

# Consideration of Comments

## Term 4: Blackstart Resource

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 4: Blackstart Resource

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

#### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

#### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 4: Blackstart Resource (redline)**

Blackstart Resource: A generating unit(s) and its associated set of equipment which has the ability to be started without support from the System or is designed to remain energized without connection to the remainder of the System, with the ability to energize a bus, meeting the Transmission Operator’s restoration plan needs for ~~real~~Real and ~~reactive~~Reactive power~~Power~~ capability, frequency and voltage control, and that has been included in the Transmission Operator’s restoration plan.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the terms “Real Power” and “Reactive Power” because these terms are defined in the Glossary, and their usage in this definition narrative is intended to have the meaning of the defined terms.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Kathy Caignon – City of Vineland	3		Yes	
<b>SDT response:</b>					
3	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
4	Leonard Kula – Independent Electricity System Operator	2		No	We do not agree with the proposed revisions as it fall short of including the Reliability Coordinator. We suggest to add “and Reliability Coordinator’s” after each of the

#	Commenter Organization	Segment	Group name	Y/N	Comment
					"Transmission Operator's" since in EOP-006-2, the RC's restoration plan also requires the utilization of Blackstart Resources.
<p><b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Blackstart Resource, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. To the extent you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.</p>					
5	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
<p><b>SDT response:</b></p>					
6	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<p><b>SDT response:</b></p>					
7	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<p><b>SDT response:</b></p>					
8	Thomas Foltz – AEP	5		Yes	
<p><b>SDT response:</b></p>					
9	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<p><b>SDT response:</b></p>					
10	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b>					
11	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b>SDT response:</b>					
12	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC-- Project 2015-04	No	<p>We agree with the consistency revisions proposed, but the need to capture the restoration needs and obligations of Reliability Coordinators under EOP-006-2 must be addressed. Suggest that the SDT add “and Reliability Coordinator’s” after each of the “Transmission Operator’s” to reflect that, in EOP-006-2, the RC’s restoration plan also requires the utilization of Blackstart Resources.</p> <p>Also, the second part of the definition pertains to a generating unit that “is designed to remain energized without connection to the remainder of the System.” We suggest that the SDT consider deleting this aspect of the definition due to the fact that although such a generating unit could be utilized for system restoration, it would not (indeed, could not) be classified in advance as a Blackstart Resource within the restoration plan (i.e., there is no guarantee that the unit would be operating at the time of the disturbance).</p>
<p><b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Blackstart Resource, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. To the extent you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.</p>					
13	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<b>SDT response:</b>					
14	Andrew Pusztai – American Transmission Company, LLC	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b>					
15	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
16	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	
<b>SDT response:</b>					
17	Robert Coughlin – On Behalf of: Michael Pucas, ISO New England, Inc.	2		No	<p>ISO-NE agrees with the consistency revisions proposed, but respectfully suggests that the SDT overlooked the need to capture the restoration needs and obligations of Reliability Coordinators under EOP-006-2. Thus, ISO-NE suggests that the SDT add “and Reliability Coordinator’s” after each of the “Transmission Operator’s” to reflect that, in EOP-006-2, the RC’s restoration plan also requires the utilization of Blackstart Resources.</p> <p>Also, the second part of the definition pertains to a generating unit that “is designed to remain energized without connection to the remainder of the System.” ISO-NE suggests that the SDT consider deleting this aspect of the definition due to the fact that although such a generating unit could be utilized for system restoration, it would not (indeed, could not) be classified in advance as a Blackstart Resource within the restoration plan (i.e., there is no guarantee that the unit would be operating at the time of the disturbance).</p>
<p><b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Blackstart Resource, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. To the extent you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.</p>					
18	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
19	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.					
20	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>[1] Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>[2] From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>[3] A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term. While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<b>SDT response:</b>					
<p>[1] Thank you for sharing your perspective on the efforts undertaken by this drafting team. We believe the project to be worthwhile and a beneficial use of time and resources.</p> <p>[2] During Phase 1 of this project, the drafting team identified all existing defined terms that are contained in both the Glossary and the ROP ("cross-over terms"), and to the extent there were definitional differences, proposed alignment revisions where appropriate. For each of the cross-over terms under consideration, the drafting team undertook substantial background research before determining whether alignment revisions were appropriate, including an examination of the</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>history of the term’s definition, previous drafting teams’ intent, relevant NERC filings to FERC, and any FERC orders approving the term’s definition. Additionally, the SDT examined how the term is used in the Glossary, Reliability Standards, and ROP provisions, and how any proposed revisions will affect the application of the standards or rules. As the drafting team completed the task of aligning the cross-over terms, it identified how the definitional differences between the two terms came to exist. The team uncovered a number of reasons as to why definitions found in the Glossary and the ROP were not always aligned. In some instances, the differences were intentional and appropriate; however, in a large majority of instances, the differences were not appropriate or intentional, and in need of revision. Based on this thorough examination, the SDT determined on a case-by-case basis whether alignment revisions were appropriate. The drafting team did not propose alignment revisions to the existing definitions if the alignment resulted in an improper or incorrect change to the meaning of a definition.</p> <p>Furthermore, the drafting team notes that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations.</p> <p>[3] The drafting team agrees that in some respects it would be easier to have one document containing all of the NERC defined terms. However, due to the differences in how the two sources are revised and the differences in how the terms are used, the team is not recommending that the two sources are combined. The drafting team notes that the defined terms included in the Glossary and ROP are applicable only with regard to the source in which they are defined (Glossary terms only apply to Reliability Standards, whereas ROP terms only apply to provisions of the ROP). Given that the Reliability Standards and the ROP address very different subject matters and serve different purposes, the definitions are developed and maintained separately. Additionally, the process for revising Glossary terms is substantially different than for revising ROP terms. Glossary terms must be developed (and revised) in the same manner as Reliability Standards - by a drafting team and subject to industry ballot and approval (See Section 5 of the Standards Process Manual). On the other hand, revisions to the Rules of Procedure (including the defined terms found in Appendix 2) are undertaken through Section 1400 of the Rules of Procedure. As indicated above, during Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The team will consider the issues raised in your comments during the Phase 2 development stage.</p>					
21	John Allen – City Utilities of Springfield, Missouri	4		Yes	
<b>SDT response:</b>					
22	Jeremy Voll –	3		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Basin Electric Power Cooperative				
<b>SDT response:</b>					
23	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
24	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
25	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	No	<p>The SRC agrees with the consistency revisions proposed, but respectfully suggests that the SDT overlooked the need to capture the restoration needs and obligations of Reliability Coordinators under EOP-006-2. Thus, the SRC suggests that the SDT add “and Reliability Coordinator’s” after each of the “Transmission Operator’s” to reflect that, in EOP-006-2, the RC’s restoration plan also requires the utilization of Blackstart Resources.</p> <p>Also, the second part of the definition pertains to a generating unit that “is designed to remain energized without connection to the remainder of the System.” The SRC suggests that the SDT consider deleting this aspect of the definition due to the fact that, although such a generating unit could be utilized for system restoration, it would not (indeed, could not) be classified in advance as a Blackstart Resource within the restoration plan (i.e., there is no guarantee that the unit would be operating at the time of the disturbance).</p>
<p><b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Blackstart Resource, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. To the extent you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.</p>					
26	Heather Morgan –	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	EDP Renewables North America LLC				
<b>SDT response:</b>					
27	Shawna Speer – Colorado Springs Utilities	1		Yes	
<b>SDT response:</b>					
28	Linda Jacobson-Quinn – City of Farmington	3		Yes	
<b>SDT response:</b>					
29	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
30	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
31	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
32	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
33	Mike Smith – Manitoba Hydro	1		No	On its own, Real is not a defined term. "... Real and Reactive Power" should be changed to "Real Power and Reactive Power" for referencing the defined term Real Power.
<p><b>SDT response:</b> Thank you for your comments; however, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Blackstart Resource, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. Adding the word "Power" to modify "Real" would require a change to both the Glossary and ROP definitions. However, the drafting team appreciates your comment and agrees that, when possible, there should be consistency in sentence structure throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.</p>					
34	Andrew Gallo – Austin Energy	6		Yes	
<p><b>SDT response:</b></p>					
35	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<p><b>SDT response:</b></p>					
36	Yuguang Xiao – Manitoba Hydro	5		No	
<p><b>SDT response:</b></p>					
37	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<p><b>SDT response:</b></p>					
38	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<p><b>SDT response:</b></p>					

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39	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
40	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	
<b>SDT response:</b>					
41	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<b>SDT response:</b>					
42	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<b>SDT response:</b>					
43	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborator s - Terms Project	Yes	
<b>SDT response:</b>					
44	Michelle D'Antuono – Oxy - Ingleside Cogeneration LP	5		Yes	We agree with comments submitted by Occidental Chemical Corporation.
<b>SDT response:</b>					

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45	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
46	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
47	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
48	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
49	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
50	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
51	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term “Transmission” throughout the definition, as it is currently a defined term.
<b>SDT response:</b> Thank you for your comments. The drafting team notes that the “transmission” is not used as a stand-alone term in this definition. However, the team agrees that, in general, there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of					

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<p>capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
52	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<p><b><u>SDT response:</u></b></p>					

**End of Report**

# Consideration of Comments

## Term 6: Bulk Power System

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 6: Bulk Power System

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

## Question 2

### Term 6: Bulk-Power System (redline)

#### Bulk- Power System:

(A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and

(B) electric energy from generation facilities needed to maintain transmission system reliability.

