoff Elmer IMO # 2	X		
James R. Regg Tennessee Valley Authority # 1	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		
<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co	X		
Keith Comeaux Cleco Power LLC # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		
Kenneth Skroback Alabama Electric Coop # 4	X		
Raj Rana AEP #1,3,5,6	X		
Lee Xanthakos SCE&G # 1	X		
<u>CP9, NPCC Reliability Standards Working Group</u> David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2 David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2	X		

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Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		
Kathleen Bauer Northwestern Energy	X		
Terri M. Kuehneman SRP #3		X	Based on past certification experiences, the Review Team should consist of a minimum of five individuals. Where a Review Team decision influences the reliability of the system, they would greatly benefit from the broader point of view and experience.
Industry consensus supports the minimum number of review team members being three. The number of representatives is left to the discretion of the Region(s). The <u>minimum</u> number of members is three but this does not prevent the Region from having more representatives on the team. The intent is not to just have Regional representation on the team but that the team is composed of diverse representation.			
Tony Jankowski We Energies # 4		X	Should not include NERC staff, RTO, or other Region. These Representatives may be part of Team, but cannot make up the entire Team.
Industry consensus was obtained on the inclusion of NERC, RTO(when applicable), and Region representatives on the list of potential review team members. The intent is that the team is composed of diverse representation and the applicant has the right of mutual approval with the Region on the members of the review team. . We will forward your suggestion to the Certification Standard Drafting Team.			
George Bartlett Ed Davis Entergy Services, Inc # 1		X	However, we would add the qualification that the Review Team includes no market participants, Regional employees, nor NERC employees. We would be agreeable to Regional or NERC employees on the Review Team if the minimum number of individuals were increased to 5 (five), representing at least three of the categories.
Industry consensus supports the minimum number of review team members being three. The number of representatives is left to the discretion of the Region(s). The <u>minimum</u> number of members is three but this does not prevent the Region from having more representatives on the team. The intent is not to just have Regional representation on the team but that the team is composed of diverse representation. We will forward your suggestion to the Certification Standard Drafting Team.			
<u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration		X	The TS recommends the Review Team consist of a minimum of 5 members and represent at least 5 of the categories listed under Process Step #10.

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Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC			
Industry consensus supports the minimum number of review team members being three. The number of representatives is left to the discretion of the Region(s). The minimum number of members is three but this does not prevent the Region from having more representatives on the team.			

Summary of Comments on Second Posting of Transmission Operator Certification SAR

6. Do you agree with the addition to the SAR? (Certification Process – Step 10 – Added the following statement: “Review team members cannot be employees of the applicant or any of its affiliates.”)

Summary Consideration: Industry consensus supports the addition that was made to the SAR.			
Commenter	Yes	No	Comments
Alan Boesch NPPD #1	X		
Peter Burke for Paul Steinberger ATC #11	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
Ed Riley California ISO # 2	X		
CenterPoint Energy #1 Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Darrel Richardson Illinois Power Company # 1,3	X		
Joseph Krupar Florida Municipal Power Agency # 3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
George Bartlett Ed Davis Entergy Services, Inc # 1	X		
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3	X		

Summary of Comments on Second Posting of Transmission Operator Certification SAR

Mark Bennett	Gainesville Regional Util #5			
Bob Remley	Clay Electric Cooperative #4			
John Giddens	Reedy Creek Impr District #3			
Ted Hobson	JEA #1			
Eric Grant	Progress Energy, Florida #1			
Chuck Harper	Progress Energy, Florida #1			
Amy Long	Lakeland Electric #3			
Greg Ramon	Tampa Electric Company #1			
Ron Donahey	Tampa Electric Company #3			
Ben Sharma	Kissimmee Utility Authority #3			
Steve Wallace	Seminole Electric Coop #4			
Joe Krupar	FL Municipal Power Agency #3			
Gordon Pietsch	Great River Energy # 1	X		
Geoff Elmer	IMO # 2	X		
James R. Regg	Tennessee Valley Authority # 1	X		
Joanne K. Borrell	FirstEnergy Solutions # 3	X		
<u>Southern Company Transmission #1</u>		X		
Todd Lucas	Southern Co			
Joe Payne	Mississippi Power Company			
Travis Koval	Southern Co			
Brian Mitchell	Southern Co			
Bill Botters	Southern Co			
Bill Pope	Gulf Power Company			
Mike Miller	Southern Co			
John Clark	Southern Co			
Chris Wakefield	Southern Co			
Keith Comeaux	Cleco Power LLC # 1	X		
Ken Githens	Allegheny Energy Supply # 5	X		
Kenneth Skroback	Alabama Electric Coop # 4	X		
Raj Rana	AEP #1,3,5,6	X		
Lee Xanthakos	SCE&G # 1	X		
<u>Transmission Subcommittee</u>		X		

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Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC			
<u>CP9, NPCC Reliability Standards Working Group</u> David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2 David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2	X		
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u>	X		

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Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed			
Carter Edge Southeastern Power Adm # 4 & 5	X		
SERC Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2	X		
Terri M. Kuehneman SRP #3	X		
Tony Jankowski We Energies # 4	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		
Kathleen Bauer Northwestern Energy	X		

Summary of Comments on Second Posting of Transmission Operator Certification SAR

7. Do you agree that we have sufficiently clarified the issue of Regional representation? (Certification Process – Step 10 – Added a paragraph to indicate the makeup of the Review Team for certifications involving an entity that wants to operate in multiple Regions. Each of the Regions in which the applicant wants to operate must have a representative on the Review Team.)

Summary Consideration: Industry consensus supports the clarification that was made to the SAR regarding Regional representation on the review team. Several comments address details that need to be addressed during the drafting of the specific language in the standard, and will be forwarded to the Certification Standard Drafting team.			
Commenter	Yes	No	Comments
Peter Burke for Paul Steinberger ATC #11	X		But what happens when the Applicant does not give approval. Is this likely to happen? Is there every a concern that the Applicant would seek to have a favorable review team assembled?
The intent of the approval of review team representation was not to allow the applicant to handpick the review team, but rather to provide the opportunity to exclude an individual who they do not believe can provide a fair and unbiased evaluation.			
Darrel Richardson Illinois Power Company # 1,3	X		Although this addresses representation by regions, it clouds the water concerning representation from categories. i.e., If Applicant crosses three regions this implies that each regional representative could be from the same category. The statement “Remaining review team.....least two of the remaining categories” also implies that in the above scenario that an additional two members, from different categories, must be chosen. This seems to need clarification.
Your suggestion will be forwarded to the Certification Standard Drafting Team.			
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4	X		We agree that all regions involved should be able to choose their representative on the review team.

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John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3			
Lee Xanthakos SCE&G # 1	X		I agree with the message, but think wording is unclear and confusing – as in the BA SAR. My comments therefore are the same for this drafting team. Please consider rewording as following: “A review processes that involves an applicant seeking certification across Regional boundaries shall have a review team that consists of at least one member from each of the affected Regions. The review team members will be selected by the individual Regions they represent and not by the Lead Region. Regional representation is still subject to Applicant approval. Remaining review team members must represent at least two of the remaining categories
Your suggestion will be forwarded to the Certification Standard Drafting Team.			
Alan Boesch NPPD #1	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
<u>CenterPoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Joseph Krupar Florida Municipal Power Agency # 3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		

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George Bartlett Ed Davis Entergy Services, Inc # 1	X		
Gordon Pietsch Great River Energy # 1	X		
Geoff Elmer IMO # 2	X		
James R. Regg Tennessee Valley Authority # 1	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		
<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co	X		
Keith Comeaux Cleco Power LLC # 1	X		
Kenneth Skroback Alabama Electric Coop # 4	X		
Raj Rana AEP #1,3,5,6	X		
<u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC	X		

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Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC			
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed	X		
Carter B. Edge Southeastern Power Adm # 4 & 5	X		
<u>SERC</u> Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2	X		
Tony Jankowski We Energies # 4	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		
Kathleen Bauer Northwestern Energy	X		
Ed Riley California ISO # 2		X	The CISO objects to applicant approval of personnel certifying the applicant. If this process is used, we believe that there is a potential that only those individuals who agree with the applicant will be approved as possible team members.
The intent of the approval of review team representation was not to allow the applicant to handpick the review team, but rather to provide the opportunity to exclude an individual who they do not believe can provide a fair and unbiased evaluation.			
Terri M. Kuehneman SRP #3		X	There may not be two representatives remaining depending on the number of regions involved.
The intent is that at least three of the representative categories must be represented regardless of the number of Regions involved. Three members is the minimum number on the review team.			
CP9, NPCC Reliability Standards Working Group		X	The issue of an applicant's "approval" of the Regional representative

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<p>David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2 David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2</p>			<p>on the review team needs to be further clarified. It appears that the choice of a Regional representative, if it requires applicant approval, could be difficult and arduous process. On what basis would an applicant's rejection of a Regional representative be acceptable. Multiple refusals to accept a representative may be time consuming and lengthen the process.</p>
<p>The intent of the approval of review team representation was not to allow the applicant to handpick the review team, but rather to provide the opportunity to exclude an individual who they do not believe can provide a fair and unbiased evaluation. This has not been a problem with Control Area certification experiences.</p>			
<p>Ken Githens Allegheny Energy Supply # 5</p>		<p>X</p>	<p>If 2 regions are involved, does the review team consist of 4 members? One from each region and two from the remaining categories.</p>
<p>The number of representatives is left to the discretion of the Region(s). The <u>minimum</u> number of members is three but this does not prevent the Region from having more representatives on the team. The intent is not to just have Regional representation on the team but that the team is composed of diverse representation.</p>			

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8. Do you agree that a NERC representative can be a member of the review team, but is not a mandatory member?
(Certification Process – Step 10)

Summary Consideration: Industry consensus supports the inclusion of a NERC representative as a prospective review team member, but not as a mandatory member. Several comments address details that need to be addressed during the drafting of the specific language in the standard, and will be forwarded to the Certification Standard Drafting team.

Commenter	Yes	No	Comments
Peter Burke for Paul Steinberger ATC #11	X		I feel that NERC has oversight of the entire process and can be a member or the review team. The NERC seat on the review team should not displace a Region member.
As proposed, if a NERC staff member is appointed to the Review Team, the NERC staff member has an equal voice in the certification recommendation. The selection of a NERC representative uses one of the team slots – but doesn't necessarily displace any Region member.			
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4	X		Yes, NERC staff should be allowed to participate on the review team if desired.

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Joe Krupar FL Municipal Power Agency #3			
Gordon Pietsch Great River Energy # 1	X		If Regional Staff is not represented on the review team, then NERC staff should be on the review team.
We will forward your suggestion to the Certification Standard Drafting Team.			
Raj Rana AEP #1,3,5,6	X		Except for the NERC Staff
As proposed, if a NERC staff member is appointed to the Review Team, the NERC staff member has an equal voice in the certification recommendation.			
Roger D Green Southern Company Services - SOCO Generation # 5	X		Assuming NERC gets Regulatory rights through Legislative action (Energy Bill), it is not appropriate for NERC to be a voting member. Therefore, NERC should be a non-voting member only.
We will forward your comment to the Certification Standard Drafting Team.			
<u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed	X		NERC Staff team members should not have voting rights. Assuming NERC gets Regulatory rights through Legislative action (Energy Bill), it is not appropriate for the NERC representative to be a voting member.
As proposed, if a NERC staff member is appointed to the Review Team, the NERC staff member has an equal voice in the certification recommendation.			
SERC Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2 Carter Edge Southeastern Power Adm # 4 & 5	X		A NERC representative should only be assigned as a review team member if he or she has adequate technical expertise to serve. It may be more beneficial to allow a NERC representative to serve as an alternate (or passive member) to allow room for more technically experienced members on the review team.
We will forward your suggestion to the Certification Standard Drafting Team.			
Tony Jankowski We Energies # 4	X		Must be an additional member beyond the required 3 defined Representatives (see Question #5).
We will forward your suggestion to the Certification Standard Drafting Team.			
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		The benefit of having a NERC representative as a member of the review team should bring consistency and uniformity to the process.
Alan Boesch NPPD #1	X		

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MAPP Reliability Council (Lloyd Linke) #2	X		
<u>CenterPoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Darrel Richardson Illinois Power Company # 1,3	X		
Joseph Krupar Florida Municipal Power Agency # 3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
Geoff Elmer IMO # 2	X		
James R. Regg Tennessee Valley Authority # 1	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		
<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co	X		
Keith Comeaux Cleco Power LLC # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		
Kenneth Skroback Alabama Electric Coop # 4	X		
Lee Xanthakos SCE&G # 1	X		
JRAnderson Consumers Energy Co. # 3			
<u>Transmission Subcommittee</u>	X		

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Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Allegheny Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC			
<u>CP9, NPCC Reliability Standards Working Group</u> David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2 David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2	X		
Terri M. Kuehneman SRP #3	X		
William J. Smith Allegheny Power #1	X		

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Kathleen Bauer Northwestern Energy	X		
Ray Morella FirstEnergy Corp # 1			FirstEnergy believe that a member of NERC should be on the review team for consistency purposes
Industry consensus supports a NERC representative that is not mandatory and also supports the 3 member minimum review team.			
Ed Riley California ISO # 2		X	The CISO believes that a NERC (or Regional staff member) should be a mandatory member of each review team, which would create a 4 – member team – see answer to Question #4.
Industry consensus supports a NERC representative that is not mandatory and also supports the 3 member minimum review team.			
George Bartlett Ed Davis Entergy Services, Inc # 1		X	Review Team members should not be representatives of NERC. Many of the commentors of the second posting of the BA SAR answered yes to this question but then stated that NERC staff should “coordinate” the teams to bring consistency, but as a “non-voting” facilitator. However, it may be reasonable to have NERC and the Regional staff on the list of prospective review team members if the total number of team members is increased to “at least 5”.
Industry consensus supports a NERC representative that is not mandatory and also supports the 3 member minimum review team.			

