

Comments on:

***Overall –***

Dominion supports the comments of the Edison Electric Institute (EEI) in this proceeding. In particular, Dominion agrees with EEI's suggestion that NERC consolidate the definitions used in the various Rules of Procedure documents and associated appendices and that NERC undertake a careful review of the documents to ensure that all "definition" and "glossary" sections have been appropriately consolidated. Such a consolidation would aid in preventing inconsistencies among definitions. Further, a coordinated NERC effort to harmonize these documents and develop consistent definitions would assist NERC stakeholders as they review draft CANS, and Reliability Standards, as well as future edits to the Rules of Procedure. Throughout these comments, Dominion has made an effort to point out instances where definitions are repeated across the various documents.

***Rules of Procedure of the North American Electric Reliability Corporation section 100-1600***

Given that most of the proposed revisions are to use capital letters to denote defined terms, Dominion suggests that within the document "***Rules of Procedure of the North American Electric Reliability Corporation***" references to the "Rules of Procedure" use italics or some other indicator to show that it is not a defined term but is a reference the document itself.

Section 100 – In 3rd and 4<sup>th</sup> paragraphs – Rules of Procedure should not be capitalized given that the term is not defined.

Section 302 –The term 'market operator' is not included in [Appendix 2](#) or the [Glossary of Terms Used in NERC Reliability Standards](#), but exists in [NERC Reliability Functional Model Version 5](#).

***Rules of Procedure, Appendix 2 –***

Page 1-- The proposed definition of "Adequate Level of Reliability" raises additional questions. The definition lists several characteristics of the Bulk Power System, including inclusion of the words "the Bulk Power System's integrity can be restored promptly if it is lost..." However, Appendix 2 does not define or set parameters for restoring the integrity. Specifically, how does NERC define "promptly"?

NERC also references the following characteristic off the BPS: "the aggregate electric power and energy requirements of the electricity consumers at all times". The words "at all times" should be dropped or qualified to exclude unforeseen events and acts of God, such as hurricanes and earthquakes.

### ***Appendix 3A Standard Processes Manual***

Page 5 –Reliability Standard should not be defined here given it is included in [Appendix 2](#). We therefore suggest removal of the paragraph defining it.

Page 6 – Under ‘Measure:’ Dominion suggests that “Evidence Retention’ and ‘Time Horizon’ not be capitalized as they are not included in [Appendix 2](#) or the [Glossary of Terms Used in NERC Reliability Standards](#). We also note that ‘Compliance Enforcement Authority’ is defined in [Appendix 2](#) and suggest that the term not be defined here.

Page 7 – ‘Violation Risk Factor’ and ‘Violation Severity Level’ is defined in [Appendix 2](#) and suggest that the term not be defined here.

Page 9 – ‘Standard Authorization Request’ should not be capitalized as it is not included in [Appendix 2](#) or the [Glossary of Terms Used in NERC Reliability Standards](#).

Page 10 – ‘Compliance Monitoring and Enforcement Program’ is defined in [Appendix 2](#) , therefore Dominion suggests that the term not be defined here.

Page 14 - ‘Standard Authorization Request’ should not be capitalized as it is not included in [Appendix 2](#) or the [Glossary of Terms Used in NERC Reliability Standards](#).

Page 24 – footnote 22 – ‘Glossary of Terms’ should be replaced with the actual title of the document [Glossary of Terms Used in NERC Reliability Standards](#).

Page 29 – ‘Interpretation’ is capitalized in some instances, but not in others.

### ***Appendix 3B Election Procedure for Members of the NERC Standards Committee***

Page 4 - references to the ‘Standard Processes Manual’ should be in italics, or some other indicator should be used to indicate that this is not a defined term but is the reference to the document itself.

### ***Appendix 4A - Audit of Regional Entity Compliance Programs***

Page 2- ‘Compliance Monitoring and Enforcement Program Implementation Plan’ should not be capitalized as only a portion (Compliance Monitoring and Enforcement Program) is included in [Appendix 2](#) or the [Glossary of Terms Used in NERC Reliability Standards](#).