The term does not include facilities used in the local distribution of electric energy. (In order to remain consistent with the Federal Power Act [16 U.S.C. 824(o) and 18 C.F.R. 39.1], defined terms contained in this narrative are not capitalized.) Note that the terms “Bulk-Power System” or “Bulk Power System” shall have the same meaning.

The SDT is proposing revisions to both the Glossary and ROP definition in order to align the two terms and maintain consistency with the Federal Power Act. Both the ROP and Glossary definitions have been approved by FERC (See, Glossary: [FERC Order](#); and ROP: [FERC Order on Compliance Filing, FERC Order Approving Amendments to the ROP](#)). However, there are a number of differences, mostly minor, in the two definitions. The different language may be perceived to mean that the terms are intended to have different meanings, when this is not the case. There is no reason for the terms to have differing definitions, as both terms are intended to have the meaning of the definition in Section 215 of the Federal Power Act. The SDT revisions align the terms by eliminating the unnecessary differences.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

Based on the industry comments received, the drafting team has made the following errata changes (below is the balloted definition with a redline of the errata changes):

#### Bulk Power System:

(A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and

(B) electric energy from generation facilities needed to maintain transmission system reliability.

The term does not include facilities used in the local distribution of electric energy. ~~(In order to remain consistent with the Federal Power Act [16 U.S.C. 824(o) and 18 C.F.R. 39.1], defined terms contained in this narrative are not capitalized.)~~ (Note that the terms “Bulk-Power System” or “Bulk Power System” shall have the same meaning.)

#### Explanation of errata changes:

The drafting team originally included a parenthetical to clarify that any NERC defined terms contained in the definition of “Bulk Power System” were consistent with the Federal Power Act. However, a number of commenters believe that the parenthetical creates confusion and unnecessary complication. The drafting team therefore removed the parenthetical

sentence. Removal of the parenthetical did not alter the meaning or application of the definition, and is not a substantive change.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Kathy Caignon – City of Vineland	3		Yes	
<b>SDT response:</b>					
3	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
4	Leonard Kula – Independent Electricity System Operator	2		No	<p>While we generally support the proposed revisions, we are unable to support the inclusion of the phrase “In order to remain consistent with the Federal Power Act [16 U.S.C. 824(o) and 18 C.F.R. 39.1],” since there are entities such as the IESO that are not under FERC’s jurisdiction. We believe this note needs to be reworded as follows:</p> <p>The term does not include facilities used in the local distribution of electric energy. (In order to remain consistent with published regulatory documents, defined terms contained in this narrative are not capitalized.) Note that the terms “Bulk-Power System” or “Bulk Power System” shall have the same meaning.</p>
<p><b>SDT response:</b> The drafting team included the parenthetical to clarify that any NERC defined terms contained in the definition of “Bulk Power System” were consistent with the Federal Power Act. However, a number of commenters believe that the parenthetical creates confusion and unnecessary complication. The drafting team therefore removed the parenthetical sentence.</p>					
5	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		No	NERC should delete all references to the Federal Power Act throughout these revisions and “re-capitalize” NERC defined terms within all of the definitions. Seminole’s reasoning for this is that each term should have one

#	Commenter Organization	Segment	Group name	Y/N	Comment
					reference only. For example, if NERC feels that the defined term “Facilities” does not encapsulate the meaning put forth by Congress of “facilities” in the Federal Power Act, then the drafting team should revise the definition for Facilities. Referencing both the Federal Power Act and the NERC Glossary can cause confusion where legislative background can be interpreted differently than NERC definition drafting team responses and notes.
<p><b>SDT response:</b> The drafting team included the parenthetical to clarify that any NERC defined terms contained in the definition of “Bulk Power System” were consistent with the Federal Power Act. However, a number of commenters believe that the parenthetical creates confusion and unnecessary complication. The drafting team therefore removed the parenthetical sentence.</p> <p>Additionally, the drafting team agrees that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
6	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<p><b>SDT response:</b></p>					
7	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<p><b>SDT response:</b></p>					
8	Thomas Foltz – AEP	5		Yes	
<p><b>SDT response:</b></p>					
9	Dennis Minton –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Florida Keys Electric Cooperative Assoc.				
<b>SDT response:</b>					
10	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
11	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	No	Dominion believes that all terms which are defined in the NERC Glossary should be capitalized for consistency. We do not agree that an exception, solely to insure that consistency with the Federal Power Act is maintained, should be made. If this exception is accepted, what justification would be used for not being consistent with other regulatory statutes?
<b>SDT response:</b> The drafting team agrees that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					
12	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	No	For consistency with federal documents, Bulk-Power System (with the hyphen) should be used in all documents where appropriate. For NERC documents, capitalization should be consistent. If, for example, Facilities is capitalized in the Glossary, then Facilities should be capitalized in the RoP regardless of how they are shown in federal documents.
<b>SDT response:</b> The drafting team removed the hyphen from the term “Bulk-Power System” in the Glossary to align with the ROP definition. The hyphen was removed because it is not being used as a compound modifier (two words coupled together to make an adjective). Given that “bulk” is being used to describe the “power grid,” no hyphen is needed. If instead, “bulk power” was being used to describe “grid,” then a hyphen (compound modifier) would be appropriate to connect bulk-power. With regard to your comments on consistency, the drafting team agrees that there should consistency in the use of capitalization throughout					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
13	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<b>SDT response:</b>					
14	Andrew Puztai – American Transmission Company, LLC	1		Yes	
<b>SDT response:</b>					
15	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
16	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>We also recommend the last sentence (note) be moved inside the parenthesis so it is not confused with being part of the definition.</p>
<p><b>SDT response:</b> The drafting team included the parenthetical to clarify that any NERC defined terms contained in the definition of “Bulk Power System” were consistent with the Federal Power Act. However, a number of commenters believe that the parenthetical creates confusion and unnecessary complication. The drafting team therefore removed the parenthetical sentence.</p>					
17	John Pearson –	2		No	ISO New England generally supports the proposed revisions, but is unable to support the inclusion of the phrase “In order to remain consistent with the