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9. Do you agree that a representative from Regional staff should be on the list of prospective review team members?
(Certification Process – Step 10)

Summary Consideration: Industry consensus supports the inclusion of a Regional staff representative as a prospective review team member. Several comments address details that need to be addressed during the drafting of the specific language in the standard, and will be forwarded to the Certification Standard Drafting team.

Commenter	Yes	No	Comments
Ed Riley California ISO # 2	X		With the conditions stated in the CISO's answers to Questions #4 & 7, that either a NERC or Regional staff member should be mandatory on each review team.
We will forward your suggestion to the Certification Standard Drafting Team.			
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhane FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3	X		Yes, Regional staff should be allowed to participate on the review team if desired. We believe there is a category of potential review team members that has been omitted. We commented to this effect on the first posting of the SAR. We believe that distribution providers should also be on the list. The TOP can direct the distribution providers to interrupt customers so it would seem appropriate to allow them to participate just has generators and LSE's were added for the BA.

Summary of Comments on Second Posting of Transmission Operator Certification SAR

The process does not prevent Distribution Providers from being on the Review Team, but if selected, Distribution Providers will not count as one of the recommended categories. We will forward your comment to the Certification Standards Drafting Team.			
Gordon Pietsch Great River Energy # 1	X		If one can not be assigned, then NERC staff should be on the team.
We will forward your suggestion to the Certification Standard Drafting Team.			
SERC Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2 Carter Edge Southeastern Power Adm # 4 & 5	X		A Regional Staff representative should only be assigned as a review team member if he or she has adequate technical expertise to serve. It may be more beneficial to allow a Regional Staff representative to serve as an alternate (or passive member) to allow room for more technically experienced members on the review team.
We will forward your suggestion to the Certification Standard Drafting Team.			
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		The regional staff should be represented on the review team and could conceivably form the bulk of the team. This staff should possess the expertise to administer the certification program and to ensure that the review teams are accomplishing their task in a consistent manner.
We will forward your suggestion to the Certification Standard Drafting Team.			
Alan Boesch NPPD #1	X		
Peter Burke for Paul Steinberger ATC #11	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
CenterPoint Energy Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun #1	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Darrel Richardson Illinois Power Company # 1,3	X		
Joseph Krupar Florida Municipal Power Agency # 3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
Geoff Elmer IMO # 2	X		

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James R. Regg Tennessee Valley Authority # 1	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		
<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co	X		
Ken Githens Allegheny Energy Supply # 5	X		
Kenneth Skroback Alabama Electric Coop # 4	X		
Raj Rana AEP #1,3,5,6	X		
Lee Xanthakos SCE&G # 1	X		
<u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR	X		

Summary of Comments on Second Posting of Transmission Operator Certification SAR

Thomas Vandervort NERC			
<u>CP9, NPCC Reliability Standards Working Group</u>	X		
David Kiguel Hydro One Networks #1			
Dan Stosick ISO-New England #2			
Mike Schiavone Niagara Mohawk #1			
Barry Gee National Grid USA #1			
Dave Little Nova Scotia Power #1			
Jim Ingleson New York ISO #2			
David Little New Brunswick Power #1			
Greg Campoli New York ISO #1			
Ralph Rufrano New York Power Authority #1			
Roger Champagne HydroQuebec TransEnergie #1			
Jerry Mosier NPCC #2			
Guy Zito NPCC #2			
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u>	X		
Roman Carter			
Joel Dison			
Lucius Burris			
Clifford Shepard			
Lloyd Barnes			
Michael Smith			
Tony Reed			
Terri M. Kuehneman SRP #3	X		
Tony Jankowski We Energies # 4	X		
William J. Smith Allegheny Power #1	X		
Kathleen Bauer Northwestern Energy	X		
Keith Comeaux Cleco Power LLC # 1			Doesn't number 7 address this issue?

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Question 7 addressed having representatives who work in different regions serve on the Review Team when a TOP wants to operate across multiple Regions. These representatives may work in any of the functional areas listed – they may be TOPs, RAs, etc. as long as there is at least one person who works in each of the regions where the TOP will be operating.

Question 9 is addressing the option of having a Regional Staff member serve on a Review Team. The Regional Staff member is someone who works in the Regional Office, and wouldn't be a RA, TOP, etc.

George Bartlett Ed Davis Entergy Services, Inc # 1

X

See comment to question #8 above.

Review Team members should not be representatives of NERC. Many of the commentors of the second posting of the BA SAR answered yes to this question but then stated that NERC staff should “coordinate” the teams to bring consistency, but as a “non-voting” facilitator. However, it may be reasonable to have NERC and the Regional staff on the list of prospective review team members if the total number of team members is increased to “at least 5”.

Industry consensus supports a Regional representative that is not mandatory and also supports the 3 member minimum review team. The suggestion will be forwarded to the Certification Standard Drafting Team.

Summary of Comments on Second Posting of Transmission Operator Certification SAR

10. Do you agree with this addition to the SAR? (Certification Process – Step 14 – Added the following statement: “All members of the review team will have an equal voice in the certification recommendation.”)

Summary Consideration: Industry consensus supports the addition that was made to the SAR. Several comments address details that need to be addressed during the drafting of the specific language in the standard, and will be forwarded to the Certification Standard Drafting team.			
Commenter	Yes	No	Comments
Darrel Richardson Illinois Power Company # 1,3	X		However, this does not address how decisions are made. In other words, does it take a simple majority to approve/disapprove an Applicant? What happens if there is an even split?
Your comment will be forwarded to the Certification Standard Drafting Team.			
SERC Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2 Carter Edge Southeastern Power Adm # 4 & 5	X		This language may not provide enough direction and we suggest that additional clarifying language be added to capture the intent. The paragraph implies the goal is to reach consensus. However more direction is needed in the case consensus cannot be achieved. Perhaps equally weighted votes, if an impasse is reached, could determine the outcome of the certification recommendation.
Your comment will be forwarded to the Certification Standard Drafting Team.			
Raj Rana AEP #1,3,5,6	X		Except for a NERC Staff member who should not be a voting member.
As proposed, if a NERC staff member is appointed to the Review Team, the NERC staff member has an equal voice in the certification recommendation.			
Tony Jankowski We Energies # 4	X		Any minority position will also be presented with the recommendation.
This is what was intended, however the language in the SAR does not specifically require this. We will forward your suggestion to the Certification Standard Drafting Team.			
Alan Boesch NPPD #1	X		
Peter Burke for Paul Steinberger ATC #11	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
Ed Riley California ISO # 2	X		
<u>CenterPoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper	X		

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Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun			
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Joseph Krupar Florida Municipal Power Agency # 3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
George Bartlett Ed Davis Entergy Services, Inc # 1	X		
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhane FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3	X		
Gordon Pietsch Great River Energy # 1	X		
James R. Regg Tennessee Valley Authority # 1	X		

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Joanne K. Borrell FirstEnergy Solutions # 3	X		
<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co	X		
Keith Comeaux Cleco Power LLC # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		
Kenneth Skroback Alabama Electric Coop # 4	X		
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		
Kathleen Bauer Northwestern Energy	X		
Geoff Elmer IMO # 2		X	Need a clarification of what constitutes a recommendation ie. 2/3 consensus from review team or other criteria? The statement as currently constituted is to fuzzy.

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<p>All review team members will have a voice in the recommendation that is forwarded to the approving Regional body(ies). A reason the SAR DT chose the words, 'equal voice' was to allow a review team member to express a minority opinion or concern that would go along with the recommendation. The decision on granting certification is the responsibility of the Region(s) that utilizes the review team recommendation in their decision process. The details of the decision making process should be refined during the standard drafting stage of this process. We will forward your suggestion to the Certification Standard Drafting Team.</p>		
Terri M. Kuehneman SRP #3	X	Does "equal voice" mean an equal vote? If so, it should be stated. And, is the decision based on a unanimous vote or by majority?
<p>All review team members will have a voice in the recommendation that is forwarded to the approving Regional body(ies) . A reason the SAR DT chose the words, 'equal voice' was to allow a review team member to express a minority opinion or concern that would go along with the recommendation. The decision on granting certification is the responsibility of the Region(s) that utilizes the review team recommendation in their decision process. The details of the decision making process should be refined during the standard drafting stage of this process. We will forward your suggestion to the Certification Standard Drafting Team.</p>		
Lee Xanthakos SCE&G # 1	X	<p>Again, my comments here are the same as those I submitted for the BA SAR. They are as follows:</p> <p>Although I agree with the statement, I think it is insufficient. Additional information is necessary. For example, is there a vote by the members to recommend certification? If so, what percentage of the votes is necessary to make a decision one-way on another?</p> <p>Also, what if one or more members of the review team have a dissenting opinion? Does the process allow them to share their opinion with the regional council? I am afraid that their opinion will get lost if only one recommendation to the counsel from the review team is allowed.</p>
<p>All review team members will have a voice in the recommendation that is forwarded to the approving Regional body(ies) . A reason the SAR DT chose the words, 'equal voice' was to allow a review team member to express a minority opinion or concern that would go along with the recommendation. The decision on granting certification is the responsibility of the Region(s) that utilizes the review team recommendation in their decision process. The details of the decision making process should be refined during the standard drafting stage of this process. We will forward your suggestion to the Certification Standard Drafting Team.</p>		
<p><u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration</p>	X	The TS suggests adding clarifying language to the Process Step #14 to capture the intent – is “voice” meant to reach consensus or to support majority and minority opinions. The proposed language does not provide clear direction (e.g. voice versus vote). The TS also suggests adding language that describes actions when a consensus cannot be achieved by the Review Team.

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<p>Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC</p>			
<p>All review team members will have a voice in the recommendation that is forwarded to the approving Regional body(ies) . A reason the SAR DT chose the words, 'equal voice' was to allow a review team member to express a minority opinion or concern that would go along with the recommendation. The decision on granting certification is the responsibility of the Region(s) that utilizes the review team recommendation in their decision process. The details of the decision making process should be refined during the standard drafting stage of this process. We will forward your suggestion to the Certification Standard Drafting Team.</p>			
<p><u>CP9, NPCC Reliability Standards Working Group</u> David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2 David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2</p>		<p>X</p>	<p>This language may not provide enough direction and we suggest that additional clarifying language be added to capture the intent. The paragraph implies the goal is to reach consensus. However more direction is needed in the case consensus cannot be achieved. Perhaps equally weighted votes, if an impasse is reached, could determine the outcome of the certification.</p>
<p>All review team members will have a voice in the recommendation that is forwarded to the approving Regional body(ies) . A reason the SAR DT chose the words, 'equal voice' was to allow a review team member to express a minority opinion or concern that would go along with the recommendation. The decision on granting certification is the responsibility of the Region(s) that utilizes the review team recommendation in their decision process. The details of the decision making process should be refined during the standard drafting stage of this process. We will forward your suggestion to the Certification Standard Drafting Team.</p>			

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11. Do you agree that we have sufficiently clarified the differences between a single region and multiple region certifications? (Certification Process – Step 15 – Added language to identify the approval process in situations where an applicant wanted to operate in multiple Regions.)

Summary Consideration: Industry consensus supports the clarification that was made regarding the differences between a single and multiple region certifications. Several comments address details that need to be addressed during the drafting of the specific language in the standard, and will be forwarded to the Certification Standard Drafting team.

