



October 17, 2011

To: [ROPcomments@nerc.net](mailto:ROPcomments@nerc.net)

Re: Proposed Appendix 2 to the NERC Rules of Procedure

FirstEnergy supports the new Appendix 2 for terms used in the NERC Rules of Procedure (RoP). This provides for a central location for the terms which are currently spread throughout the individual sections of the RoP.

We offer the following comments and suggestions for improvements to the proposed Appendix 2:

1. Compliance Enforcement Authority (pg. 4) – Although we agree with this definition, it should also be duplicated in the NERC standards glossary of terms since it is a term that is used in the NERC reliability standards.
2. Critical Infrastructure Protection Standard (pg. 6) – Reference made to CIP-002 through CIP-009 should be more general such as “the CIP suite of standards” since the Order 706 Drafting Team is proposing two additional CIP standards, CIP-010-1 and CIP-011-1.
3. Delegate (pg. 6) – within the definition of Delegate, reference is made to a specific requirement within Version 1 of CIP-003. Since the CIP standards are currently on version 3, with versions 4 and 5 on the horizon, this reference to version 1 is outdated. And due to the constant change in standard versions, the reference in this and other definitions should be general. Therefore, we suggest that the phrase “Requirement 3.2 of CIP standard CIP-003-1” be changed to “the requirements in the NERC cyber security standards (CIP)”.
4. Entity Variance (pg. 7) – The phrase “NERC Standards Development Procedure” should be changed to the new title of the document which is “NERC Standard Processes Manual”.
5. Interpretation (pg. 9) – We suggest adding the phrase “developed in accordance with the NERC Standards Process Manual” to this term to make a tie to the process of developing interpretations.
6. Planning Authority (pg. 12) – It may be helpful if the definition made mention to the fact that the Planning Authority is also commonly referred to the Planning Coordinator in NERC reliability standards.

7. Protection System (pg. 13) – This term, which is used in the NERC reliability standards, has been revised and approved by the NERC Board of Trustees in November 2010 and is currently under FERC review. We suggest this term in the RoP be made consistent with the new definition which states:
- Protective relays which respond to electrical quantities,
  - Communications systems necessary for correct operation of protective functions
  - Voltage and current sensing devices providing inputs to protective relays,
  - Station dc supply associated with protective functions (including batteries, battery chargers, and non-battery-based dc supply), and
  - Control circuitry associated with protective functions through the trip coil(s) of the circuit breakers or other interrupting devices.
8. Regional Entity (pg. 13) – We suggest two improvements for this term.
- a. Suggest that the phrase “pursuant to 18 C.F.R. § 39.8” be further clarified so that the reader is not forced to track down this clause.
  - b. This term should be added to the NERC Standards Glossary of Terms

FirstEnergy appreciates NERC taking the time to consider our suggestions.

Sincerely,

Sam Ciccone  
Sr. Compliance Specialist  
FirstEnergy Corp.  
76 S. Main St.  
Akron, Ohio 44308  
330-252-6383  
[sciccone@firstenergycorp.com](mailto:sciccone@firstenergycorp.com)