#	Commenter Organization	Segment	Group name	Y/N	Comment
	On Behalf of: Michael Pucas, ISO New England, Inc.				<p>Federal Power Act [16 U.S.C. 824(o) and 18 C.F.R. 39.1].” ISO New England notes that, since there are entities such as the IESO that are not under FERC’s jurisdiction any revisions to the definition should respect the differing regulatory regimes in effect. ISO New England suggests that this note be reworded as follows:</p> <p>The term does not include facilities used in the local distribution of electric energy. (In order to remain consistent with applicable regulatory authorities, defined terms contained in this narrative are not capitalized.) Note that the terms “Bulk-Power System” or “Bulk Power System” shall have the same meaning.</p>
<p><b>SDT response:</b> The drafting team included the parenthetical to clarify that any NERC defined terms contained in the definition of “Bulk Power System” were consistent with the Federal Power Act. However, a number of commenters believe that the parenthetical creates confusion and unnecessary complication. The drafting team therefore removed the parenthetical sentence.</p>					
18	Jared Shakespeare – Peak Reliability	1		Yes	
<p><b>SDT response:</b></p>					
19	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<p><b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.</p>					
20	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don’t have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The “Detailed Description” section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a>					
21	John Allen – City Utilities of Springfield, Missouri	4		Yes	
<b>SDT response:</b>					
22	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
23	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
24	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
25	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	No	<p>The SRC generally supports the proposed revisions, but is unable to support the inclusion of the phrase “In order to remain consistent with the Federal Power Act [16 U.S.C. 824(o) and 18 C.F.R. 39.1].” The SRC notes that, since there are entities such as the IESO that are not under FERC’s jurisdiction, any revisions to the definition should respect the differing regulatory regimes in effect. The SRC suggests that this note be reworded as follows:</p> <p>The term does not include facilities used in the local distribution of electric energy. (In order to remain consistent with applicable regulatory authorities, defined terms contained in this narrative are not capitalized.) Note that the terms “Bulk-Power System” or “Bulk Power System” shall have the same meaning.</p>
<p><b>SDT response:</b> The drafting team included the parenthetical to clarify that any NERC defined terms contained in the definition of “Bulk Power System” were consistent with the Federal Power Act. However, a number of commenters believe that the parenthetical creates confusion and unnecessary complication. The drafting team therefore removed the parenthetical sentence.</p>					
26	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<p><b>SDT response:</b></p>					
27	Shawna Speer – Colorado Springs Utilities	1		Yes	
<p><b>SDT response:</b></p>					
28	Linda Jacobson-Quinn – City of Farmington	3		No	The terms still don’t align – the ROP changes remains ambiguous in that it depends on the context and specifically references Appendix 4E.
<p><b>SDT response:</b> The drafting team aligned the existing language to the greatest degree possible. However, the team agrees that the ROP definition language that references Appendix 4E should be removed so that the definitions are perfectly aligned. As part of Phase 2 of this project, the team will consider a recommendation to revise Appendix 4E to reference the Bulk Electric System (when appropriate) instead of the Bulk Power System. Once the appropriate changes are made, the reference to Appendix 4E can be removed from the ROP definition.</p>					
29	Dan Wilson –	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	PPL Electric Utilities Corporation				
<b>SDT response:</b>					
30	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
31	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
32	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
33	Mike Smith – Manitoba Hydro	1		No	Proposed changes to 6 (Bulk-Power System), 40 (Reliability Standard) and 41 (Reliable Operation) relating to the Federal Power Act are not made consistently.  Redlined added text referencing the Federal Power Act should be consistently written for #6, #40, #41. Bulk-Power System should appear consistently in the definitions of #6, #40, #41. Defined terms should be written consistently. If using "reliable operation [Reliable Operation]", should also use same approach "facilities [Facility(ies)]" for all other defined terms.
<b>SDT response:</b> The drafting team included the parenthetical to clarify that any NERC defined terms contained in the definition of “Bulk Power System” were consistent with the Federal Power Act. However, a number of commenters believe that the parenthetical creates confusion and unnecessary complication. The drafting team therefore removed the parenthetical sentence.					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>Additionally, the drafting team agrees that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
34	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
35	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	<p>Texas RE noticed in this definition, and several others, terms like “facilities” are not capitalized even though “Facility” is a defined term in the Glossary. This thought is not consistently applied throughout the terms (e.g. :”Reliability Standards Development Plan” includes the capitalized term “Reliability Standard”).</p> <p>In general, Texas RE recommends consistency with capitalization. Capitalization infers a term is defined in the Glossary and/or ROP.</p>
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.</p>					
36	Yuguang Xiao – Manitoba Hydro	5		No	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
37	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					
38	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
39	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
40	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	
<b>SDT response:</b>					
41	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<b>SDT response:</b>					
42	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<b>SDT response:</b>					
43	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	There needs to be consistency with the use of brackets to signify Glossary/ROP term that are intended to have the meaning of the definition in Section 215 of the Federal Power Act. “Bulk-Power System” did not use brackets for the terms

#	Commenter Organization	Segment	Group name	Y/N	Comment
					[Facilities], [Transmission], and [System]. However, the drafting team chose to add brackets to signify Glossary/ROP terms in the “Reliability Standard” and “Reliable Operation” definitions.
<b>SDT response:</b> The drafting team believes this comment pertains to Term 41: Reliability Standard, not Term 6: Bulk Power System. The team directs you to the responses to Term 6.					
44	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
45	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
46	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
47	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
48	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
49	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
50	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term “Transmission” throughout the definition, as it is currently a defined term.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.</p>					
51	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<p><b>SDT response:</b></p>					
52	Patrick Brown - Canadian Electricity Association			No	<p>The Canadian Electricity Association (CEA) requests that a qualifier be inserted to clarify that the Federal Power Act is a U.S. statute. Wording as follows seems appropriate: "In order to remain consistent with the U.S. Federal Power Act..."</p> <p>CEA believes that every defined term in the NERC Glossary and ROP should be respectful of Canadian entities - including those applicable governmental authorities in Canada with responsibility for reliability oversight - as well as the North American nature of the grid and NERC's mission as an international reliability organization. If any statute is referenced in the Glossary or ROP, the jurisdiction in which that statute is in effect should be clarified, rather than there being an implicit assumption of U.S. jurisdiction. The citations to the U.S. Code and Code of Federal Regulations which follow are not suitable to serve as such references, as they are not necessarily abbreviations which will be familiar to all non-legal, third-party audiences in North America.</p> <p>In general, CEA believes that the NERC Glossary should not have to refer to</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					specific pieces of governing legislation. However, if the SDT chooses to proceed, CEA requests that it include the U.S. qualifier for the FPA suggested above.
<p><b>SDT response:</b> Thank you for your comment. In response to your concerns and a number of other industry comments, the drafting team removed the parenthetical containing the reference to the Federal Power Act.</p>					

**End of Report**

# Consideration of Comments

## Term 7: Cascading

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 7: Cascading

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 7: Cascading (redline)**

Cascading:

The uncontrolled successive loss of ~~system-System elements-Elements~~ triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.

**The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the terms “System” and “Elements” because these terms are defined in the Glossary, and their usage in this definition narrative is intended to have the meaning of the defined terms.**

**Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.**

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	No	Recommend that this term be moved to Phase 2, whereby it can be redefined in light of FERC’s letter approving CIP-014-2. FERC explains that they are removing the word widespread since it is unclear on how it will be enforced.
<b>SDT response:</b> Thank you for your comment. The drafting team is not addressing this issue as part of its project because the use of the undefined term “widespread” has presented no conflict with aligning the definition of the term “Cascading” across the ROP and the Glossary. The drafting team suggests that you submit a SAR if you believe a development project should address whether FERC’s CIP-014-2 letter order warrants reconsideration of the undefined term “widespread” in the definition of “Cascading.”					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
<b>SDT response:</b>					
4	Mary Claire Yatsko –	1,3,4,5,6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Seminole Electric Cooperative, Inc.				
<b>SDT response:</b>					
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b>SDT response:</b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b>SDT response:</b>					
11	Lee Pedowicz –	10	NPCC--Project 2015-04	No	[1] Introducing the defined terms for System and Elements makes the definition for Cascading incoherent. The Glossary defines System as a "A combination of

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Northeast Power Coordinating Council				<p>generation, transmission, and distribution components." and Element as "Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An Element may be comprised of one or more components." Both System and Element are composed of components. The System components are Elements, and components of Elements are make up the Element. The definition proposed for Cascading starts with "The uncontrolled successive loss of System Elements triggered by an incident at any location." The use of System Elements is redundant. System should be replaced with Bulk Electric System, or otherwise should not be capitalized.</p> <p>[2] Suggest adding the word "local" before the word "area." Also, the definition should recognize that, under TPL-001-4, the Transmission Planner defines and documents, within its Planning Assessment, the criteria or methodology used in the analysis to identify System instability for conditions such as Cascading.</p>

**SDT response:**

[1] The proposed alignment revisions incorporate usage of the defined terms "System" and "Element." These revisions do not change the meaning of the definition of Cascading.

[2] Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. For the term Cascading, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.