Commenter	Yes	No	Comments
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3	X		This is a good clarification.
<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company	X		In comments made on the BA Draft SAR Version 2, we stated that we believed further clarification was needed and made the following proposal: “ The certification recommendation is made by the review team and then approved or disapproved by the Region”. The intent

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Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co			here is that the Region approval is not a rubber stamp of the review team recommendation but is an informed decision made by the Region. In your response to this comment you stated "We agree and changes to the SAR will be made". However, no change was made.
This additional clarification was erroneously omitted but has been corrected and is reflected in the revised SAR.			
<u>CP9, NPCC Reliability Standards Working Group</u> David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2 David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2	X		Although we support this in concept it appears that blocking of approvals to certify Authorities should require published technical reasons.
This is what was intended. We will forward your suggestion to the Certification Standard Drafting Team.			
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		The process outlined above should address the situation where one or more of the affected region does not approve the recommendation while the other regions do.
Agreed. Additional details on the decision-making process should be developed by the Certification Standard Drafting Team.			
Alan Boesch NPPD #1	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
Ed Riley California ISO # 2	X		

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<u>CenterPoint Energy</u> Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun #1	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Darrel Richardson Illinois Power Company # 1,3	X		
Joseph Krupar Florida Municipal Power Agency # 3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
Gordon Pietsch Great River Energy # 1	X		
Geoff Elmer IMO # 2	X		
James R. Regg Tennessee Valley Authority # 1	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		
Keith Comeaux Cleco Power LLC # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		
Kenneth Skrobback Alabama Electric Coop # 4	X		
Lee Xanthakos SCE&G # 1	X		
<u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc.	X		

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Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC			
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed	X		
Terri M. Kuehneman SRP #3	X		
Tony Jankowski We Energies # 4	X		
William J. Smith Allegheny Power #1	X		
Kathleen Bauer Northwestern Energy	X		
George Bartlett Ed Davis Entergy Services, Inc # 1 SERC Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2 Carter B. Edge Southeastern Power Administration # 4 & 5		X	The additional wording helps. However, there are still several issues that we would like addressed. This process states that the Review Team makes a “recommendation” to the Region(s). However, this process does not state the process how the Region(s) decide to accept or reject that recommendation. This process does not indicate the authority of the Region to over-rule the Review Team recommendation in the Single Region case. It also does not indicate the authority of the individual Region, nor the collective Regions, to over-rule the Review Team recommendation, or the ability of the Lead Region to over-rule the Review Team or Regional recommendations. What process (criteria) will the Region(s) use to approve the application? We suggest the Review Team present the recommendation to all the

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			<p>affected Regions. The SAR should not specify the process to be used by the Region with the statement “appropriate Regional committees”. Therefore, we recommend the sentence – “The certification recommendation will be presented to the appropriate Regional committee(s) of all the affected Regions by the Review Team” be changed to have the Review Team present the recommendation to the affected Regions and allow the Regions to develop their own review process.</p>
<p>The wording “appropriate Regional committee(s)” allows for each Region to develop their approval process. The Review Team only provides a recommendation, the final decision lies with the Region. All affected Regions must approve certification in order for the Lead Region to award certification. The Lead Region cannot over-rule any other Regional decisions. The details of the decision making process should be refined during the standard drafting stage of this process. We will forward your suggestion to the Certification Standard Drafting Team.</p>			
<p>Raj Rana AEP #1,3,5,6</p>		<p>X</p>	<p>You still have not addressed what happens if one Region denies certification but the others grant certification. There should be a dispute resolution process in place to resolve such issues.</p>
<p>If any Region denies certification, the applicant can use the ADR process of the applicable Region as defined in step #18 in the SAR procedure.</p>			

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12. Do you agree that we have sufficiently clarified the differences between a single region and multiple region certifications? (Certification Process – Step 16 – Added language to distinguish the responsibility of the Lead Region in coordinating the certification approval process in the situation where an applicant wanted to operate in multiple Regions.)

Summary Consideration: Industry consensus supports the clarification that was made regarding the differences between a single and multiple region certifications.			
Commenter	Yes	No	Comments
Darrel Richardson Illinois Power Company # 1,3	X		The second sentence implies that the Lead Region has sole authority. There should be a clarifier added after “Lead Region” stating “(in consultation with the affected Regions)” similar to sentence number 3.
Agreed. The SAR was modified to reflect this clarification.			
Alan Boesch NPPD #1	X		
Peter Burke for Paul Steinberger ATC #11	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
Ed Riley California ISO # 2	X		
<u>CenterPoint Energy</u> Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun #1	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Joseph Krupar Florida Municipal Power Agency # 3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6	X		

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Joe Roos Ocala Electric Utility #3			
Steve McElhaney FL Municipal Pwr Agency #5			
Robert Miller Kissimmee Utility Auth #3			
Paul Shipps Lakeland Electric #3			
Rusty Foster City of Tallahassee #3			
Mark Bennett Gainesville Regional Util #5			
Bob Remley Clay Electric Cooperative #4			
John Giddens Reedy Creek Impr District #3			
Ted Hobson JEA #1			
Eric Grant Progress Energy, Florida #1			
Chuck Harper Progress Energy, Florida #1			
Amy Long Lakeland Electric #3			
Greg Ramon Tampa Electric Company #1			
Ron Donahey Tampa Electric Company #3			
Ben Sharma Kissimmee Utility Authority #3			
Steve Wallace Seminole Electric Coop #4			
Joe Krupar FL Municipal Power Agency #3			
Gordon Pietsch Great River Energy # 1	X		
Geoff Elmer IMO # 2	X		
James R. Regg Tennessee Valley Authority # 1	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		
<u>Southern Company Transmission #1</u>	X		
Todd Lucas Southern Co			
Joe Payne Mississippi Power Company			
Travis Koval Southern Co			
Brian Mitchell Southern Co			
Bill Botters Southern Co			
Bill Pope Gulf Power Company			
Mike Miller Southern Co			
John Clark Southern Co			
Chris Wakefield Southern Co			
Keith Comeaux Cleco Power LLC # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		

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Kenneth Skroback Alabama Electric Coop # 4	X		
Lee Xanthakos SCE&G # 1	X		
<u>CP9, NPCC Reliability Standards Working Group</u> David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2 David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2	X		
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		
Kathleen Bauer Northwestern Energy	X		
Terri M. Kuehneman SRP #3	X		
Carter B. Edge Southeastern Power Administration # 4 & 5		X	The pending certification is a good idea but the terms and conditions for gaining approval should also be conveyed to the applicant. We suggest adding to the phrase - "grant 'pending certification' to the

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			<p>applicant”, the following “and specify the conditions, which if met within the specified time frame, will result in approval.”</p> <p>Can “pending certification” be extended? Under what circumstances? How many times?</p>
<p>The statement “If the Applicant meets the conditions set by the Region(s), within the granted timeframe, the Region or Lead Region must respond to the Applicant’s notification of completion of requirements within 30 days.” was intended to address this. This re-phrasing will be forwarded to the Standard Drafting team for consideration.</p>			
<p>The intent was never to allow for extensions of the “pending certification” period as defined in step #16 of the procedure.</p>			
<p>SERC Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2 George Bartlett Ed Davis Entergy Services, Inc # 1</p>		X	<p>The pending certification is a good idea but the terms and conditions for gaining approval should also be conveyed to the applicant. We suggest adding to the phrase - “grant ‘pending certification’ to the applicant”, the following “and specify the conditions, which if met within the specified time frame, will result in approval.”</p>
<p>The statement “If the Applicant meets the conditions set by the Region(s), within the granted timeframe, the Region or Lead Region must respond to the Applicant’s notification of completion of requirements within 30 days.” was intended to address this. This re-phrasing will be forwarded to the Standard Drafting team for consideration.</p>			
<p>Tony Jankowski We Energies # 4</p>		X	<p>Pending Certification – Can the applicant operate during the 180 day timeframe? This is similar to Default and Cure period</p>
<p>The applicant can only operate after certification has been awarded.</p>			
<p><u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power</p>		X	<p>The TS supports “pending certification” with the following enhanced language “. . . grant ‘pending certification’ to the applicant and specify the conditions, which if met within the specified time frame, will result in approval. The pending certification shall . . . “</p>

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Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC			
The statement "If the Applicant meets the conditions set by the Region(s), within the granted timeframe, the Region or Lead Region must respond to the Applicant's notification of completion of requirements within 30 days." was intended to address this. This re-phrasing will be forwarded to the Standard Drafting team for consideration.			
Raj Rana AEP #1,3,5,6		X	See comments under #11. <i>You still have not addressed what happens if one Region denies certification but the others grant certification. There should be a dispute resolution process in place to resolve such issues.</i>
If any Region denies certification, the applicant can use the ADR process of the applicable Region as defined in step #18 in the SAR procedure.			

13. Do you agree with imposing a 12-month time period for an entity applying for TOP certification to begin operation or be subject to re-apply for certification? (Certification Process – Step 17)

Summary Consideration: Industry consensus supports the 12-month time period to begin operation after being awarded certification. Several comments address details that need to be addressed during the drafting of the specific language in the standard, and will be forwarded to the Certification Standards Drafting team.

Commenter	Yes	No	Comments
Ed Riley California ISO # 2	X		The CISO believes that there should be provision for extension of the 12 month period. This (these) extension(s) should not exceed an additional 12 months, and must be granted, in writing, by the original review team.
The intent of the 12 month period was to ensure operation started before the data collected during the review process was so old that it couldn't be considered a reliable indicator of whether or not an entity was 'ready' to meet its reliability-related responsibilities.			
Darrel Richardson Illinois Power Company # 1,3	X		However, this implies that there could be a time lag between when certification by the Region/Lead Region is granted and the operational date as set forth by NERC. If this is true, then the time limit should begin from the date as set forth by NERC.
We will forward your comment to the Certification Standard Drafting Team.			
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1	X		We support a maximum time period but had previously suggested a shorter time frame. We do not have a strong opinion so can agree with the 12 months.

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Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3			
<u>CP9, NPCC Reliability Standards Working Group</u> David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2 David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2	X		The phrase “commence operations” needs to be defined. Will the assumption of partial roles constitute commencement of operations? What would the effect be on the timeframe if a TOP were to “commence operations” and then temporarily cease them due to complications that may extend beyond the 12 month window? Would this require re-certification? Should a “phase in” for sequence of operations be permitted?
The areas you’ve highlighted should be addressed during the drafting of the language for the standard and will be forwarded to the Certification Standard Drafting Team.			
Carter B. Edge Southeastern Power Administration # 4 & 5	X		The phrase “commence operations” needs to be defined. Will the assumption of partial roles constitute commencement of operations? What would the effect be on the timeframe if a IA were to “commence operations” and then temporarily cease them due to complications that may extend beyond the 12 month window? Would this require re-certification? Will failure to commence operations result in the entity’s application being withdrawn? Will this be communicated to the entity in writing prior to the expiration of the 12 months?
The areas you’ve highlighted should be addressed during the drafting of the language for the standard and will be forwarded to the Certification Standard Drafting Team.			
SERC Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2	X		The current SERC procedure for control area certification includes a 12-month time period and it works well. However, some SERC Member Companies feel that a 6-month time period is more appropriate. The phrase “commence operations” needs to be defined.

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			Will the assumption of partial roles constitute commencement of operations? What would the effect be on the timeframe if a TOP were to “commence operations” and then temporarily cease them due to complications that may extend beyond the 12 month window? Would this require re-certification?
If SERC wants to require a 6-month time period, then this should be submitted as a Regional Difference. The other areas you’ve suggested should be addressed during the drafting of the language for the standard and will be forwarded to the Certification Standard Drafting Team.			
Alan Boesch NPPD #1	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
CenterPoint Energy #1 Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Joseph Krupar Florida Municipal Power Agency # 3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
Gordon Pietsch Great River Energy # 1	X		
Geoff Elmer IMO # 2	X		
James R. Regg Tennessee Valley Authority # 1	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		

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Southern Company Transmission #1 Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co	X		
Keith Comeaux Cleco Power LLC # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		
Kenneth Skroback Alabama Electric Coop # 4	X		
Lee Xanthakos SCE&G # 1	X		
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed	X		
Terri M. Kuehneman SRP #3	X		
Tony Jankowski We Energies # 4	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		
Kathleen Bauer Northwestern Energy	X		
George Bartlett Ed Davis Entergy Services, Inc # 1		X	We believe 12 months is too long. The entity should be "near ready" to begin operations when the certification process begins. The entity should be "ready" to begin operations once approved, or he should not

Summary of Comments on Second Posting of Transmission Operator Certification SAR

			be approved. There is a time frame after which an entity would need to be re-certified for many reasons, e.g., loss of expertise through employee attrition, loss of competence through not exercising the approved functions. Gauging the elapsed time between certification and loss of expertise we suggest the entity should commence operation with six (6) months of certification or be re-certified.
Industry consensus supports the 12-month time period.			
Raj Rana AEP #1,3,5,6		X	No need for certifying an organization to be a Transmission Operator. For example, NERC does not certify an organization to be a generator operator.
Industry consensus supports the certification of entities performing the Transmission Operator function.			
<u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC		X	The TS agrees and supports the 12 – month time period for an entity applying for certification to begin operation or be subject to re-application for certification. The TS recommends defining “commence operations.” “Commence operations” is too ambiguous. Examples of ambiguity: 1) Does partial completion of requirements constitute commence operations? 2) If a TOP starts operations (commences operations) then stops shortly afterwards, is the requirement fulfilled? 3) Are phase-in approaches satisfactory approaches to commence operations?
The intent of “commence operation” was that the entity has assumed all of the responsibilities associated with a Certified Transmission Operator.			

