

Bonneville Power Administration (BPA) Comments on Proposed Amendments to NERC ROP Section 300

BPA generally supports the proposed approach of the response to the FERC directive. BPA offers the following comments on the proposed changes and additions.

Section 309

No comments

Section 321

- Drafting teams need to have specific guidance to indicate their drafts must address specific directive(s).
 - Current projects may need to be amended and/or new projects may need to be created to allow drafting teams to address specific FERC directive(s).
- Section 321.1 – The second paragraph states that a memorandum describing the issues surrounding the regulatory directive shall be prepared if the BOT finds that a ballot pool has failed to approve a proposed standard that addresses a specific matter. BPA suggests that the information describing the issues surrounding the regulatory directive that would be included in the memo and distributed during the re-ballot should be made available during the initial ballot.
- Sec. 321 2 calls for a Standards Committee memorandum and a re-vote if the Board remands a proposal based on a failure to address a specific matter as directed by an ERO governmental authority. It is not clear, however, whether the Standards Committee memorandum must include proposed language that addresses the ERO governmental authority’s directive. To re-vote, it would seem that the memorandum must include proposed standards language.
- Section 321.2.2 – BPA would like a definition and description of “substantive”.
- Section 321.4– BPA generally agrees with the new section. Section 321.4.3.2 is a bit confusing. BPA recommends rewording this section to emphasize that NERC will file it’s recommendation that the standard not be made effective, an explanation of the basis for it’s conclusion and the draft reliability standard.
- Section 321.5 BPA would like to recommend NERC make the suggested report be made accessible and transparent to the industry.