12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
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**SDT response:**

13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
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**SDT response:**

#	Commenter Organization	Segment	Group name	Y/N	Comment
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	While “System” and “Element” are defined terms in the Glossary, “System Elements” is not a defined term. A possible rephrasing that would retain the same meaning but avoid the use of conjoined terms would be “The uncontrolled successive loss of Elements within a System, triggered by an incident at any location.”
<b>SDT response:</b> The drafting team agrees that the consecutive use of two (or more) defined terms may create confusion. During Phase 2 of this project, the drafting team will consider recommendations related to sentence structure. The team will consider the issue raised in your comments in developing the Phase 2 recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					
16	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don’t have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The “Detailed Description” section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<b>SDT response:</b> Please see the drafting team response to your comment for Term 4: Blackstart Resource.					
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	See comments from SPP Standards Review Group.
<b>SDT response:</b>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		No	Recommend that this term be moved to Phase 2, whereby in can me redefined in light of FERC's letter approving CIP-014-2. FERC explains that they are removing the word widespread since it is unclear on how it will be enforced.
<b>SDT response:</b> Thank you for your comment. The drafting team is not addressing this issue as part of its project because the use of the undefined term "widespread" has presented no conflict with aligning the definition of the term "Cascading" across the ROP and the Glossary. The drafting team suggests that you submit a SAR if you believe a development project should address whether FERC's CIP-014-2 letter order warrants reconsideration of the undefined term "widespread" in the definition of "Cascading."					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Hydro-Quebec TransEnergie				
<b>SDT response:</b>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	No	The SRC recommends that the word “local” be inserted before the word “area.” Also, the definition should recognize that, under TPL-001-4, the Transmission Planner defines and documents within its Planning Assessment, the criteria or methodology used in the analysis to identify System instability for conditions such as Cascading.
<b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Cascading, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.					
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<b>SDT response:</b>					
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
<b>SDT response:</b>					
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	
<b>SDT response:</b>					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
28	Yvonne McMackin –	4		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Public Utility District No. 2 of Grant County, Washington				
<b>SDT response:</b>					
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		Yes	
<b>SDT response:</b>					
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	Texas RE agrees with the decision to capitalize the words “System” and “Elements”. Texas RE inquires as to whether this could lead to confusion as there is no defined term “System Elements”, but rather the term “System” is defined and the term “Elements” is defined.
<b>SDT response:</b> The drafting team agrees that the consecutive use of two (or more) defined terms may create confusion. During Phase 2 of this project, the drafting team will consider recommendations related to sentence structure. The team will consider the issue raised in your comments in developing the Phase 2 recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					

#	Commenter Organization	Segment	Group name	Y/N	Comment
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
<b>SDT response:</b>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	We recommend that use of the term “widespread” in this definition be reviewed in the later phases of this project.
<b>SDT response:</b> Thank you for your comment. The drafting team is not addressing this issue as part of its project because the use of the undefined term “widespread” has presented no conflict with aligning the definition of the term “Cascading” across the ROP and the Glossary. The drafting team suggests that you submit a SAR if you believe a development project should address whether FERC’s CIP-014-2 letter order warrants reconsideration of the undefined term “widespread” in the definition of “Cascading.”					
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<b>SDT response:</b>					
40	Robert A. Schaffeld –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Southern Company - Southern Company Services, Inc.				
<b>SDT response:</b>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	Capitalizing "System" fundamentally alters the meaning of the definition because the NERC Glossary Term "System" includes distribution components. Thus, by including distribution components, a hurricane causing “widespread electric service interruption” on distribution levels could be defined as Cascading. Clearly this is not Cascading.
<b>SDT response:</b> The proposed alignment revisions incorporate usage of the defined terms “System” and “Element.” These revisions do not change the meaning of the definition of Cascading. Furthermore, inclusion of the word “distribution” does not change the meaning of the definition. When evaluating Cascading one must analyze the "System," which may include the impacts of a distribution outage as it impacts the transmission and generation.					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
45	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
46	Tony Eddleman –	3		No	I support MRO NSRF comments.

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Nebraska Public Power District				
<b>SDT response:</b> Please see SDT response to MRO NSRF comments.					
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	
<b>SDT response:</b>					
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<b>SDT response:</b>					
50	Jonathan Appelbaum - United Illuminating Co.	1		No	Introducing the defined terms for System and Elements makes the definition for Cascading incoherent. The Glossary defines a System as a "A combination of generation, transmission, and distribution components." and Elements as "Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An Element may be comprised of one or more components." So both System and Elements are composed of components. The System components are Elements, and the Elements components are the mechanical things that make the device work. The definition proposed for Cascading starts with "The uncontrolled successive loss of System Elements triggered by an incident at any location." I think System should not be capitalized or system should be Bulk Electric System Elements since BES is defined differently than System.
<b>SDT response:</b> The proposed alignment revisions incorporate usage of the defined terms "System" and "Element." These revisions do not change the meaning of the definition of Cascading.					
51	John Pearson On Behalf of: Michael Puscas, ISO New England, Inc.	2		No	The word "local" should be inserted before the word "area." Also, the definition should recognize that, under TPL-001-4, the Transmission Planner defines and documents, within its Planning Assessment, the criteria or methodology used in the analysis to identify System instability for conditions such as Cascading.

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p><b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Cascading, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.</p>					

**End of Report**

# Consideration of Comments

## Term 13: Distribution Provider

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 13: Distribution Provider

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 13: Distribution Provider (redline)**

Distribution Provider:

Provides and operates the “wires” between the transmission system and the end-use customer. For those end-use customers who are served at transmission voltages, the Transmission Owner also serves as the Distribution Provider. Thus, the Distribution Provider is not defined by a specific voltage, but rather as performing the ~~Distribution~~ distribution function at any voltage.

**The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to remove the capitalization from the term “Distribution” because it is not a defined term in Glossary (or the ROP).**

**Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.**

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b><u>SDT response:</u></b>					
2	Kathy Caignon – City of Vineland	3		Yes	
<b><u>SDT response:</u></b>					
3	Emily Rousseau – MRO	1,2,3,4, 5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b><u>SDT response:</u></b>					
4	Leonard Kula – Independent Electricity System Operator	2		Yes	While we do not disagree with the proposed changes, the definition is quite different from that presented in the Functional Model. Suggest to adopt the FM definition, or to revise the definition in the FM to achieve total consistency.
<b><u>SDT response:</u></b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
5	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5, 6		Yes	
<b>SDT response:</b>					
6	John Seelke – PSEG	1,2,5,6 -	PSEG	Yes	
<b>SDT response:</b>					
7	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
8	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
9	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
10	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
11	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	No	Dominion suggested replacing the term “wires” with “electrical elements” since ‘wires” could be construed to exclude transformers, breakers, switches, reclosers, fuses, etc.
<p><b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Distribution Provider, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.</p>					
12	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	Yes	
<p><b>SDT response:</b></p>					
13	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<p><b>SDT response:</b></p>					
14	Andrew Puztai – American Transmission Company, LLC	1		Yes	
<p><b>SDT response:</b></p>					
15	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<p><b>SDT response:</b></p>					
16	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>[1] For form consistency with other registered entity type definitions contained in the Glossary, we recommend starting the definition with “The entity that provides...”.</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>[2] We also recommend capitalization of the word “Transmission” within the DP definition (two locations) because this term is defined in the Glossary and we believe its usage in the DP definition narrative is intended to have the meaning of the defined term.</p> <p>[3] “System” is also a defined term in the Glossary, but its use in the DP definition narrative does not appear to have the same meaning as the defined term, since the defined term is inclusive of “distribution components”.</p>
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in form, sentence structure and capitalization throughout the NERC defined terms. For example, during the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will develop recommendations related to the issues identified in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.</p>					
17	Jared Shakespeare – Peak Reliability	1		No	<p>[1] We recommend removing the quotes around “wires” as it seems odd to have quotes in a definition.</p> <p>[2] Also, Is the DP definition still needed if the risk-based registration project did away with it?</p>
<p><b>SDT response:</b></p> <p>[1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of “quotes” throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.</p> <p>[2] The Risk-Based Registration initiative revised the peak load threshold for Distribution Providers. However, no revisions were made to the ROP, Appendix 2 definition of the term. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP. Currently, the two definitions are aligned. The drafting team notes that during Phase 1 of this project, a number of commenters raised concerns regarding possible revisions</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters.</p>					
18	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<p><b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.</p>					
19	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<p><b>SDT response:</b> Please see the drafting team response to your comment for Term 4: Blackstart Resource.</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
20	John Allen – City Utilities of Springfield, Missouri	4		Yes	
<b>SDT response:</b>					
21	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
22	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
23	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
24	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model.
<b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					
25	Heather Morgan –	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	EDP Renewables North America LLC				
<b>SDT response:</b>					
26	Shawna Speer – Colorado Springs Utilities	1		Yes	
<b>SDT response:</b>					
27	Linda Jacobson-Quinn – City of Farmington	3		No	The NERC Functional Model also includes a definition for Distribution Provider. This term The functional entity that provides facilities that interconnect an End-use Customer load and the electric system for the transfer of electrical energy to the End-use Customer. The NERC Functional Model should also align with the NERC RoP and Glossary of Terms.
<b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					
28	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
29	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
30	Michiko Sell –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Public Utility District No. 2 of Grant County, Washington				
<b>SDT response:</b>					
31	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
32	Mike Smith – Manitoba Hydro	1		Yes	
<b>SDT response:</b>					
33	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
34	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b>SDT response:</b>					
35	Yuguang Xiao – Manitoba Hydro	5		Yes	
<b>SDT response:</b>					
36	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					
37	Martin Boisvert –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Hydro-Quebec TransEnergie				
<b>SDT response:</b>					
38	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
39	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	
<b>SDT response:</b>					
40	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<b>SDT response:</b>					
41	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<b>SDT response:</b>					
42	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	Yes	
<b>SDT response:</b>					
43	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b>					
44	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
45	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
46	Jared Shakespeare – Peak Reliability	1		Yes	<p>[1] We recommend removing the quotes around “wires” as it seems odd to have quotes in a definition.</p> <p>[2] Also, Is the DP definition still needed if the risk-based registration project did away with it?</p>
<b>SDT response:</b>					
<p>[1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of “quotes” throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.</p> <p>[2] The Risk-Based Registration initiative revised the peak load threshold for Distribution Providers. However, no revisions were made to the ROP, Appendix 2 definition of the term. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP. Currently, the two definitions are aligned. The drafting team notes that during Phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters.</p>					
47	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
48	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
49	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term “Transmission” throughout the definition, as it is currently a defined term.
<b>SDT response:</b> Phase 2 – same response as Comment [16] above					
50	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.					