14. Do you agree that a re-certification process should be part of the SAR?

Summary Consideration: Considering the responses and comments received on this and the other certification SARs, the SAR DT does not feel that industry consensus supports the inclusion of the separate re-certification process in the SAR. Reasons previously discussed for re-certification (change in footprint, flagrant violation, and repeated non-compliance) are triggers for initiating the certification process. Based on this conclusion, references to re-certification are no longer required. The SAR DT considers the summary consideration as response to the comments.

Commenter	Yes	No	Comments
Peter Burke for Paul Steinberger ATC #11	X		It is important that a Re-certification process exist, especially where appreciable changes occur. As stated the trigger points need to be determined. Also there may be concern to Re-certify after a time period, like 10 years, just to make sure the terms of the certification are still being met. However, a timed Re-certification places a burden on the industry to carry out this process.
Gordon Pietsch Great River Energy # 1	X		Yes, as long as the NERC Compliance criteria are included in the Standard.
<u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC	X		See General Certification Process comment in Q 24. 1) <i>Process Step #10, potential review team members need to be qualified to perform the TOP Certification review assessment. Questions 8 and 9 asked about the NERC Representative and the Regional Staff – Review Team members. However, a general statement of the qualifications of the individuals is necessary. Simply having a employee or designated individual from the Process Step #10 categories does not satisfy the TS. These individuals need to be qualified to perform the review and make sound recommendations. The TS recommends the SAR add a personnel qualification statement in Process Step #10.</i> 2) <i>The TS does not think the TOP, BA, IA or RA certifications should be standards. The certification process is just that – a “process.” Processes do not affect the reliability of the bulk transmission system. The TS recommends the Certification Processes be developed into Procedures. This includes certification, re-certification, and de-certification processes be developed into Procedures – not Reliability Standards. The TS hopes the SAR process is used to only start the certification process rolling and the next step will be to develop “Certification Procedures” and not Reliability Standards.</i>

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Southern Co. Generation & Energy Marketing #3,5,6 Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed	X		However, they should only be recertified in the areas in which they were non-compliant. Further, it is not recommended that open-ended statements be used in this process as stated “ defined by NERC compliance (to be determined) criteria”.
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		The NERC Compliance process should include a requirement to review the performance of the entities which have been certified as RAs on a periodic basis. If an entity fails this performance review it should be subject to re-certification. The criteria to determine “pass/failure” would be established by NERC Compliance.
Alan Boesch NPPD #1	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
Ed Riley California ISO # 2	X		
CenterPoint Energy #1 Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Darrel Richardson Illinois Power Company # 1,3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
George Bartlett Ed Davis Entergy Services, Inc # 1	X		
Geoff Elmer IMO # 2	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		

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<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co	X		
Keith Comeaux Cleco Power LLC # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		
Kenneth Skroback Alabama Electric Coop # 4	X		
Raj Rana AEP #1,3,5,6	X		
Lee Xanthakos SCE&G # 1	X		
<u>CP9, NPCC Reliability Standards Working Group</u> David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2 David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2	X		
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		

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Terri M. Kuehneman SRP #3	X		
William J. Smith Allegheny Power #1	X		
Kathleen Bauer Northwestern Energy	X		
Dan Kay South Mississippi Electric Pwr Assoc #3		X	I can not currently agree with the above statement not knowing what the "to be developed" definition will be.
Joseph Krupar Florida Municipal Power Agency # 3		X	Re-certification is not needed because if an entity is De-certified then the entity can just be certified again.
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3		X	We do not believe there should be a re-certification process. The NERC Compliance Program removes the need for recertification. If compliance monitoring determines that an entity performing the TOP function should be de-certified, it should be clear that to become certified again, the NERC certification process will be used. The idea of re-certification is really not necessary and brings a lot of baggage with that term,
James R. Regg Tennessee Valley Authority # 1		X	We would prefer not having re-certification be part of the Standard if by adding it to the Standard it makes it difficult to modify.
Carter B. Edge		X	What is the definition of the term "NERC Compliance" noted above?

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<p>Southeastern Power Administration # 4 & 5</p> <p>SERC Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2</p>			<p>Is the SAR DT talking about a “to be determined” NERC Standard? This is a perfect example of why the process/procedure to certify entities such as Transmission Operators should not be a Standard itself, rather, it should be a process/procedure developed through a separate, certification formal due process and it should reference established Reliability Standards. Since the SAR DT cannot get their arms around this issue, shouldn’t this be a warning sign that the Certification Process is different than the Standards process? Other problems with force-fitting a certification procedure into a Standard include confusion due the mixing of terms and intentions and will result in the certification process becoming very difficult to modify. A Standard should not contain an open-ended statement, such as:...”defined by NERC Compliance (to be determined) criteria”.</p>
<p>Tony Jankowski We Energies # 4</p>		<p>X</p>	<p>There should be no criteria developed outside the SAR/Reliability Standard Process.</p>

15. If you agree that the Re-certification Process should be part of the SAR, do you agree with the process for re-certification that has been added to the SAR?

Summary Consideration: Considering the responses and comments received on this and the other certification SARs, the SAR DT does not feel that industry consensus supports the inclusion of the separate re-certification process in the SAR. Reasons previously discussed for re-certification (change in footprint, flagrant violation, and repeated non-compliance) are triggers for initiating the certification process. Based on this conclusion, references to re-certification are no longer required. The SAR DT considers the summary consideration as response to the comments.

Commenter	Yes	No	Comments
Peter Burke for Paul Steinberger ATC #11	X		See comment #14. <i>It is important that a Re-certification process exist, especially where appreciable changes occur. As stated the trigger points need to be determined. Also there may be concern to Re-certify after a time period, like 10 years, just to make sure the terms of the certification are still being met. However, a timed Re-certification places a burden on the industry to carry out this process.</i>
Alan Boesch NPPD #1	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
<u>CenterPoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Darrel Richardson Illinois Power Company # 1,3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
Gordon Pietsch Great River Energy # 1	X		
Geoff Elmer IMO # 2	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		

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<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co	X		
Keith Comeaux Cleco Power LLC # 1	X		
<u>CP9, NPCC Reliability Standards Working Group</u> David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2 David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2	X		
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith	X		

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Tony Reed			
Terri M. Kuehneman SRP #3	X		
Tony Jankowski We Energies # 4	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		
Kathleen Bauer Northwestern Energy	X		
Ed Riley California ISO # 2		X	The CISO believes that re- certification should be every five years (or some designated frequency). We will not vote “yes” to a criteria that “is yet to be developed” outside this process.
Dan Kay South Mississippi Electric Pwr Assoc #3		X	I can not currently agree with the above statement not knowing what the “to be developed” definition will be.
George Bartlett Ed Davis Entergy Services, Inc # 1		X	<p>We agree that this “certification procedure” should contain a “re-certification process” (note this is a “procedure”, not a “standard”). However, we wonder:-Would an “entity” that is “certified” to perform TOP “functions” ever have to be re-certified for reasons other than “non-compliance”? For example, it may be decided that a given certification is time limited and every entity must be re-certified every XX years.- Is “NERC Compliance” (whoever that is) going to define the criteria the violation of which would require re-certification? On the surface we think this is not appropriate.- Who is going to make the “XX year” decision? Who is going to define the criteria? What are the “criteria” requiring re-certification? Is there a separate “standard” being developed specifying this “criteria”? Is NERC Compliance going to make that decision. Again, we think this is not appropriate.</p> <p>In a separate line of thought, we also wonder:</p> <ul style="list-style-type: none"> - What are the criteria violations that would require a certified “entity” to endure a completely new “certification process”, as opposed to the criteria violation that might require re-certification of one function performed by the “entity” performing the TOP functions? - Do the authors intend a completely new certification process be performed for every criteria violation? <p>We suggest making the following changes to the SAR statement: When re-certification is required events occur that subject an entity to be re-certified as defined by NERC Compliance (to be</p>

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			determined) criteria, the process used for re-certification will be administered in accordance with the certification procedure contained in this SAR.
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3		X	See comment in 14 above <i>We do not believe there should be a re-certification process. The NERC Compliance Program removes the need for recertification. If compliance monitoring determines that an entity performing the TOP function should be de-certified, it should be clear that to become certified again, the NERC certification process will be used. The idea of re-certification is really not necessary and brings a lot of baggage with that term,</i>
James R. Regg Tennessee Valley Authority # 1		X	See number 14. <i>We would prefer not having re-certification be part of the Standard if by adding it to the Standard it makes it difficult to modify.</i>
Ken Githens Allegheny Energy Supply # 5		X	The to be determined criteria needs to be developed before proceeding.
Kenneth Skroback Alabama Electric Coop # 4		X	The requirements are as yet undetermined. This would be like signing a blank check.
Raj Rana AEP #1,3,5,6		X	This SAR and resulting standard, not NERC Compliance, should

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			determine the appropriate criteria for re-certification. The performance measures developed for the standard should dictate when re-certification is required pending the development of the NERC Compliance criteria through the SAR process.
Lee Xanthakos SCE&G # 1		X	This statement is broad, ambiguous, and generally confusing. For example, what does “events” refer to? I cannot agree this, especially to terms that are “to be developed” without knowing what they are.
<u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC		X	The TS considers the “NERC Compliance (to be determined) criteria” language open-ended and vague. The SAR process should establish the events and criteria that subject an entity to be re-certified. See General Certification Process comment in Q 24.
SERC Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2		X	See comments in question 14. <i>What is the definition of the term “NERC Compliance” noted above? Is the SAR DT talking about a “to be determined” NERC Standard? This is a perfect example of why the process/procedure to certify entities such as Transmission Operators should not be a Standard itself, rather, it should be a process/procedure developed through a separate, certification formal due process and it should reference established Reliability Standards. Since the SAR DT cannot get their</i>

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			<p><i>arms around this issue, shouldn't this be a warning sign that the Certification Process is different than the Standards process? Other problems with force-fitting a certification procedure into a Standard include confusion due the mixing of terms and intentions and will result in the certification process becoming very difficult to modify. A Standard should not contain an open-ended statement, such as:..."defined by NERC Compliance (to be determined) criteria".</i></p>
Carter B. Edge Southeastern Power Adm # 4 & 5		X	

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16. Do you agree that a De-certification Process should be part of the SAR?

Summary Consideration: Industry consensus supports the inclusion of a de-certification process in this SAR. Several comments address details that need to be addressed during the drafting of the specific language in the standard, and will be forwarded to the Certification Standard Drafting team.			
Commenter	Yes	No	Comments
Peter Burke for Paul Steinberger ATC #11	X		Definitely needed. A question? If a certified entity does not follow industry rules can it be forcibly De-certified?
Non-compliance penalties are an issue for the Compliance & Certification Committee and are not being addressed as part of this SAR.			
Gordon Pietsch Great River Energy # 1	X		Step 4 replace "notice" with "notify"
The SAR has been modified to reflect this recommendation.			
CP9, NPCC Reliability Standards Working Group David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2 David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2	X		We agree for the need to have a continuity in TOP function during the de-certification process however there are questions that exist as to what the role of the decertified TOP will have in the naming of the new TOP and how the TOP function will be performed if the decertified TOP ceases operation before the new TOP assumes their role. Also, what would happen if the TOP requesting de-certification has not named a replacement TOP or one is not willing to accept that TOP's role.
Your comments address some of the details that need to be addressed during the drafting of the specific language in the standard, and will be forwarded to the Certification Standard Drafting team.			
Tony Jankowski We Energies # 4	X		Each Transmission Owner shall designate which TOP will assume responsibility for assets.
Your comment will be forwarded to the Certification Standard Drafting team.			
Alan Boesch NPPD #1	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
Ed Riley California ISO # 2	X		

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CenterPoint Energy #1 Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Darrel Richardson Illinois Power Company # 1,3	X		
Joseph Krupar Florida Municipal Power Agency # 3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
George Bartlett Ed Davis Entergy Services, Inc # 1	X		
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3	X		

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Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3			
Geoff Elmer IMO # 2	X		
James R. Regg Tennessee Valley Authority # 1	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		
<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co	X		
Keith Comeaux Cleco Power LLC # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		
Kenneth Skroback Alabama Electric Coop # 4	X		
Lee Xanthakos SCE&G # 1	X		
<u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO	X		

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John Ahr Allegheny Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC			
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed	X		
Carter B. Edge Southeastern Power Administration # 4 & 5	X		
Terri M. Kuehneman SRP #3	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		
Kathleen Bauer Northwestern Energy	X		
Raj Rana AEP #1,3,5,6		X	See comments under #13 above <i>No need for certifying an organization to be a Transmission Operator. For example, NERC does not certify an organization to be a generator operator.</i>
Industry consensus supports the certification of the entity performing the Transmission Operator function.			