### ***Appendix 4B - Sanction Guidelines of the North American Electric Reliability Corporation***

Page 15 – Section 4.1.1, 3<sup>rd</sup> sentence. Dominion suggests that Lower, Medium and High not be capitalized when used with Violation Risk Factor as these words are not defined terms included in [Appendix 2](#).

Sections 4.3.5 through 4.3.7 – Dominion suggests that when referring to the FERC Policy Statement on Enforcement, the document should include italics, a footnote citation or some other indicator that this is not a defined term but rather a reference to a Federal Energy Regulatory Commission order.

Page 22 - Dominion does not believe that the term Remedial Action Directive should be defined here given it is included in [Appendix 2](#). We therefore suggest removal of the sentence defining it.

***Appendix 4C - North American Electric Reliability Corporation Compliance Monitoring and Enforcement Program***

Page 24 – Dominion suggests that ‘Compliance Program’ and ‘Implementation Plan’ not be capitalized as they are not included in [Appendix 2](#) or the [Glossary of Terms Used in NERC Reliability Standards](#).

Section 4.2 – Dominion suggests that ‘Regional Implementation Plan’ not be capitalized as it is not included in [Appendix 2](#) or the [Glossary of Terms Used in NERC Reliability Standards](#).

***Appendix 4D - PROCEDURE FOR REQUESTING AND RECEIVING TECHNICAL FEASIBILITY EXCEPTIONS TO NERC CRITICAL INFRASTRUCTURE PROTECTION STANDARDS***

No comments

***Appendix 5A - Organization Registration and Certification Manual***

Page 8 – Dominion suggests that the term ‘Rules of Procedure Section 500 and Section V of Appendix 5’ be denoted by italics or some other indicator that it is not a defined term but rather a reference to a specific document.

Page 11 @ 7 – Dominion suggests that the word ‘web’ not be capitalized as it is not included in [Appendix 2](#) or the [Glossary of Terms Used in NERC Reliability Standards](#).

Page 14 @ 21 – Dominion suggests that the term ‘Compliance Registry’ be denoted by italics or some other indicator that it is not a defined term but rather a reference to a specific document.

***Appendix 5B - Statement of Compliance Registry Criteria***

Page 5 – given ongoing work of Project 2010-17, Dominion suggests removal of the paragraph that defines the Bulk Electric System.

Pages 6 & 7 – The List of function types does not match [Reliability Functional Model Version 5](#).

Page 8 Section III – Dominion suggests

that 'Compliance Registry' use italics or some other indicator that it is not a defined term but is a reference.

Pages 8 through 10 - Dominion suggests that paragraphs in section III containing exclusion language be modified consistently so that cited reference documents use italics or some other indicator that it is not a defined term.

Page 11 – Dominion suggests that 'Compliance Registry', 'Order No. 693', and Sections 500, 501 and 507 of the 'NERC Rules of Procedure' use italics or some other indicator that these are not defined terms but are references.

### ***Appendix 6 -System Operator Certification Program Manual***

Page 7 – Dominion suggests that 'Content Outline' use italics or some other indicator that it is not a defined term but is a reference.

Page 10 – Dominion suggests that 'Program Manual' use italics or some other indicator that it is not a defined term but is a reference.

Page 11 – Dominion suggests that 'System Operator Certification Program' use italics or some other indicator that it is not a defined term but is a reference.

Page 16 - Dominion suggests that 'Continuing Education Program Provider's' use italics or some other indicator that it is not a defined term but is a reference.

Page 20 - Dominion suggests that 'Provider' not be capitalized as it is not a defined term or the use of italics or some other indicator if a reference.

Page 25 - Dominion suggests that 'System Operator Certification' not be capitalized as it is not a defined term or the use of italics or some other indicator if a reference.

Page 26 - Dominion suggests that 'Credential Review Task Force' not be capitalized as it is not a defined term or the use of italics or some other indicator if a reference.