**End of Report**

# Consideration of Comments

## Term 14: Element

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 14: Element

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

#### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

#### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

ohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 14: Element (redline)**

Element:

Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An ~~element~~ Element may be comprised of one or more components.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “Element” because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
<b>SDT response:</b>					
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b>SDT response:</b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	No	<p>Dominion does not believe it is necessary to use the capitalized version of a term in the definition of that term.</p> <p>For consistency with the first sentence of the definition, Dominion suggest the following: “Element: Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An element may be comprised of one or more components electrical devices. “</p>
<b>SDT response:</b> Thank you for your comment. The drafting team believes the proposed alignment revisions are appropriate.					

#	Commenter Organization	Segment	Group name	Y/N	Comment
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	Yes	
<b>SDT response:</b>					
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<b>SDT response:</b>					
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<b>SDT response:</b>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary definition.  We also recommend capitalization of “Transmission Line” within the Element definition because this term is defined in the Glossary and we believe its usage in the Element definition narrative is intended to have the meaning of the defined term.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.</p>					
16	Jared Shakespeare – Peak Reliability	1		Yes	
<p><b>SDT response:</b></p>					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<p><b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.</p>					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort,</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.
<b>SDT response:</b> Please see the drafting team response to your comment for Term 4: Blackstart Resource.					
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	
<b>SDT response:</b>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	
<b>SDT response:</b>					
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
<b>SDT response:</b>					
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	
<b>SDT response:</b>					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	The last sentence is exactly what Texas Re would like to see. The term is capitalized because it is defined and is intended to have the meaning of the defined term. Additionally, it would be helpful to list examples of components, such as wave traps, air switches, transformer tap changers, etc.
<b>SDT response:</b> <a href="#">Thank you for your comments.</a>					
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
<b>SDT response:</b>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<b>SDT response:</b>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<b>SDT response:</b>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	“Transmission Line” is a defined term and the drafting team should consider if it should be capitalized.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.</p>					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b><u>SDT response:</u></b>					
45	Jared Shakespeare – Peak Reliability	1		Yes	
<b><u>SDT response:</u></b>					
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b><u>SDT response:</u></b>					
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b><u>SDT response:</u></b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	
<b><u>SDT response:</u></b>					
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<b><u>SDT response:</u></b>					

**End of Report**

# Consideration of Comments

## Term 17: Generator Operator

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 17: Generator Operator

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 17: Generator Operator (redline)**

Generator Operator:

The entity that operates generating ~~Facility(ies) unit(s)~~ and performs the functions of supplying energy and Interconnected Operations Services.

The SDT is proposing to revise the Glossary definition to align with the ROP. This is because the term “unit” (used in the current Glossary definition) is not a NERC defined term, and thus introduces the possibility of inconsistent use or application of the definition. The ROP definition provides greater clarity because it uses the term “Facility(ies),” which is defined by NERC as, “a set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.).” (See also, [NERC Limited Answer to RBR Comments](#), pp. 6-7: “Finally, NERC’s proposed changes to the definitions of “Generator Owner” and “Generator Operator” which include replacing the undefined term “generating units” with the term “Facilities,” are appropriate. The term “Facilities” is defined in the NERC Glossary as a Bulk Electric System element, which ties in directly to the new BES definition. Use of the term “Facilities” has allowed NERC to eliminate the Part III threshold criteria and use the new Bulk Electric System core definition, inclusions and exclusions to identify Bulk Electric System generator assets.”)

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	We agree with the proposed changes, but suggest to also change the definition in the Functional Model to achieve total consistency.