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17. If you agree that the De-certification Process should be part of the SAR, do you agree with the process for De-certification that has been added to the SAR?

Summary Consideration: Industry consensus supports the addition of the de-certification process. Several comments received question the process for de-certification due to non-compliance. Involuntary de-certification is an issue for the Compliance & Certification Committee and are not being addressed as part of this SAR.			
Commenter	Yes	No	Comments
Peter Burke for Paul Steinberger ATC #11	X		See comments in #14,#16 <i>Definitely needed. A question? If a certified entity does not follow industry rules can it be forcibly De-certified?</i>
Non-compliance penalties are an issue for the Compliance & Certification Committee and are not being addressed as part of this SAR.			
Gerald Rheault Manitoba Hydro # 1,3,5,6			In item 4 the word "notice" should be "notify".
The SAR has been revised to reflect this recommendation.			
<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co	X		This does not address de-certification for non-compliance.
Non-compliance penalties are an issue for the Compliance & Certification Committee and are not being addressed as part of this SAR.			
Alan Boesch NPPD #1	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
George Bartlett Ed Davis Entergy Services, Inc # 1	X		
Gordon Pietsch Great River Energy # 1	X		
Geoff Elmer IMO # 2	X		
James R. Regg Tennessee Valley Authority # 1	X		

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Joanne K. Borrell FirstEnergy Solutions # 3	X		
Keith Comeaux Cleco Power LLC # 1	X		
Lee Xanthakos SCE&G # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		
Kenneth Skroback Alabama Electric Coop # 4	X		
<u>CP9, NPCC Reliability Standards Working Group</u>	X		
David Kiguel Hydro One Networks #1			
Dan Stosick ISO-New England #2			
Mike Schiavone Niagara Mohawk #1			
Barry Gee National Grid USA #1			
Dave Little Nova Scotia Power #1			
Jim Ingleson New York ISO #2			
David Little New Brunswick Power #1			
Greg Campoli New York ISO #1			
Ralph Rufrano New York Power Authority #1			
Roger Champagne HydroQuebec TransEnergie #1			
Jerry Mosier NPCC #2			
Guy Zito NPCC #2			
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u>	X		
Roman Carter			
Joel Dison			
Lucius Burris			
Clifford Shepard			
Lloyd Barnes			
Michael Smith			
Tony Reed			
Tony Jankowski We Energies # 4	X		
William J. Smith Allegheny Power #1	X		

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Kathleen Bauer Northwestern Energy	X		
Ed Riley California ISO # 2		X	The CISO believes that the SAR should also include provision for de-certification of an entity that is a “bad actor” and therefore should not be allowed to continue functioning as an TOP.
Industry consensus supports the addition of the de-certification process. Non-compliance penalties are an issue for the Compliance & Certification Committee and are not being addressed as part of this SAR.			
<u>CenterPoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun		X	This is with the assumption that, if a Transmission Operator is no longer able to perform and can not find a suitable replacement, the process would be the same as any other business no longer able to continue operations.
This situation is outside the scope of this SAR. The process requires an entity to obtain a replacement before ceasing operation.			
Terri M. Kuehneman SRP #3		X	Suggest a modification of 2.: If the entity is certified, but new to the region, the Lead Region contacts them with regard to their start date. If the new entity is not certified, the Lead Region contacts the entity about the start of certification.
The applicant has the responsibility to begin the certification process. If the entity wishes to be certified to operate in a new Region, the entity must notify the affected Regions to initiate the certification process.			
Darrel Richardson Illinois Power Company # 1,3		X	This only covers the instance of requested de-certification. There is nothing discussed in the above that addresses the issue of de-certification due to non-compliance.
Industry consensus supports the addition of the de-certification process. Non-compliance penalties are an issue for the Compliance & Certification Committee and are not being addressed as part of this SAR.			
Joseph Krupar Florida Municipal Pwr Agency # 3		X	Need to expand process to include De-certification for non-compliance of reliability standards.
Industry consensus supports the addition of the de-certification process. Non-compliance penalties are an issue for the Compliance & Certification Committee and are not being addressed as part of this SAR.			
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1		X	We do agree that the steps for de-certification are necessary, however, the words you have added only apply to when an entity performing the TOP function no longer wishes to do that. De-certification is also needed when there is repetitive non-compliance or flagrant violation of the reliability standards that apply to the TOP function. The steps you have written for the voluntary de-certification

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<p>Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhane FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3</p>			<p>seem appropriate for that narrow circumstance, but words should be added when it is necessary to de-certify due to significant non-compliance issues.</p>
<p>Industry consensus supports the addition of the de-certification process. Non-compliance penalties are an issue for the Compliance & Certification Committee and are not being addressed as part of this SAR.</p>			
<p>Carter B. Edge Southeastern Power Administration # 4 & 5</p>		<p>X</p>	<p>What process does the IA(s) assuming additional responsibilities go through to be certified?</p>
<p>TOP Certification process. (Assuming that IA meant TOP)</p>			
<p>Raj Rana AEP #1,3,5,6</p>		<p>X</p>	<p>See comments under #13 above <i>No need for certifying an organization to be a Transmission Operator. For example, NERC does not certify an organization to be a generator operator.</i></p>
<p>Industry consensus supports the certification of entities that perform the Transmission Operator function.</p>			
<p><u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration</p>		<p>X</p>	<p>The TS suggests enhanced language to ensure continuity in TOP function during the de-certification process. Specifically: 1) What will happen if and when the de-certifying TOP ceases operation before the new TOP assumes their role? 2) What is the scenario if the requesting de-certification TOP has not named a replacement TOP or</p>

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<p>Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC</p>			<p>one is not willing to accept the TOP's role?</p>
<p>This situation is outside the scope of this SAR. The process requires an entity to obtain a replacement before ceasing operation.</p>			

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18. Do you agree with the clarification that has been added to the Introduction section of the SAR? (The following statement was added: “NERC Policies and Standards applicable to the Transmission Operator function must be adhered to until they are replaced by Reliability Standards or retired.”)

Summary Consideration: Industry consensus supports the addition that was made to the Introduction of the criteria in the SAR.

Commenter	Yes	No	Comments
CenterPoint Energy #1 Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		"has" added the following statements
This was a typographical error.			
Darrel Richardson Illinois Power Company # 1,3	X		However, is this really needed.
Carter Edge Southeastern Power Adm # 4 & 5	X		The applicable NERC Policies and Standards should be identified
Additional details will be added during the Standard Drafting Stage of this process.			
Alan Boesch NPPD #1	X		
Peter Burke for Paul Steinberger ATC #11	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
Ed Riley California ISO # 2	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
George Bartlett Ed Davis Entergy Services, Inc # 1	X		
Gordon Pietsch Great River Energy # 1	X		
Geoff Elmer IMO # 2	X		
James R. Regg Tennessee Valley Authority # 1	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		

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<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co	X		
Keith Comeaux Cleco Power LLC # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		
Kenneth Skroback Alabama Electric Coop # 4	X		
Raj Rana AEP #1,3,5,6	X		
Lee Xanthakos SCE&G # 1	X		
<u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC	X		

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<u>CP9, NPCC Reliability Standards Working Group</u> David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2 David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2	X		
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed	X		
<u>SERC</u> Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2	X		
Terri M. Kuehneman SRP #3	X		
Tony Jankowski We Energies # 4	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		

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Kathleen Bauer Northwestern Energy	X		
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3			We are neutral on this point. These words do not really add anything to this proposed standard. Certification will be granted on the basis of meeting the criteria established and the compliance monitoring that follows.

19. Should the TOP have agreements in place with all of their adjacent TOP(s) that address coordination of seams issues and day-to-day interactions?

Summary Consideration: Industry consensus was not obtained on including agreements with adjacent TOPs. The requirement to have agreements with adjacent TOPs will not be added to the SAR. The SAR DT will consider this summary consideration as a response to all comments received for this question.

Commenter	Yes	No	Comments
Peter Burke for Paul Steinberger ATC #11	X		This is really important. Some sample concerns. Is a connected entity going to provide VAR support? Is a connected entity going to participate in a black start situation? Is a connected entity going to provide adequate and timely equipment data? Is a connected entity going to participate in load shedding both auto and manual for security and reliability reason?
Darrel Richardson Illinois Power Company # 1,3	X		This is far too vague to be able to respond to the question. If agreements are to be put in place, then this needs to address what the specific agreement(s) should contain. Also, current agreements that are in place would need to fall under this category.
<u>SERC</u> Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2	X		Some SERC Member Companies feel that seams issues and day-to-day interactions seem more like business practices and contractual issues than reliability concerns.
Tony Jankowski We Energies # 4	X		Also must have agreement with its BA as stated in the BA Certification SAR.
Alan Boesch NPPD #1	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
Ed Riley California ISO # 2	X		
<u>CenterPoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
George Bartlett Ed Davis Entergy Services, Inc # 1	X		

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Gordon Pietsch Great River Energy # 1	X		
Geoff Elmer IMO # 2	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		
<u>Southern Company Transmission #1</u>	X		
Todd Lucas Southern Co			
Joe Payne Mississippi Power Company			
Travis Koval Southern Co			
Brian Mitchell Southern Co			
Bill Botters Southern Co			
Bill Pope Gulf Power Company			
Mike Miller Southern Co			
John Clark Southern Co			
Chris Wakefield Southern Co			
Ken Githens Allegheny Energy Supply # 5	X		
Lee Xanthakos SCE&G # 1	X		
<u>CP9, NPCC Reliability Standards Working Group</u>	X		
David Kiguel Hydro One Networks #1			
Dan Stosick ISO-New England #2			
Mike Schiavone Niagara Mohawk #1			
Barry Gee National Grid USA #1			
Dave Little Nova Scotia Power #1			
Jim Ingleson New York ISO #2			
David Little New Brunswick Power #1			
Greg Campoli New York ISO #1			
Ralph Rufrano New York Power Authority #1			
Roger Champagne HydroQuebec TransEnergie #1			
Jerry Mosier NPCC #2			
Guy Zito NPCC #2			
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u>	X		
Roman Carter			

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Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed			
Carter Edge Southeastern Power Adm # 4 & 5	X		
Terri M. Kuehneman SRP #3	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		
Kathleen Bauer Northwestern Energy	X		
Joseph Krupar Florida Municipal Power Agency # 3		X	The Region(s) can have the agreements and responsibilities of each function necessary in the Region(s) Reliability Plan.
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3		X	FRCC does not believe that individual agreements with each entity are necessary. A Regions 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. We stated this belief in the comments on the first TOP SAR and also on the BA SAR. The SAR drafting team has left them in place on the BA SAR. Even though we do not agree they are necessary, why would the BA be subject to this and the TOP not. There should be consistency in either case.

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Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3			
James R. Regg Tennessee Valley Authority # 1		X	This appears to be more of a business practice?
Keith Comeaux Cleco Power LLC # 1		X	Since it is proposed for the TOP to comply with the NERC Policies and Standards, it would seem the type of coordination required by the TOP's would be addressed in compliance templates such as regional restoration plans, black start and so-forth. Interconnect agreements would apply also.
Kenneth Skroback Alabama Electric Coop # 4		X	Seams issues and day-to-day interactions seem more like business practices and contractual issues than reliability concerns. NERC standards should be sufficient to elicit proper behavior with regards to reliability.
Raj Rana AEP #1,3,5,6		X	What "problem" is being addressed here? NERC Policies (and most likely the new Reliability Standards) require Control Areas and/or transmission operators today to coordinate their activities. Why there is a need for another piece of paper to these coordinate activities? Additionally, the handling of seams issues will be by the RAs, BAs, and IAs for the most part. Will the NERC Reliability Standards be dictating the terms and conditions of these agreements?
<u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC		X	The TS is not sure where the agreements should be placed. The agreements with all of their adjacent TOP(s) may need to be required by the "Coordinate Operations" Standard. Or, the agreements with all of their adjacent TOP(s) may actually be in "Market Practices Standards."

Summary of Comments on Second Posting of Transmission Operator Certification SAR

Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC			
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20. Do you agree that the requirements for the Code of Conduct should be removed from the criteria? (Criteria 4.3 and 4.4)

Summary Consideration: There appears to a very strong majority in favor of removing the Code of Conduct from the SAR. These results in conjunction with the FMRTG removing the requirement from the Functional Model have led the SAR DT to remove this requirement from the SAR.

