

Consideration of Comments on Initial Ballot of Version 1 Risk Factors – Emergency Operations, Voltage Control and Transmission Operations

Summary Consideration: While several commenters made suggestions to change one or more of the ratings, there was no consensus to change any one of the ratings, therefore, no changes were made to the violation risk factors for this set of requirements.

Organization:	Baltimore Gas & Electric Company
Member:	John J. Moraski
Comment:	BGE feels that the structure of the voting on risk factors needs to be changed to allow voting on each factor, as opposed to the grouping of the factors as presented. If we disagree with a single factor, we are forced to vote negative on all factors.
Response: Most stakeholders seemed to support the format of the ballot. This comment does not identify any violation risk factor that you feel needs to be modified.	
Organization:	Dairyland Power Coop.
Member:	Robert W. Roddy
Comment:	Please confirm that this is an initial work effort and that there will be an opportunity to make modifications to the Violation Risk Factors in the 3 year work plan. If you could confirm that, we would consider voting "yes" on the re-circulation ballots.
Response: The violation risk factors will be reviewed in the future as part of the Reliability Standards Development Plan 2007-2009.	
Organization:	Entergy Corporation
Member:	George R. Bartlett
Comment:	Entergy Transmission believes that several of the VFRs have been rated too high. HIGH should be given to Requirements that directly impact the real-time operations of the bulk electric system. MEDIUM should pertain to those Requirements that prepare an entity for real-time operation, and LOWER for those that are of a reporting nature. The V1 VFRs for the Requirements for which we have concerns were listed in our comments to the ballot pool on 2-9-07. Thank you.
Response: The drafting team reviewed all the comments submitted with the V1 VFRs during the public comment period. The VFRs posted for ballot represented the consensus of stakeholders, based on the ratings selected by stakeholders during the public comment period. There was no consensus to modify the VFRs identified in the comments you submitted.	
Organization:	Great River Energy
Member:	Gordon Pietsch
Comment:	GRE feels that many of the violation risk factors are not based on the risk as currently defined, but rather on the importance of the requirements. GRE would consider voting affirmatively on the re-circulation ballot if the committee confirms that review/modification of the risk factors can occur in the future.
Response: The violation risk factors will be reviewed in the future as part of the Reliability Standards Development Plan 2007-2009.	
Organization:	Minnesota Power, Inc.
Member:	Carol Gerou
Comment:	EOP-005-1 R11.5.3 Should be assigned as "high", coordination with adjacent areas is imperative to maintaining stability of weak systems.
Response: The VFRs posted for ballot represented the consensus of stakeholders, based on the ratings selected by stakeholders during the public comment period. There was no consensus to change the rating of EOP-005-1 R11.5.3.	
Organization:	PP&L, Inc.
Member:	Ray Mammarella

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Comment:	EOP-05 should be given a high priority for safety reasons.
Response:	The VRFs posted for ballot represented the consensus of stakeholders, based on the ratings selected by stakeholders during the public comment period. Note that there EOP-005 R11 and many of its sub-requirements do have a 'HIGH' rating. The criteria for establishing violation risk factors is linked to reliability, not to safety, and making changes to the criteria for setting the risk factors is outside the scope of the drafting team.
Organization:	Midwest ISO, Inc.
Member:	Terry Bilke
Comment:	We want the ERO to be successful and have the tools necessary for a quality compliance program. We agree with the NERC Operating Committee that that the risk factors are weighted too highly. The survey mechanism and current process really are more a measure of perceived importance of the standard than the true risk to the Interconnection. Risk factors were also applied to explanatory text that was never intended to be measured. The standards need to be reformatted to separate the true core requirements from the administrative and explanatory text. Risk factors need to be assigned based on risk of causing cascading failures.
Response:	This comment does not identify any violation risk factor that you feel needs to be modified. The violation risk factors will be reviewed in the future as part of the Reliability Standards Development Plan 2007-2009.
Organization:	PJM Interconnection, L.L.C.
Member:	Tom Bowe
Comment:	<p>PJM does not believe that the following EOP requirements (and sub-requirements should be ranked HIGH. Since the entity is already in a disturbance, failure to take these actions will not cause a blackout. These are important statements but should only be rated MEDIUM.</p> <p>EOP-005-1 R11. Following a disturbance in which one or more areas of the Bulk Electric System become isolated or blacked out, the affected Transmission Operators and Balancing Authorities shall begin immediately to return the Bulk Electric System to normal.</p> <p>EOP-005-1 R11.2. The affected Transmission Operators and Balancing Authorities shall take the necessary actions to restore Bulk Electric System frequency to normal, including adjusting generation, placing additional generators on line, or load shedding.</p> <p>EOP-005-1 R11.3. The affected Balancing Authorities, working with their Reliability Coordinator(s), shall immediately review the Interchange Schedules between those Balancing Authority Areas or fragments of those Balancing Authority Areas within the separated area and make adjustments as needed to facilitate the restoration. The affected Balancing Authorities shall make all attempts to maintain the adjusted Interchange Schedules, whether generation control is manual or automatic.</p> <p>EOP-005-1 R11.4. The affected Transmission Operators shall give high priority to restoration of off-site power to nuclear stations.</p> <p>EOP-005-1 R11.5.1. Voltage, frequency, and phase angle permit.</p> <p>EOP-005-1 R11.5.2. The size of the area being reconnected and the capacity of the transmission lines effecting the reconnection and the number of synchronizing points across the system are considered.</p> <p>EOP-005-1 R11.5.4. Load is shed in neighboring areas, if required, to permit successful interconnected system restoration.</p>