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p><b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		No	The grammar of this definition does not appear to be correct. Seminole suggest “The entity that operates a generating Facility(ies) and performs the function of supplying energy and interconnected Operations Services.”
<p><b>SDT response:</b> Thank you for your comments; however, the proposed revisions fall outside the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.</p>					
5	John Seelke – PSEG	1,2,5,6 -	PSEG	No	<p>The comments below apply to both Term 17 (GOP) and Term 18 (GO)</p> <p>The SDT proposes to change “generating unit(s)” to “generating Facility(ies)” in the NERC Glossary definitions for Generator Owner (GO) and Generator Operator (GOP). The NERC Glossary term “Facility” means “a set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.).”</p> <p>While NERC has adopted new GO and GOP definitions for registration purposes, that action did not impact any GO or GOP registrations. However, extending those changes to the NERC Glossary will mean that the new definitions will apply to every existing and future Reliability Standards wherever “Generator Owner” and “Generator Operator” appears.</p> <p>As discussed below, the proposed definition changes may have unintended consequences for all GOs and GOPs. Therefore, PSEG is voting “Negative” until the SDT provides answers to the questions below.</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>1. For Inclusion I4 dispersed power producing resources (as defined in the Bulk Electric System definition), are busses and step-up transformers at points that aggregate less than 75 MVA of the output included in the “set of electrical equipment” needed to operate those resources? Please explain. If “yes,” may current or future Reliability Standards apply to such collector buses and step-up transformers if the NERC Glossary terms for GO and GOP are changed as proposed?</p> <p>2. Are “generator interconnection Facilities” included in the “set of electrical equipment” needed to operate all generating Facilities? Please explain.</p> <p>If “yes,” may current or future Reliability Standards apply to such generator interconnection Facilities if the NERC Glossary terms for GO and GOP are changed as proposed? Background for this question and one follow-up question on this topic are provided below:</p> <p><u>Background:</u> This term “generator interconnection facility” is defined Order No. 785 – see Paragraph 37. In Project 2010-07 (Generator Requirements at the Transmission Interface), that project’s team considered, but decided against, creating a definition for NERC Glossary term for “generator interconnection Facilities” – see Paragraph 36 – or redefining the meaning of “Generator Owner” and Generator Operator” to include generator interconnection Facilities as recommended by the prior Ad Hoc Group Report referenced in Paragraph 6 of Order No. 785.</p> <p><u>Follow-up question:</u> This Project 2015-04 team is encouraged to review Order No. 785 from this perspective of GOs and GOPs that may be currently also registered as TOs and TOPs because of their operation and ownership of generation interconnection Facilities. If the definitions of GO and GOP are amended as proposed, will such entities be subject to double jeopardy as a result of two registrations addressing the same facilities? See Paragraphs 41-53 and Paragraphs 54-57 in Order No. 785. This includes Cedar Creek and Harquahala. See Paragraphs 4-6 and Paragraph 54 in Order No. 785.</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					3. For all non-CIP NERC standards, will the proposed changes to the GO and GOP definitions expand the scope of “electrical equipment” needed to operate a BES generator to include non-electrical plant equipment and facilities such as boilers, turbines and the fuel/motive and cooling systems for them; all balance-of-plant and generator lubrication and cooling systems; plant building and site safety and security systems; plant emissions and discharge systems, monitoring and control systems other than a generator’s AVR, PSS, and governor.
<p><b>SDT response:</b> The alignment revisions replaced the undefined term (unit) with a defined term (Facility), which provides greater clarity in the context of the FERC-approved definition of BES and aligns with the definition of Generator Operator in Appendix 5B of the Rules of Procedure. Alignment of definitions in the ROP and Glossary supports the goal, outlined in Section 501 of the Rules of Procedure, for clear and consistent identification of those entities that are responsible for compliance with the approved Reliability Standards. The definition of GOP in the NERC Glossary only relates to <i>who</i> must comply with the requirements in the Reliability Standards. It does not relate to the facilities subject to those requirements. The drafting team determined that the proposed modification to the Glossary definition would not have an effect on who would be considered a GOP. That is, the same entities that would meet the current definition of GOP would also meet the revised definition.</p> <p>Additionally, the drafting team notes that as part of Phase 2, the team will submit a SAR recommending revisions to the definition of “Facility.” The drafting team highly encourages you to attend the next drafting team meeting, which will focus on development of the SAR and Phase 2 recommendations.</p>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins –	1, 6, 5, 3		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.				
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b>SDT response:</b>					
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	No	Considering the definition of Facility listed in the Glossary, a TOP operating a synchronous condenser or shunt compensator, which generates Mvars, could potentially qualify as operating a “generating Facility”. Would the TOP therefore be under an obligation to register as a GOP? Even though Footnote 3 on page 6 preceding mentions that “the clarity and content of the current definition could be improved”, and a SAR will be drafted, this should be taken care of now under this project.
<p><b>SDT response:</b> The alignment revisions replaced the undefined term (unit) with a defined term (Facility), which provides greater clarity in the context of the FERC-approved definition of BES and aligns with the definition of Generator Operator in Appendix 5B of the Rules of Procedure. Alignment of definitions in the ROP and Glossary supports the goal, outlined in Section 501 of the Rules of Procedure, for clear and consistent identification of those entities that are responsible for compliance with the approved Reliability Standards. The definition of GOP in the NERC Glossary only relates to <i>who</i> must comply with the requirements in the Reliability Standards. It does not relate to the facilities subject to those requirements. The drafting team determined that the proposed modification to the Glossary definition would not have an effect on who would be considered a GOP. That is, the same entities that would meet the current definition of GOP would also meet the revised definition.</p> <p>Additionally, the drafting team notes that as part of Phase 2, the team will submit a SAR recommending revisions to the definition of “Facility.” The drafting team highly encourages you to attend the next drafting team meeting, which will focus on development of the SAR and Phase 2 recommendations.</p>					
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<b>SDT response:</b>					
13	Andrew Pusztai –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	American Transmission Company, LLC				
<b>SDT response:</b>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition. We also think the addition of “electrical” prior to “energy” would add further clarity to the Generator Operator definition. If added, it should be capitalized as “Electrical Energy” since this term is also in the Glossary.</p> <p>In reviewing the Generator Operator definition, we observed that the definition of “Interconnected Operations Service” (IOS) in the Glossary is vague. The IOS definition (also being addressed by this project as Term 24) appears to have been taken from a NERC reference document that was developed in 2001 and filed with FERC under docket No. RM01-12, Electricity Market Design and Structure. To the extent that there are any IOS that are not performed by the Generator Operator in the market constructs of 2015, the definition may be overstating the functions supplied by the Generator Operator.</p>
<p><b>SDT response:</b> Thank you for your comments; however, the proposed revisions fall outside the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.</p>					
16	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<p><b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<p><b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a></p>					
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	See comments from SPP Standards Review Group.
<p><b>SDT response:</b></p>					
20	Jeremy Voll –	3		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Basin Electric Power Cooperative				
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		No	Considering the definition of Facility listed in the Glossary, a TOP operating a synchronous condenser or shunt compensator, which generates Mvars, could potentially qualify as operating a “generating Facility”. Would the TOP therefore be under an obligation to register as a GOP? Even though Footnote 3 on page 6 preceding mentions that “the clarity and content of the current definition could be improved”, and a SAR will be drafted, this should be taken care of now under this project.
<p><b>SDT response:</b> The alignment revisions replaced the undefined term (unit) with a defined term (Facility), which provides greater clarity in the context of the FERC-approved definition of BES and aligns with the definition of Generator Operator in Appendix 5B of the Rules of Procedure. Alignment of definitions in the ROP and Glossary supports the goal, outlined in Section 501 of the Rules of Procedure, for clear and consistent identification of those entities that are responsible for compliance with the approved Reliability Standards. The definition of GOP in the NERC Glossary only relates to <i>who</i> must comply with the requirements in the Reliability Standards. It does not relate to the facilities subject to those requirements. The drafting team determined that the proposed modification to the Glossary definition would not have an effect on who would be considered a GOP. That is, the same entities that would meet the current definition of GOP would also meet the revised definition.</p> <p>Additionally, the drafting team notes that as part of Phase 2, the team will submit a SAR recommending revisions to the definition of “Facility.” The drafting team highly encourages you to attend the next drafting team meeting, which will focus on development of the SAR and Phase 2 recommendations.</p>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model.
<p><b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
24	Heather Morgan – EDP Renewables North America LLC	5		No	Generator Operator: The entity that operates generating Facility(ies) and performs the functions of supplying energy and Interconnected Operations Services.
<b>SDT response:</b>					
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
<b>SDT response:</b>					
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	FEUS agrees with the term but recognizes it also used in the NERC Functional Model. The NERC Functional Model should be modified to align with the Glossary of Terms.
<p><b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		No	Inconsistent approach is used for referencing defined terms with different suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility(ies)".  Note that this inconsistency extends to multiple Glossary of Terms definitions that are not currently addressed in this project.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of suffixes throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.					
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
34	Yuguang Xiao – Manitoba Hydro	5		No	
<b>SDT response:</b>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		No	See comments from NPCC--Project 2015-04.
<b>SDT response:</b> Please see drafting team response to NPCC-Project 2015-04 comments.					
37	Erika Doot – U.S. Bureau of Reclamation	5		No	Reclamation does not agree with the drafting team's proposed incorporation of the term "Facilities" into the NERC Glossary definitions of Generator Operator and Generator Owner. As noted by the drafting team, the definition of "Facilities" is ambiguous and in need of revision. Reclamation recommends that the terms Generator Operator and Generator Owner be placed in Category 2 and remain unchanged until the definition of Facility is improved so the impacts of the change in definition can be better understood.
<b>SDT response:</b> Thank you for your comments. Given the purpose of the project, the drafting team believes it appropriate to align the existing definitions as part of Phase 1 of this project.					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	We would like to see phase 2 of this project add language to this definition such as: “Not to be confused with the actual operating personnel running the generating Facility(ies)”. The intent being to clarify that the reference is to the “function” and not the “personnel”.
<b>SDT response:</b> Thank you for your comments. At this time, during Phase 2 of this project, the team does not anticipate submitting a SAR proposing to modify the definition of Generator Operator. The team notes that it does anticipate submitted a SAR recommending revisions to the definition of “Facility.” To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR proposing revisions to the definition of Generator Operator.					

#	Commenter Organization	Segment	Group name	Y/N	Comment
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		No	Considering the definition of Facility given in the Glossary, a TOP operating a synchronous condenser or a shunt compensator, which generates Mvars, could potentially qualify as operating a “generating Facility”, therefore being under the obligation to register as a GOP?
<p><b>SDT response:</b> The alignment revisions replaced the undefined term (unit) with a defined term (Facility), which provides greater clarity in the context of the FERC-approved definition of BES and aligns with the definition of Generator Operator in Appendix 5B of the Rules of Procedure. Alignment of definitions in the ROP and Glossary supports the goal, outlined in Section 501 of the Rules of Procedure, for clear and consistent identification of those entities that are responsible for compliance with the approved Reliability Standards. The definition of GOP in the NERC Glossary only relates to <i>who</i> must comply with the requirements in the Reliability Standards. It does not relate to the facilities subject to those requirements. The drafting team determined that the proposed modification to the Glossary definition would not have an effect on who would be considered a GOP. That is, the same entities that would meet the current definition of GOP would also meet the revised definition.</p> <p>Additionally, the drafting team notes that as part of Phase 2, the team will submit a SAR recommending revisions to the definition of “Facility.” The drafting team highly encourages you to attend the next drafting team meeting, which will focus on development of the SAR and Phase 2 recommendations.</p>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<p><b>SDT response:</b></p>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	Yes	
<p><b>SDT response:</b></p>					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	Although we are in agreement with the alignment of terms with the ROP, we feel the term "Facilities" is too general or ambiguous when related to generation.
<p><b>SDT response:</b> Thank you for your support with the alignment revisions. The drafting team notes that as part of Phase 2, the team will submit a SAR recommending revisions to the definition of “Facility.” The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations and SARs.</p>					
43	Kathleen Black –	3,4,5		No	Agree with PSEG comments.