Commenter	Yes	No	Comments
Dan Kay South Mississippi Electric Pwr Assoc #3	X		<p>Confidentiality and Codes of Conduct are clearly business practice issues and have no reliability impact & thus should be excluded from any and all NERC policies and standards.</p> <p>Many non FERC jurisdictional entities currently serve as their own TO and is conceivable that a group of non FERC jurisdictional entities could form a single TO for multiple non FERC jurisdictional entities. If the requirements for the Codes of Conduct were to remain a part of the SAR, the SAR could be in violation of the Market Principle “ An Organization Standard shall neither mandate nor prohibit any specific market structure” where the market structure is one of a cooperative or other non FERC jurisdictional vertically integrated utilities.</p>
The requirements for the Code of Conduct have been removed from the SAR.			
<p><u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1</p>	X		<p>We did support the removal of the code of conduct criteria on the BA SAR and do also here. However, we did not support the removal of the confidentiality agreement requirement on the BA SAR and it was removed anyway. We ask the same question of the SAR drafting team, why would it be appropriate to have a confidentiality agreement requirement on the TOP and not the BA? We believe the confidentiality agreement requirement should be placed on any entity performing a reliability function since the information that is available to them can be commercially sensitive. Again, there should be consistency in this requirement for all reliability functions.</p>

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Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3			
<p>We agree there should be consistency. Your comment will be forwarded to the Certification Standard Drafting Team.</p>			
Kenneth Skroback Alabama Electric Coop # 4	X		I think that both the code of conduct requirements and the NERC Confidentiality Agreement requirements should be removed. We are a FERC non-jurisdictional company and we are currently able to serve as our own TOP without having signed either of the above documents. There has been no regulatory change to date that would require us to separate functions, sign either document or to participate in an RTO. Therefore, I think there needs to be an accommodation in the new standard to allow non-jurisdictional entities to serve as their own TOP. On the other hand, I think that an RTO should be required to sign the NERC agreement because they are dealing with multiple companies. Maybe a distinction between a single company TOP (who self provides this service) and a multiple company TOP (who would provide this service for others) would work here (similar to the distinction between a single region TOP and a multiple region TOP). A single company TOP would not have to sign either document but a multiple company TOP would at least have to sign the NERC Confidentiality document. Since the Code of Conduct is a FERC document, I think it should be up to FERC to determine who is required to sign it.
<p>The requirements for the Code of Conduct have been removed from the SAR.</p>			
<u>CP9, NPCC Reliability Standards Working Group</u> David Kiguel Hydro One Networks #1 Dan Stosick ISO-New England #2 Mike Schiavone Niagara Mohawk #1 Barry Gee National Grid USA #1 Dave Little Nova Scotia Power #1 Jim Ingleson New York ISO #2 David Little New Brunswick Power #1 Greg Campoli New York ISO #1	X		Yes, FERC 888 Codes of conduct apply already to entities in the US engaged in both transmission operations and wholesale market functions and their reference here is of limited use especially given FERC does not have jurisdiction over the Canadian entities.

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Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2			
The requirements for the Code of Conduct have been removed from the SAR.			
Lee Xanthakos SCE&G # 1	X		Code of conduct is not a NERC issue
The requirements for the Code of Conduct have been removed from the SAR.			
Carter Edge Southeastern Power Adm # 4 & 5	X		There is no reliability basis for this requirement and should not be included as a requirement for certification.
The requirements for the Code of Conduct have been removed from the SAR.			
Alan Boesch NPPD #1	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
CenterPoint Energy #1 Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Joseph Krupar Florida Municipal Power Agency # 3	X		
Gordon Pietsch Great River Energy # 1	X		
Geoff Elmer IMO # 2	X		
James R. Regg Tennessee Valley Authority # 1	X		

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<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co	X		
Keith Comeaux Cleco Power LLC # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		
Terri M. Kuehneman SRP #3	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		
Kathleen Bauer Northwestern Energy	X		
<u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC	X		

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Roger D Green Southern Company Services - SOCO Generation # 5	X		
Southern Co. Generation & Energy Marketing #3,5,6 Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed		X	Without signing the code of conduct, it's possible for a TOP to provide sensitive transmission data to one entity and not another. The Confidentiality Agreement is not enough.
Although the requirement has been removed from the SAR, personnel are still under obligation to understand their responsibilities with regard to information sharing.			
SERC Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2		X	We suggest keeping these requirements requiring documentation that the TOP personnel are aware of their obligations and responsibilities under the code of conduct. There is not a consensus among SERC Member Companies on this issue, mainly because there are some non-jurisdictional SERC Member Companies who have not functionally separated and perform TOP functions.
Although the requirement has been removed from the SAR, personnel are still under obligation to understand their responsibilities with regard to information sharing.			
Tony Jankowski We Energies # 4		X	Should sign NERC Confidentiality Agreement and fall under a NERC Code of Conduct.
There appears to a very strong majority in favor of removing the Code of Conduct from the SAR. These results in conjunction with the FMRTG removing the requirement from the Functional Model have led the SAR DT to remove this requirement from the SAR.			
Peter Burke for Paul Steinberger ATC # 1		X	There needs to be some mention of need to adhere or at least respect the Codes of Conduct. If this subject is left out of the SAR it can become an issue in emergency situations and even local tenuous situation when entities feel they are sharing market sensitive information and have no guarantees that their concern will be respected.
There appears to a very strong majority in favor of removing the Code of Conduct from the SAR. These results in conjunction with the FMRTG removing the requirement from the Functional Model have led the SAR DT to remove this requirement from the SAR.			
Ed Riley California ISO # 2		X	The CISO believes that rather than removing it, the Code of Conduct should be specifically identified, or a new Code of Conduct created.

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<p>There appears to a very strong majority in favor of removing the Code of Conduct from the SAR. These results in conjunction with the FMRTG removing the requirement from the Functional Model have led the SAR DT to remove this requirement from the SAR.</p>			
George Bartlett Ed Davis Entergy Services, Inc # 1		X	We suggest keeping these requirements requiring documentation that the TOP personnel are aware of their obligations and responsibilities under the code of conduct.
<p>Although the requirement has been removed from the SAR, personnel are still under obligation to understand their responsibilities with regard to information sharing.</p>			
Darrel Richardson Illinois Power Company # 1,3		X	
Edward C. Stein FirstEnergy Solutions # 6		X	
Joanne K. Borrell FirstEnergy Solutions # 3		X	
William J. Smith Allegheny Power #1		X	
Raj Rana AEP 1,3,5,6		X	
Ray Morella FirstEnergy Corp # 1		X	

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21. Do you agree with the addition of tools to the criteria requirement? (The phrase, ‘and tools’ was added to the following: “Process/procedure and tools in place for obtaining generation and transmission system information.”)

Summary Consideration: There is a consensus that supports the inclusion of tools in the requirement with further definition of tools. Further definition will be accomplished in the standard drafting process.

Commenter	Yes	No	Comments
Raj Rana AEP #1,3,5,6	X		This sentence should read, "Process, procedure and tools in place for obtaining generation and transmission system information."
Your comment will be forwarded to the Certification Standards Drafting Team for consideration.			
Alan Boesch NPPD #1	X		
Peter Burke for Paul Steinberger ATC #11	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
CenterPoint Energy #1 Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Darrel Richardson Illinois Power Company # 1,3	X		
Joseph Krupar Florida Municipal Power Agency # 3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
FRCC Operating & Engineering Committees Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3	X		

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Mark Bennett	Gainesville Regional Util	#5			
Bob Remley	Clay Electric Cooperative	#4			
John Giddens	Reedy Creek Impr District	#3			
Ted Hobson	JEA	#1			
Eric Grant	Progress Energy, Florida	#1			
Chuck Harper	Progress Energy, Florida	#1			
Amy Long	Lakeland Electric	#3			
Greg Ramon	Tampa Electric Company	#1			
Ron Donahey	Tampa Electric Company	#3			
Ben Sharma	Kissimmee Utility Authority	#3			
Steve Wallace	Seminole Electric Coop	#4			
Joe Krupar	FL Municipal Power Agency	#3			
Gordon Pietsch	Great River Energy	# 1	X		
Geoff Elmer	IMO	# 2	X		
Joanne K. Borrell	FirstEnergy Solutions	# 3	X		
<u>Southern Company Transmission #1</u>			X		
Todd Lucas	Southern Co				
Joe Payne	Mississippi Power Company				
Travis Koval	Southern Co				
Brian Mitchell	Southern Co				
Bill Botters	Southern Co				
Bill Pope	Gulf Power Company				
Mike Miller	Southern Co				
John Clark	Southern Co				
Chris Wakefield	Southern Co				
Keith Comeaux	Cleco Power LLC	# 1	X		
Ken Githens	Allegheny Energy Supply	# 5	X		
<u>CP9, NPCC Reliability Standards Working Group</u>			X		
David Kiguel	Hydro One Networks	#1			
Dan Stosick	ISO-New England	#2			
Mike Schiavone	Niagara Mohawk	#1			
Barry Gee	National Grid USA	#1			
Dave Little	Nova Scotia Power	#1			
Jim Ingleson	New York ISO	#2			

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David Little New Brunswick Power #1 Greg Campoli New York ISO #1 Ralph Rufrano New York Power Authority #1 Roger Champagne HydroQuebec TransEnergie #1 Jerry Mosier NPCC #2 Guy Zito NPCC #2			
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed	X		
Terri M. Kuehneman SRP #3	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		
Kathleen Bauer Northwestern Energy	X		
SERC Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2		X	If the phrase "and tools" is used, then it seems necessary to list the adequate tools. Otherwise, this will result in inconsistencies in interpretations by different review teams. The real question should be: "Does the entity have the process/procedure implementation in place to perform..." . Everything can be in place, including tools, but if there is no implementation, then it doesn't matter if tools are in place or not.
There is a consensus that supports the inclusion of tools in the requirement with further definition of tools. Further definition will be accomplished in the standard drafting process. Tools were added to ensure that the processes and procedures could be implemented. Certification is meant to determine ability and not to measure performance which will be handled by Compliance.			
Tony Jankowski We Energies # 4		X	Tool is a very general term, not sure what you mean.
Further definition will be accomplished in the standard drafting process. Tools were added to ensure that the processes and procedures could be implemented.			
Ed Riley California ISO # 2		X	Perhaps adding "systems" in place of tools, but "tools" should be

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			removed from 5.2.
There is a consensus that supports the inclusion of tools in the requirement with further definition of tools. Further definition will be accomplished in the standard drafting process.			
Dan Kay South Mississippi Electric Pwr Assoc #3		X	Tools need to either be defined or left out
Further definition of tools will be accomplished in the standard drafting process.			
George Bartlett Ed Davis Entergy Services, Inc # 1		X	It seems, for clarification, that all of this needs to be “implemented” to obtain “actual, real-time generation and transmission system measured data”. Therefore, we suggest the following changes: 5.2 Process/procedure and tools in place and implemented tofor obtaining actual, real-time generation and transmission system information measured data.
Further definition will be accomplished in the standard drafting process.			
James R. Regg Tennessee Valley Authority # 1		X	Not sure what the tools might be.
Further definition will be accomplished in the standard drafting process.			
Kenneth Skroback Alabama Electric Coop # 4		X	If you have the process/procedure in place, doesn't it follow that you must have the tools?
Tools were added to ensure that the processes and procedures could be implemented.			
Lee Xanthakos SCE&G # 1		X	Too general
Further definition will be accomplished in the standard drafting process.			
Transmission Subcommittee Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO		X	The TS believes “tools” is not necessary for 5.2 language. The TS also recommends removing “tools” from 5.3, and 5.4. “Tools” is too general and the descriptive language in 5.2, 5.3, and 5.4 is clear without the additional term.

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John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC			
There is a consensus that supports the inclusion of tools in the requirement with further definition of tools. Further definition will be accomplished in the standard drafting process. Tools were added to ensure that the processes and procedures could be implemented.			
Carter B. Edge Southeastern Power Administration # 4 & 5		X	

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22. Do you agree with this addition to the criteria requirement? (Process/procedure and tools in place for compliance with all applicable NERC Reliability Standards.)

