

NextEra Energy, Inc. views transferring definitions into the Rules of Procedure(ROP) as problematic. It would make more sense to reference the Glossary. Otherwise, any time there is a change in a definition, the ROP would have to be revised to avoid inconsistency.

NextEra Energy, Inc. also has concerns with the philosophical difference between the FERC and NERC definitions of reliability. The FERC definition of "Reliable Operation" is absolute due to the statement that events will not occur. This implies that if instability, uncontrolled separation or cascading failures do occur, "Reliable Operation" was lacking.

Please see references below:

FERC

"Reliable Operation" means operating the Elements of the Bulk Power System within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a Cyber Security Incident, or unanticipated failure of system Elements. ++

NERC

"Adequate Level of Reliability" means a condition of the Bulk Power System defined by the following Bulk Power System characteristics: the Bulk Power System is controlled to stay within acceptable limits during normal conditions; the Bulk Power System performs acceptably after credible contingencies; the Bulk Power System limits the impact and scope of instability and cascading outages when they occur; the Bulk Power System's Facilities are protected from unacceptable damage by operating them within Facility ratings; the Bulk Power System's integrity can be restored promptly if it is lost; the Bulk Power System has the ability to supply the aggregate electric power and energy requirements of the electricity consumers at all times, taking into account scheduled and reasonably expected unscheduled outages of Bulk Power System components. [Note: New definition]