#	Commenter Organization	Segment	Group name	Y/N	Comment
	DTE Energy				
<b>SDT response:</b>					
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	Although we are in agreement with the alignment of terms with the ROP, we feel the term "Facilities" is too general or ambiguous when related to generation.
<b>SDT response:</b> Thank you for your support with the alignment revisions. The drafting team notes that as part of Phase 2, the team will submit a SAR recommending revisions to the definition of "Facility." The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations and SARs.					
45	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	
<b>SDT response:</b>					
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
50	John Pearson – On Behalf of: Michael Puscas, ISO New England, Inc.	2		Yes	There needs to be total consistency between all fundamental documents within NERC. Thus, while ISO New England does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model.
<p><b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					

**End of Report**

# Consideration of Comments

## Term 18: Generator Owner

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** 2015-04 - Alignment of Terms - Term 18: Generator Owner

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

#### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

#### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 18: Generator Owner (redline)**

Generator Owner:

Entity that owns and maintains generating Facility(ies)~~units~~.

The SDT is proposing to revise the Glossary definition to align with the ROP. This is because the term “unit” (used in the current Glossary definition) is not a NERC defined term, and thus introduces the possibility of inconsistent use or application of the definition. The ROP definition provides greater clarity because it uses the term “Facility(ies),” which is defined by NERC as, “a set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.).” (See also, [NERC Limited Answer to RBR Comments](#), pp. 6-7: “Finally, NERC’s proposed changes to the definitions of “Generator Owner” and “Generator Operator” which include replacing the undefined term “generating units” with the term “Facilities,” are appropriate. The term “Facilities” is defined in the NERC Glossary as a Bulk Electric System element, which ties in directly to the new BES definition. Use of the term “Facilities” has allowed NERC to eliminate the Part III threshold criteria and use the new Bulk Electric System core definition, inclusions and exclusions to identify Bulk Electric System generator assets.”)

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Kathy Caignon – City of Vineland	3		Yes	
<b>SDT response:</b>					
3	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
4	Leonard Kula – Independent Electricity System Operator	2		Yes	We agree with the proposed changes, but suggest to also change the definition in the Functional Model to achieve total consistency.
<p><b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
5	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		No	The grammar of this definition does not appear to be correct. Seminole suggests “Entity that owns and maintains a generating Facility(ies).
<p><b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Generator Owner, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR proposing revisions to the definition of Generator Owner.</p>					
6	John Seelke – PSEG	1,2,5,6	PSEG	No	See comments provided for Term 18 previously.
<p><b>SDT response:</b> Please see drafting team response to your comments for Term 17: Generator Operator.</p>					
7	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<p><b>SDT response:</b></p>					
8	Thomas Foltz – AEP	5		Yes	
<p><b>SDT response:</b></p>					
9	Dennis Minton –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Florida Keys Electric Cooperative Assoc.				
<b>SDT response:</b>					
10	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
11	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b>SDT response:</b>					
12	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	No	Considering the definition of Facility given in the Glossary, a TO owning a synchronous condenser or shunt compensator, which generates Mvars, could potentially qualify as owning a “generating Facility”. Would the TO, therefore, be under an obligation to register as a GO? Even though Footnote 4 on page 7 preceding mentions that “the clarity and content of the current definition could be improved”, and a SAR will be drafted, this should be taken care of now under this project.
<p><b>SDT response:</b> The alignment revisions replaced the undefined term (unit) with a defined term (Facility), which provides greater clarity in the context of the FERC-approved definition of BES and aligns with the definition of Generator Owner (GO) in Appendix 5B of the Rules of Procedure. Alignment of definitions in the ROP and Glossary supports the goal, outlined in Section 501 of the Rules of Procedure, for clear and consistent identification of those entities that are responsible for compliance with the approved Reliability Standards. The definition of GO in the NERC Glossary only relates to <i>who</i> must comply with the requirements in the Reliability Standards. It does not relate to the facilities subject to those requirements. The drafting team determined that the proposed modification to the Glossary definition would not have an effect on who would be considered a GO. That is, the same entities that would meet the current definition of GO would also meet the revised definition.</p> <p>Additionally, the drafting team notes that as part of Phase 2, the team will submit a SAR recommending revisions to the definition of “Facility.” The drafting team highly encourages you to attend the next drafting team meeting, which will focus on development of the SAR and Phase 2 recommendations.</p>					
13	Joe O'Brien –	6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	NiSource - Northern Indiana Public Service Co.				
<b>SDT response:</b>					
14	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<b>SDT response:</b>					
15	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
16	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary definition.  For form consistency with the Generator Operator definition and other registered entity type definitions in the Glossary, we recommend starting the definition with “The entity that...” rather than “Entity that...”.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that, when possible, there should be consistency in sentence structure throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					
17	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
18	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.					

#	Commenter Organization	Segment	Group name	Y/N	Comment
19	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<p><b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a></p>					
20	John Allen – City Utilities of Springfield, Missouri	4		Yes	
<p><b>SDT response:</b></p>					
21	Jeremy Voll –	3		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Basin Electric Power Cooperative				
<b>SDT response:</b>					
22	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
23	Si Truc Phan – Hydro-Quebec TransEnergie	1		No	Considering the definition of Facility given in the Glossary, a TO owning a synchronous condenser or shunt compensator, which generates Mvars, could potentially qualify as owning a “generating Facility”. Would the TO, therefore, be under an obligation to register as a GO? Even though Footnote 4 on page 7 preceding mentions that “the clarity and content of the current definition could be improved”, and a SAR will be drafted, this should be taken care of now under this project.
<b>SDT response:</b>					
24	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model.
<b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					
25	Heather Morgan – EDP Renewables North America LLC	5		No	Generator Owner: Entity that owns and maintains generating Facility(ies)
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
26	Shawna Speer – Colorado Springs Utilities	1		Yes	
<b>SDT response:</b>					
27	Linda Jacobson-Quinn – City of Farmington	3			FEUS agrees with the term but recognizes it also used in the NERC Functional Model. The NERC Functional Model should be modified to align with the Glossary of Terms.
<p><b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
28	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
29	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
30	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
31	Alex Ybarra –	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Public Utility District No. 2 of Grant County, Washington				
<b>SDT response:</b>					
32	Mike Smith – Manitoba Hydro	1		No	Inconsistent approach is used for referencing defined terms with different suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility(ies)".  Note that this inconsistency extends to multiple Glossary of Terms definitions that are not currently addressed in this project.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of suffixes throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					
33	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
34	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b>SDT response:</b>					
35	Yuguang Xiao – Manitoba Hydro	5		No	
<b>SDT response:</b>					
36	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
37	Martin Boisvert – Hydro-Quebec TransEnergie	1		No	
<b>SDT response:</b>					
38	Erika Doot – U.S. Bureau of Reclamation	5		No	Reclamation does not agree with the drafting team's proposed incorporation of the term "Facilities" into the NERC Glossary definitions of Generator Operator and Generator Owner. As noted by the drafting team, the definition of "Facilities" is ambiguous and in need of revision. Reclamation recommends that the terms Generator Operator and Generator Owner be placed in Category 2 and remain unchanged until the definition of Facility is improved so the impacts of the change in definition can be better understood.
<b>SDT response:</b> Thank you for your comments. Given the purpose of the project, the drafting team believes it appropriate to align the existing definitions as part of Phase 1 of this project. Additionally, the drafting team notes that as part of Phase 2, the team will submit a SAR recommending revisions to the definition of "Facility." The drafting team highly encourages you to attend the next drafting team meeting, which will focus on development of the SAR and Phase 2 recommendations.					
39	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	
<b>SDT response:</b>					
40	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		No	Considering the definition of Facility given in the Glossary, a TO owning a synchronous condenser or a shunt compensator, which generates Mvars, could potentially qualify as owning a "generating Facility", therefore being under the obligation to register as a GO?
<b>SDT response:</b> The alignment revisions replaced the undefined term (unit) with a defined term (Facility), which provides greater clarity in the context of the FERC-approved definition of BES and aligns with the definition of Generator Owner (GO) in Appendix 5B of the Rules of Procedure. Alignment of definitions in the ROP and Glossary supports the goal, outlined in Section 501 of the Rules of Procedure, for clear and consistent identification of those entities that are responsible for compliance with the approved Reliability Standards. The definition of GO in the NERC Glossary only relates to <i>who</i> must comply with the requirements in the Reliability Standards. It does not relate to the facilities subject to those requirements. The drafting team determined that the proposed modification to the Glossary definition would not have an effect on who would be considered a GO. That is, the same entities that would meet the current definition of GO would also meet the revised definition.					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>Additionally, the drafting team notes that as part of Phase 2, the team will submit a SAR recommending revisions to the definition of "Facility." The drafting team highly encourages you to attend the next drafting team meeting, which will focus on development of the SAR and Phase 2 recommendations.</p>					
41	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<p><b>SDT response:</b></p>					
42	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	Yes	
<p><b>SDT response:</b></p>					
43	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	Although we are in agreement with the alignment of terms with the ROP, we feel the term "Facilities" is too general or ambiguous when related to generation.
<p><b>SDT response:</b> Thank you for your support with the alignment revisions. The drafting team notes that as part of Phase 2, the team will submit a SAR recommending revisions to the definition of "Facility." The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations and SARs.</p>					
44	Kathleen Black – DTE Energy	3,4,5		No	Agree with PSEG comments.
<p><b>SDT response:</b></p>					
45	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	Although we are in agreement with the alignment of terms with the ROP, we feel the term "Facilities" is too general or ambiguous when related to generation.
<p><b>SDT response:</b> Thank you for your support with the alignment revisions. The drafting team notes that as part of Phase 2, the team will submit a SAR recommending revisions to the definition of "Facility." The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations and SARs.</p>					
46	Jared Shakespeare –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Peak Reliability				
<b>SDT response:</b>					
47	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
48	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
49	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	
<b>SDT response:</b>					
50	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<b>SDT response:</b>					