Summary Consideration: There is general consensus that supports the inclusion of the requirement to have "Process/procedure and tools in place for compliance with all applicable NERC reliability standards". The specifics of this will be developed and subject to review as part of the Standard drafting process.			
Commenter	Yes	No	Comments
Kenneth Skroback Alabama Electric Coop # 4	X		See above re: tools. If you have the process/procedure in place, doesn't it follow that you must have the tools?
Not necessarily. You may develop a procedure for analyzing system conditions, but without additional tools in place, the system operators working for the TOP wouldn't be able to implement the procedure.			
Raj Rana AEP #1,3,5,6	X		This sentence should read, " Process, procedure and tools in place for compliance with all applicable NERC Reliability Standards."
Your comment will be forwarded to the Certification Standards Drafting Team for consideration.			
CP9, NPCC Reliability Standards Working Group	X		We suggest adding ...NERC "and Regional" Reliability Standards.
David Kiguel Hydro One Networks #1			
Dan Stosick ISO-New England #2			
Mike Schiavone Niagara Mohawk #1			
Barry Gee National Grid USA #1			
Dave Little Nova Scotia Power #1			
Jim Ingleson New York ISO #2			
David Little New Brunswick Power #1			
Greg Campoli New York ISO #1			
Ralph Rufrano New York Power Authority #1			
Roger Champagne HydroQuebec TransEnergie #1			
Jerry Mosier NPCC #2			
Guy Zito NPCC #2			
If there are specific Regional Standards, these should be identified as a Regional Difference.			
Alan Boesch NPPD #1	X		
Peter Burke for Paul Steinberger ATC #11	X		
MAPP Reliability Council (Lloyd Linke) #2	X		

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<u>CenterPoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Darrel Richardson Illinois Power Company # 1,3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
Gordon Pietsch Great River Energy # 1	X		
Geoff Elmer IMO # 2	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		
<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company Mike Miller Southern Co John Clark Southern Co Chris Wakefield Southern Co	X		
Keith Comeaux Cleco Power LLC # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green Southern Company Services - SOCO Generation # 5	X		
<u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes	X		

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Michael Smith Tony Reed			
SERC Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2			
Terri M. Kuehneman SRP #3	X		
Tony Jankowski We Energies # 4	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		
Kathleen Bauer Northwestern Energy	X		
Ed Riley California ISO # 2		X	We do not agree with "tools", but perhaps "systems".
There is a consensus that supports the inclusion of tools in the requirement with further definition of tools. Further definition will be accomplished in the standard drafting process.			
Dan Kay South Mississippi Electric Power Assoc #3		X	Tools need to either be defined or left out
Further definition will be accomplished in the standard drafting process.			
Joseph Krupar Florida Municipal Power Agency # 3		X	Not sure this statement is needed because the compliance program should take care of this and if it does not then there is De-certification.
There is general consensus that supports the inclusion of the requirement to have "Process/procedure and tools in place for compliance with all applicable NERC reliability standards". The specifics of this will be developed and subject to review as part of the Standard development process. Certification is to ensure ability and Compliance is to ensure performance.			
George Bartlett Ed Davis Entergy Services, Inc # 1		X	The "applicable" NERC standards should be identified.
The applicable Standards will be identified as a result of the Standards drafting process.			
FRCC Operating & Engineering Committees Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3		X	This seems extremely broad and subject to interpretation. This is not in the 3rd version of the BA SAR and wonder why it was added here. It is not necessary and should be deleted.

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Rusty Foster City of Tallahassee #3			
Mark Bennett Gainesville Regional Util #5			
Bob Remley Clay Electric Cooperative #4			
John Giddens Reedy Creek Impr District #3			
Ted Hobson JEA #1			
Eric Grant Progress Energy, Florida #1			
Chuck Harper Progress Energy, Florida #1			
Amy Long Lakeland Electric #3			
Greg Ramon Tampa Electric Company #1			
Ron Donahey Tampa Electric Company #3			
Ben Sharma Kissimmee Utility Authority #3			
Steve Wallace Seminole Electric Coop #4			
Joe Krupar FL Municipal Power Agency #3			
<p>There is general consensus that supports the inclusion of the requirement to have "Process/procedure and tools in place for compliance with all applicable NERC reliability standards". The specifics of this will be developed and subject to review as part of the Standard development process.</p> <p>It was not added to the BA SAR because there was already two references in the criteria (4.1 & 4.8) to NERC Reliability Standards.</p>			
James R. Regg Tennessee Valley Authority # 1		X	What are the applicable NERC Reliability Standards?
<p>The applicable Standards will be identified as a result of the Standards drafting process.</p>			
Lee Xanthakos SCE&G # 1		X	I agree with the need for such a statement, but believe that it needs to be more specific. The way it's written now is terribly subjective., and compliance would depend on the opinions individual auditor
<p>The criteria and measurements will be defined as part of the Standard development process.</p>			
<u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy		X	The TS believes this requirement is overkill. The certification and standards that the TOP abides by are the NERC Reliability Standards. The 5.7 Certification Criteria is not necessary.

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David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC			
There is general consensus that supports the inclusion of the requirement to have "Process/procedure and tools in place for compliance with all applicable NERC reliability standards". The requirement to adhere to NERC Reliability Standards was not present in the criteria previously.			
Carter Edge Southeastern Power Adm # 4 & 5		X	

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23. Do you agree with the addition of this requirement to the criteria? (Plan in place that ensures continued operation during abnormal and emergency conditions due to the loss of facilities.)

Summary Consideration: Industry consensus supports the addition of this requirement to the criteria.			
Commenter	Yes	No	Comments
Alan Boesch NPPD #1	X		
Peter Burke for Paul Steinberger ATC #11	X		
MAPP Reliability Council (Lloyd Linke) #2	X		
Ed Riley California ISO # 2	X		
CenterPoint Energy #1 Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		
Dan Kay South Mississippi Electric Pwr Assoc #3	X		
Darrel Richardson Illinois Power Company # 1,3	X		
Edward C. Stein FirstEnergy Solutions # 6	X		
George Bartlett Ed Davis Entergy Services, Inc # 1	X		
Gordon Pietsch Great River Energy # 1	X		
Geoff Elmer IMO # 2	X		
James R. Regg Tennessee Valley Authority # 1	X		
Joanne K. Borrell FirstEnergy Solutions # 3	X		

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<u>Southern Company Transmission #1</u>	X		
Todd Lucas Southern Co			
Joe Payne Mississippi Power Company			
Travis Koval Southern Co			
Brian Mitchell Southern Co			
Bill Botters Southern Co			
Bill Pope Gulf Power Company			
Mike Miller Southern Co			
John Clark Southern Co			
Chris Wakefield Southern Co			
Keith Comeaux Cleco Power LLC # 1	X		
Ken Githens Allegheny Energy Supply # 5	X		
Kenneth Skroback Alabama Electric Coop # 4	X		
Raj Rana AEP #1,3,5,6	X		
Lee Xanthakos SCE&G # 1	X		
<u>Transmission Subcommittee</u>	X		
Daniel Cooper Michigan Public Power Agency			
Ken Donohoo ERCOT			
Michael Gildea Duke-Energy, North America			
Francis Halpin Bonneville Power Administration			
Thomas Mallinger Midwest ISO			
Darrick Moe Western Area Power Administration			
Scott Moore American Electric Power			
Bill Slater Florida Power Corporation			
Thomas Stuchlik Western Resources			
Joseph Stylinger Southern Wholesale Energy			
David Thorne K.H. Thorne Consultants Inc.			
Robert Waldele New York ISO			
John Ahr Alleghany Power			
Susan Morris SERC			
Ed Pfeiffer Ameren			
Ray Palmieri ECAR			
Thomas Vandervort NERC			

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CP9, NPCC Reliability Standards Working Group	X		
David Kiguel Hydro One Networks #1			
Dan Stosick ISO-New England #2			
Mike Schiavone Niagara Mohawk #1			
Barry Gee National Grid USA #1			
Dave Little Nova Scotia Power #1			
Jim Ingleson New York ISO #2			
David Little New Brunswick Power #1			
Greg Campoli New York ISO #1			
Ralph Rufrano New York Power Authority #1			
Roger Champagne HydroQuebec TransEnergie #1			
Jerry Mosier NPCC #2			
Guy Zito NPCC #2			
Ray Morella FirstEnergy Corp # 1	X		
Roger D Green	X		
Southern Company Services - SOCO Generation # 5			
<u>Southern Co. Generation & Energy Marketing #3,5,6</u>	X		
Roman Carter			
Joel Dison			
Lucius Burris			
Clifford Shepard			
Lloyd Barnes			
Michael Smith			
Tony Reed			
Carter Edge Southeastern Power Adm # 4 & 5	X		
SERC	X		
Bill Reinke SERC 2			
John Stickley AECI 1			
John Troha SERC 2			
Terri M. Kuehneman SRP #3	X		
Tony Jankowski We Energies # 4	X		
William J. Smith Allegheny Power #1	X		
Gerald Rheault Manitoba Hydro # 1,3,5,6	X		

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Kathleen Bauer Northwestern Energy	X		
<u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6 Joe Roos Ocala Electric Utility #3 Steve McElhaney FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shipps Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3			We are unsure why the particular reference to "loss of facilities". That seems to be a very specific situation and we wonder why would that need to be singled out over many other emergency conditions that could be just as important.
Industry consensus supports the inclusion of this requirement.			
Joseph J. Krupar Florida Municipal Power Agency # 3		X	The words "due to the loss of facilities" should be removed. A plan is needed to provide continued operation during any abnormal and emergency conditions.
Industry consensus supports the inclusion of this requirement.			

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24. Is the revised SAR missing any requirements?

Commenter	Yes	No	Comments
Ed Riley California ISO # 2	X		De-certification Process for a "bad actor".
Non-compliance penalties are an issue for the Compliance & Certification Committee and are not being addressed as part of this SAR.			
CenterPoint Energy #1 Richard Sikes John Jonte Wayne Kemper Dennis Caufield James Hayes Glenn Hemperley Brad Calhoun	X		Data Acquisition and System Analysis Items 5.1, 5.4.3 & 5.4.4 need adjustments. 5.1-Include frequency and NIC in/out for ID of sep.&rest., 5.4.3-In coord.with the RA.5.4.4-Delete
The details of the requirement will be defined in the Standard. These could include frequency, net interchange, and any other elements determined by reliability standards that are developed. The identified elements will be forwarded to the Standard Drafting team to consider for inclusion in the standard			
The coordination that is being requested should be a part of the intent under 5.5 in the criteria which states "Process/procedures in place for coordinating with other transmission operators and their reliability authority."			
The issue of applicability of 5.4.4 relating to control of DC ties will be forwarded to the Standard drafting team for resolution to ensure that this certification requirement is only imposed on those TOPs who have such facilities.			
Darrel W. Richardson Illinois Power Company # 1,3	X		This does not cover de-certification for anything other than if requested by the certified party. Also, if Certification Criteria 5.7 states that you will be compliant with all NERC reliability standards and "Operate within Limits" is a standard then what is the need for Certification Criteria 5.4.2 and 5.4.3?
Non-compliance penalties are an issue for the Compliance & Certification Committee and are not being addressed as part of this SAR.			
Certification ensures the ability to perform while Compliance measures performance. It may be possible that criteria for certification are replaced as other reliability standards are developed.			
Joseph J. Krupar Florida Municipal Power Agency # 3	X		In comments on version 1 of this SAR I stated that this SAR should be limited to Transmission Operators that operate the bulk electric power system. The response was non-responsive and unacceptable - stating the criteria that was used in determination of certification requirements were based on concepts of the Functional Model. Just because the Transmission Operator Function in the NERC Functional Model does include responsibility for local reliability functions does not mean that all Transmission Operators need to be NERC Certified. The Functional Model was a method of breaking down the functions that a

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		<p>control area performed to its basic functions. There are some control areas that only have local transmission and from a NERC bulk electric power system prospective should not have to be certified as a Transmission Operator. Also an entity that owns and operates a few miles of radial transmission serves transformers for the distribution system should not have to be a NERC Certified Transmission Operator. If all Transmission Operators need to be certified then the NERC Functional Model needs to be changed to only have the functions that affect bulk electric power system.</p> <p>In section 5.4 of certification criteria, the term "local network integrity" should be changed to "bulk electric power system integrity". NERC should be making standards for only the bulk electric power system not each local network.</p>
<p>The certification criteria does not define what a Transmission Operator is, but rather it identifies the criteria that an entity must meet in order to be a Certified Transmission Operator. As stated in the Introduction of the criteria, the basis for the certification criteria includes the Functional Model which identifies that the functions are for the operation of the Bulk Electric System. This linkage should prevent the inclusion of entities that are not intended to be a part of the certified target audience.</p>		
<p>George Bartlett Ed Davis Entergy Services, Inc # 1</p>	<p>X</p>	<p>There are several issues that are addressed in this catchall section. It seems the Applicant has significant input to the selection of the Review Team and the Applicant should be added to the Region under the "Formation of Certification Review Team – Region & Applicant", page SAR-2. The last statement of Section 10 states the Region may elect, with Applicant agreement, to engage a completely independent Review Team. We suggest the Applicant have the ability to elect this route also with words added as follows: "the Region may elect with Applicant agreement, or the Applicant may elect, to engage a completely independent Review Team".</p>
<p>The intent for the inclusion of the option for the Region to utilize a completely independent review team was to provide options for the Region to handle the workload of completing all of the certifications that are anticipated. There was never the intent to allow the applicant to select their own review team that would be the case if this option were provided to the applicants. The applicant only has approval rights for the review team, not selection.</p>		
<p><u>FRCC Operating & Engineering Committees</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 Richard Gilbert Lakeland Electric #3 Marty Mennes Florida Power & Light Co #1 Douglas Bullock PG & E #6</p>	<p>X</p>	<p>3.1 requires NERC certified system operators performing the Transmission Operator responsibilities, but does not really define what level of certification that is needed. Now that there are more than one test for operators to take, this requirement should be revised to be more specific to what certification credential is required for performing the TOP function.</p> <p>In the definition of the TOP function, the TOP should monitor, assess</p>