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Response: The VRFs posted for ballot represented the consensus of stakeholders, based on the ratings selected by stakeholders during the public comment period. While the drafting team received several suggestions for changes to individual ratings, there was no consensus to change any single rating.

Organization: Constellation Energy

Member: Carolyn Ingersoll

Comment: In our review of these Version 1 VRF we have found instances where we feel that the ratings inappropriately group certain requirements into the Medium or High risk factor subgroups, and in light of the fact that the ratings applied to each Requirement cannot be voted on individually we voted against the entire package of standards. In conclusion, we are requesting that the standards drafting team allow participants to vote on individual requirements.

Response: Most stakeholders seemed to support the format of the ballot. This comment does not identify any violation risk factor that you feel needs to be modified.

Organization: Constellation Generation Group

Member: Michael F. Gildea

Comment: In our review of these Version 1 VRF we have found instances where we feel that the ratings inappropriately group certain requirements into the Medium or High risk factor subgroups, and in light of the fact that the ratings applied to each Requirement cannot be voted on individually we voted against the entire package of standards. In conclusion, we are requesting that the standards drafting team allow participants to vote on individual requirements.

Response: Most stakeholders seemed to support the format of the ballot. This comment does not identify any violation risk factor that you feel needs to be modified.

Organization: Dairyland Power Coop.

Member: Warren Schaefer

Comment: Please confirm that this is an initial work effort and that there will be an opportunity to make modifications to the Violation Risk Factors in the 3 year work plan. If you could confirm that, we would consider voting "yes" on the re-circulation ballots.

Response: The violation risk factors will be reviewed in the future as part of the Reliability Standards Development Plan 2007-2009.

Organization: PPL Generation LLC

Member: Mark A. Heimbach

Comment: I do not believe that the following EOP requirements (and sub-requirements should be ranked HIGH. Since the entity is already in a disturbance, failure to take these actions will not cause a blackout. These are important statements but should only be rated MEDIUM.

EOP-005-1 R11. Following a disturbance in which one or more areas of the Bulk Electric System become isolated or blacked out, the affected Transmission Operators and Balancing Authorities shall begin immediately to return the Bulk Electric System to normal.

EOP-005-1 R11.2. The affected Transmission Operators and Balancing Authorities shall take the necessary actions to restore Bulk Electric System frequency to normal, including adjusting generation, placing additional generators on line, or load shedding.

EOP-005-1 R11.3. The affected Balancing Authorities, working with their Reliability Coordinator(s), shall immediately review the Interchange Schedules between those Balancing Authority Areas or fragments of those Balancing Authority Areas within

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	<p>the separated area and make adjustments as needed to facilitate the restoration. The affected Balancing Authorities shall make all attempts to maintain the adjusted Interchange Schedules, whether generation control is manual or automatic.</p> <p>EOP-005-1 R11.5.1. Voltage, frequency, and phase angle permit.</p> <p>EOP-005-1 R11.5.2. The size of the area being reconnected and the capacity of the transmission lines effecting the reconnection and the number of synchronizing points across the system are considered.</p> <p>EOP-005-1 R11.5.4. Load is shed in neighboring areas, if required, to permit successful interconnected system restoration.</p>
<p>Response: The VRFs posted for ballot represented the consensus of stakeholders, based on the ratings selected by stakeholders during the public comment period. While the drafting team received several suggestions for changes to individual ratings, there was no consensus to change any single rating.</p>	
Organization:	Constellation Energy Commodities Group
Member:	Donald Schopp
Comment:	In our review of these Version 1 VRF we have found instances where we feel that the ratings inappropriately group certain requirements into the Medium or High risk factor subgroups, and in light of the fact that the ratings applied to each Requirement cannot be voted on individually we voted against the entire package of standards. In conclusion, we are requesting that the standards drafting team allow participants to vote on individual requirements.
<p>Response: Most stakeholders seemed to support the format of the ballot. This comment does not identify any violation risk factor that you feel needs to be modified.</p>	
Organization:	Southwest Power Pool
Member:	Charles H. Yeung
Comment:	These rankings do not reflect the intent of the definitions provided by the rankings. The importance of a standard to the reliability of the grid is not the same as that standard's risk factor. It seems like these rankings reflect the importance and not the risk.
<p>Response: The VRFs posted for ballot represented the consensus of stakeholders, based on the ratings selected by stakeholders during the public comment period.</p>	