

LG&E and KU Energy based in Louisville, KY submit the following comments on the proposed changes to the Rules of Procedure:

LG&E and KU Energy support the goal of NERC to provide a more comprehensive listing of definitions contained in the Rules of Procedure, but the proposal in Appendix 2 is incomplete and creates some uncertainty. By not addressing these concerns, NERC is ignoring the statement made in the Reliability Functional Model – Version 5, that consistency is needed “between the Model and the NERC Glossary, the Rules of Procedure (ROP) and Reliability Standards. Inconsistency has potential for creating needless complexity, confusion and wasted effort for those who use NERC documents.” (NERC Reliability Functional Model – Version 5, p. 4.)

There are at least four issues that need to be addressed before the proposal becomes final. First, some definitions simply reference another section of the ROP and do not contain the actual definition. For example, “‘Advisories’ or ‘Level 1 Advisories’ has the meaning set forth in Section 810.3.1 of the Rules of Procedure.” NERC should incorporate the actual definition of these terms because it would better accomplish the purpose of the Proposed Appendix 2 of having a single reference for all included definitions. Otherwise, stakeholders still have to go to another location to find the definition. In light of NERC’s stated purpose for this change, this would be counterproductive. Second, while NERC has taken some steps to reference the definitions’ origins, some definitions have no reference. For example, “‘Alleged Violation’ means a Possible Violation for which the Compliance Enforcement Authority has determined, based on an assessment of the facts and circumstances surrounding the Possible Violation, that evidence exists to indicate a Registered Entity has violated a Reliability Standard.” All definitions should have either a reference citing the definition source or the note stating that it is a new definition. Again, this would better accomplish NERC’s stated purpose of having a single reference for all definitions by giving stakeholders the primary source for the definition.

Third, while the NERC Reliability Standards Glossary terms are rightly incorporated into the Proposed Appendix 2 Glossary, there is nothing stating which definition governs if the Standards Glossary definition changes. Since the Standards Glossary definitions change independent of the Rules of Procedure definitions, there should be some statement about which governs or about the process that will take place when the Standards Glossary definitions are changed.

Finally, LG&E and KU Energy continue to be concerned that the terms “Bulk Electric System” and “Bulk Power System” are used interchangeably. While Bulk Electric System is objectively defined, Bulk Power System remains subjective and without practical limitations.

If there are any questions please contact:

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