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<p>Joe Roos Ocala Electric Utility #3 Steve McElhaneey FL Municipal Pwr Agency #5 Robert Miller Kissimmee Utility Auth #3 Paul Shippis Lakeland Electric #3 Rusty Foster City of Tallahassee #3 Mark Bennett Gainesville Regional Util #5 Bob Remley Clay Electric Cooperative #4 John Giddens Reedy Creek Impr District #3 Ted Hobson JEA #1 Eric Grant Progress Energy, Florida #1 Chuck Harper Progress Energy, Florida #1 Amy Long Lakeland Electric #3 Greg Ramon Tampa Electric Company #1 Ron Donahey Tampa Electric Company #3 Ben Sharma Kissimmee Utility Authority #3 Steve Wallace Seminole Electric Coop #4 Joe Krupar FL Municipal Power Agency #3</p>			<p>AND maintain local reliability, not just monitor and assess. Also, the TOP may be performing switching needed for their own local system, not just in support of (or approved by) the RA as long as it does not negatively impact the grid.</p> <p>Requirements for communication systems and tools, especially between the TOP and RA seem to be missing and should be added. This would be especially important during emergency situations.</p>
<p>Specific details of the appropriate certification exam for operating personnel should be defined in the Standard drafting process.</p> <p>Although the definition does not specifically state that the TOP must maintain reliability, subsequent criteria does address this responsibility.</p> <p>5.3 states that tools must be in place to provide transmission system information, in real-time, to the appropriate authorities. This would include communications with the RA.</p>			
<p>Raj Rana AEP #1,3,5,6</p>	<p>X</p>		<p>1. A dispute resolution process to resolves issues such as when multiple regions do not agree, 2) No need for certifying an organization to be a transmission operator.</p>
<p>Dispute Resolution procedures exist for NERC and each of the Regions and are identified in step #18 of the procedure. These processes can be utilized to resolve any issues that arise from the certification process.</p> <p>Industry consensus supports the certification of entities performing the Transmission Operator function.</p>			
<p>JRAnderson Consumers Energy Co. # 3</p>	<p>X</p>		<p>Did not know where to specifically place the following responses as none of the above questions addressed them.</p> <p>A. <u>NERC Certification of the System Operators in the Personnel section.</u> If statement 3.1 is taken literally, that all system operators would have to be NERC certified, it is a requirement that will add significant cost of which current tariffs do not</p>

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		<p>cover and provide no operational benefit. If this statement can be interpreted such that system operators who work under the direction of other senior NERC certified personnel, then the requirement is much less onerous and provides sufficient certified leadership and guidance. From an operational standpoint, operators working under the direction of a NERC certified senior/lead operator seems more than sufficient. Consumers Energy does not support requiring ALL system operators to be NERC certified.</p> <p>B. It also appears that the development of a Certification process seems premature when the Standards for which such would be based on have not yet been solidified.</p>
<p>Specifics associated with the personnel certification will be defined during the Standard drafting process.</p>		
<p>Industry consensus supports the current development of Certification for entities identified in the Functional Model. Development of future Standards would be enforced through the Compliance programs.</p>		
<p><u>Transmission Subcommittee</u> Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Thomas Mallinger Midwest ISO Darrick Moe Western Area Power Administration Scott Moore American Electric Power Bill Slater Florida Power Corporation Thomas Stuchlik Western Resources Joseph Stylinger Southern Wholesale Energy David Thorne K.H. Thorne Consultants Inc. Robert Waldele New York ISO John Ahr Alleghany Power Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Thomas Vandervort NERC</p>	<p>X</p>	<p>This is the only place on the Comment Form to voice general comments. See below.</p> <p>1) Process Step #10, potential review team members need to be qualified to perform the TOP Certification review assessment. Questions 8 and 9 asked about the NERC Representative and the Regional Staff – Review Team members. However, a general statement of the qualifications of the individuals is necessary. Simply having a employee or designated individual from the Process Step #10 categories does not satisfy the TS. These individuals need to be qualified to perform the review and make sound recommendations. The TS recommends the SAR add a personnel qualification statement in Process Step #10.</p> <p>2) The TS does not think the TOP, BA, IA or RA certifications should be standards. The certification process is just that – a “process.” Processes do not affect the reliability of the bulk transmission system. The TS recommends the Certification Processes be developed into Procedures. This includes certification, re-certification, and de-certification processes be developed into Procedures – not Reliability Standards. The TS hopes the SAR process is used to only start the certification process rolling and the next step will be to develop “Certification Procedures” and not Reliability Standards.</p>

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It is agreed that the individuals serving on the review team should be qualified to serve in the role. It is the responsibility of the Region to ensure that the individuals on the review team are qualified to participate. With the provision that the applicant must approve the review team members, the applicant also has a review to ensure that the individuals are qualified.

The industry does support the need for certifying the RA, BA, IA, and TOP. The criteria that is used for determining if an entity is certified needs to be a Standard and is supported by the industry. The issue related to the procedures being a part of the SAR and proceeding in the Standard has been debated and the industry consensus obtained supports the current SAR.

<p>CP9, NPCC Reliability Standards Working Group</p> <p>David Kiguel Hydro One Networks #1</p> <p>Dan Stosick ISO-New England #2</p> <p>Mike Schiavone Niagara Mohawk #1</p> <p>Barry Gee National Grid USA #1</p> <p>Dave Little Nova Scotia Power #1</p> <p>Jim Ingleson New York ISO #2</p> <p>David Little New Brunswick Power #1</p> <p>Greg Campoli New York ISO #1</p> <p>Ralph Rufrano New York Power Authority #1</p> <p>Roger Champagne HydroQuebec TransEnergie #1</p> <p>Jerry Mosier NPCC #2</p> <p>Guy Zito NPCC #2</p>	<p>X</p>	<p>If there are multiple entities who wish to achieve the TOP certification for a given area, who and how should the certification be granted?</p> <p>Criterion for selection of TOP certification when multiple applications for TOP are received for a given area.</p>
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The criteria address the requirements for gaining certification. The issues of competing organizations wishing to perform the same function for the same area is a business issue that will be addressed by the Transmission Owner(s)

<p>Roger D Green</p> <p>Southern Company Services - SOCO Generation</p> <p># 5</p>	<p>X</p>	<p>Section 2 under Certification Criteria should be revised to specifically include interface agreements with Generators so the Generators will have input on critical operational requirements such as mutually agreed upon voltage schedules, transmission voltage limitations for starting station service and shutdown (particularly for nuclear plants), operation of power system stabilizers, control of supplementary reactive sources (capacitor and reactor banks in plant switchyards), etc.</p> <p>Section 5 titled Data Acquisition and System Analysis: Need to add "5.7 Process/procedures in place for coordinating with generator operators." (This requirement would parallel 5.5 which requires coordination with adjacent TOs.) This is a must for nuclear plants in order to ensure appropriate notifications are made to nuclear plant operators and appropriate operational studies and contingency analyses of the nuclear plant offsite power source are performed. The</p>
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			SARDT stated in its response to questions for the 1 st Posting that 5.2 and 5.3 were intended to cover this. We disagree and believe that further clarification is warranted. 5.2 only addresses the TO processes/procedures and tools for <u>obtaining</u> information from <u>generators</u> (<u>one-way</u> flow of information). Coordination with <u>generator operators</u> involves <u>two-way</u> comprehensive communication, mutually agreeable terms and understanding, and places responsibility on <u>both</u> parties to supply each other with necessary information. 5.3 only addresses the flow of information from the TO <u>upward</u> to authorities.
<p>If there are specific requirements for a particular type of generation, it will be handled outside of this certification criteria. There was not enough industry support to include agreement requirements between the TOP and Generators.</p> <p>The coordination and exchange of information between TOPs and Generators are covered under 5.2 and will be further defined in the Standard drafting process.</p>			
<p><u>Southern Co. Generation & Energy Marketing #3,5,6</u> Roman Carter Joel Dison Lucius Burris Clifford Shepard Lloyd Barnes Michael Smith Tony Reed</p>	X		<p>Under Section 2 of the Certification Criteria, there should be a requirement for an agreement between the TOP and Generators. Generators should have input on critical operational requirements such as voltage schedules, and voltage limitations for starting station service and shutdown.</p>
<p>There was not enough industry support to include agreement requirements between the TOP and Generators.</p> <p>The coordination and exchange of information between TOPs and Generators are covered under 5.2 and will be further defined in the Standard drafting process.</p>			
<p>Carter B. Edge Southeastern Power Administration # 4 & 5</p>	X		<p>Unable to determine due to the changing topography of the NERC Functional Model.</p>
<p><u>SERC</u> Bill Reinke SERC 2 John Stickley AECI 1 John Troha SERC 2</p>	X		<p>The steps to certify TOPs should be called a Procedure instead of a Standard. The Certification Process should have its own formal due process so that it is separate and removed from the Standards Process. This will allow references to established Standards and will offer adequate flexibility to make the proper certification process modifications when necessary.</p> <p>The last statement of Section 10 states the Region may elect, with Applicant agreement, to engage a completely independent Review Team. We suggest the Applicant have the ability to elect this route also with words added as follows: "the Region may elect with Applicant</p>

Summary of Comments on Second Posting of Transmission Operator Certification SAR

			agreement, or the Applicant may elect, to engage a completely independent Review Team.
<p>The issue related to the procedures being a part of the SAR and proceeding in the Standard has been debated and the industry consensus obtained supports the current SAR.</p> <p>The intent for the inclusion of the option for the Region to utilize a completely independent review team was to provide options for the Region to handle the workload of completing all of the certifications that are anticipated. There was never the intent to allow the applicant to select their own review team that would be the case if this option were provided to the applicants. The applicant only has approval rights for the review team, not selection.</p>			
Peter Burke for Paul Steinberger ATC #11		X	<p>In #7 it specifies the recipients of questionnaires and related documents. It does not mention the Interchange Authorities. Then in # 10 the Interchange Authority is invited to participate on the Review Team. Is there a reason they were left out in #7?</p> <p>In #9 the specification is made for the Review Team will subject themselves to confidentially agreements. Different entities have different means to address (and sometime not until the need arises) and this could be a problem for a Review Team member who works for a company that does not have a agreement in place. This has and can be a stick issue. Is there a way to have NERC blanket cover this issue?</p> <p>In #15 it might be important to consider adding a reasonable response time for the Region approval. A particular Region may be bogged down in a local problem and not give a timely response for something they consider less an issue.</p>
Gordon Pietsch Great River Energy # 1		X	
Geoff Elmer IMO # 2		X	
James R. Regg Tennessee Valley Authority # 1		X	
Joanne K. Borrell FirstEnergy Solutions # 3		X	
Edward C. Stein FirstEnergy Solutions # 6		X	
<u>Southern Company Transmission #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Brian Mitchell Southern Co Bill Botters Southern Co Bill Pope Gulf Power Company		X	

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Mike Miller Southern Co			
John Clark Southern Co			
Chris Wakefield Southern Co			
Keith Comeaux Cleco Power LLC # 1		X	
Ken Githens Allegheny Energy Supply # 5		X	
Kenneth Skroback Alabama Electric Coop # 4		X	
Ray Morella FirstEnergy Corp # 1		X	
Terri M. Kuehneman SRP #3		X	
William J. Smith Allegheny Power #1		X	
Gerald Rheault Manitoba Hydro # 1,3,5,6		X	
MAPP Reliability Council (Lloyd Linke) #2		X	
Alan Boesch NPPD #1		X	
Dan Kay South Mississippi Electric Pwr Assoc #3		X	
Kathleen Bauer Northwestern Energy	X		There are concerns that while we believe NERC will continue to implement the various 'authorities', the effort is using too many resources to accomplish too little benefit. In addition, the concept ignores formation of RTOs that function much like a traditional control area (albeit without owning generation) and encompass several 'authorities' such as the reliability authority, balancing authority, transmission authority, etc. It is difficult to see a purpose for changes in the certification process with all the other changes taking place in our industry. Time and resources would be better spent on developing better reliability standards. Analysis should be done on how the review teams will be funded. Also, cost/benefit studies should illustrate that the benefits of instituting this program far outweigh the time and effort to develop and implement the process. If it isn't too late, this type of analysis has to be done.
Industry consensus supports the development of the certification criteria and procedures. RTOs may identify themselves as performing different functions and the Functional Model has been developed to allow flexibility in the development of these different organizations.			