**End of Report**

# Consideration of Comments

## Term 20: Interchange Authority

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 20: Interchange Authority

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

#### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

#### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
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Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 20: Interchange Authority (redline)**

Interchange Authority:

The responsible entity that authorizes the implementation of valid and balanced Interchange Schedules between Balancing Authority Areas, and ensures communication of Interchange information for reliability assessment purposes.

The SDT is recommending errata changes to both the Glossary and ROP definitions, as follows:

- (1) For the Glossary, add the word “the” to align with the ROP definition.
- (2) For the ROP, remove the “s” from “communications” to align with the Glossary definition.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	While we agree with adding the word “the” to the definition, the definition itself is not consistent with that in the Functional Model.  We commented on the SAR to suggest that there needs to be total consistency between all fundamental documents within NERC. We therefore suggest the SDT to revise the Functional Model, or to adopt the definition provided in the Functional Model in the NERC Glossary and the RoP.
<b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
<b>SDT response:</b>					
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b>SDT response:</b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b>					
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015- 04	No	[1] Regarding communication, suggest revising the definition to read: The responsible entity that authorizes the implementation of valid and balanced Interchange Schedules between Balancing Authority Areas, and ensures the communication of Interchange information for reliability assessment purposes.  [2] “Interchange Coordinator” would be more a more consistent title to be used with the definition. A “Coordinator” can authorize. We recognize that this is a substantive change that must be addressed.
<b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Interchange Authority, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. However, to the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.					
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<b>SDT response:</b>					
13	Andrew Puztai – American Transmission Company, LLC	1		Yes	
<b>SDT response:</b>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	For alignment purposes, we agree with the proposed change to the Glossary definition.

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>[1] For form consistency with other entity type definitions contained in the Glossary, we recommend starting the definition with “The entity that...” rather than “The responsible entity that...”.</p> <p>[2] It is unclear if the Interchange Authority definition needs to remain in the Glossary given NERC actions taken earlier this year to remove Interchange Authorities from the NERC Compliance Registry. However, we recognize that removal of the term from the Glossary may be beyond the scope of this project.</p>

**SDT response:**

[1] Thank you for your comments. The drafting team agrees that, when possible, there should be consistency in sentence structure throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.

[2] The Risk-Based Registration initiative removed the Interchange Authority from the NERC Compliance Registry, as explained in further detail in the [RBR Petition](#). Nevertheless, the defined term “Interchange Authority” remains in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove the defined term from the NERC Glossary until that defined term is in fact no longer used in the Reliability Standards.

During Phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters.

16	Jared Shakespeare – Peak Reliability	1		No	This terms should be retired as its no longer a registered function.
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**SDT response:** Thank you for your comment; however, retiring the definition is outside the scope of work for this project. The drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. Other than alignment revisions, the drafting team was not at liberty to revise the definitions. The drafting team notes that the Risk-Based Registration initiative removed the Interchange Authority from the NERC Compliance Registry, as explained in further detail in the [RBR Petition](#). Nevertheless, the defined term “Interchange Authority” remains in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove the defined term from the NERC Glossary until that defined term is in fact no longer used in the Reliability Standards.</p> <p>During Phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters.</p>					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<p><b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.</p>					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort,</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.
<b>SDT response:</b> Please see the drafting team response to your comment for Term 4: Blackstart Resource.					
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	
<b>SDT response:</b>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model.
<b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and					

#	Commenter Organization	Segment	Group name	Y/N	Comment
incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<b>SDT response:</b>					
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
<b>SDT response:</b>					
26	Linda Jacobson-Quinn – City of Farmington	3		No	The NERC Functional Model changed the Interchange Authority to Interchange Coordinator noting it better reflects the nature of the entity. Additionally, the NERC Functional Model defines the Interchange Coordinator as "The functional entity that ensures communication of Arranged Interchange for reliability evaluation purposes and coordinates implementation of valid and balanced Confirmed Interchange between Balancing Authority Areas." FEUS recommends ensuring the Functional Model, RoP, and Glossary are all in alignment.
<b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
28	Yvonne McMackin –	4		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Public Utility District No. 2 of Grant County, Washington				
<b>SDT response:</b>					
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		Yes	
<b>SDT response:</b>					
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b>SDT response:</b>					
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b><u>SDT response:</u></b>					
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b><u>SDT response:</u></b>					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b><u>SDT response:</u></b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	
<b><u>SDT response:</u></b>					
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<b><u>SDT response:</u></b>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<b><u>SDT response:</u></b>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b>					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
45	Jared Shakespeare – Peak Reliability	1		Yes	Is the IA definition still needed if the risk-based registration project did away with it?
<p><b>SDT response:</b> The Risk-Based Registration initiative removed the Interchange Authority from the NERC Compliance Registry, as explained in further detail in the <a href="#">RBR Petition</a>. Nevertheless, the defined term “Interchange Authority” remains in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove the defined term from the NERC Glossary until that defined term is in fact no longer used in the Reliability Standards.</p> <p>During Phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters.</p>					
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
47	Bernard Johnson –	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Oglethorpe Power Corporation				
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	While Duke Energy agrees that the proposed alignment appears correct, we seek justification on the necessity of aligning this term since FERC has approved the removal of Interchange Authority from the Compliance Registry.
<p><b>SDT response:</b> The Risk-Based Registration initiative removed the Interchange Authority from the NERC Compliance Registry, as explained in further detail in the <a href="#">RBR Petition</a>. Nevertheless, the defined term “Interchange Authority” remains in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove the defined term from the NERC Glossary until that defined term is in fact no longer used in the Reliability Standards.</p> <p>During Phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters.</p>					
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<b>SDT response:</b>					
50	Steven Rueckert – Western Electricity Coordinating Council -	10		Yes	I agree with the revisions, but question the need for the term. FERC recently approved deregistration of all PSE and IA entities. Was there any thought given to deleting the term rather than modifying it?
<p><b>SDT response:</b> Thank you for your comment; however, retiring the definition is outside the scope of work for this project. The drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. Other than alignment revisions, the drafting team was not at liberty to revise the definitions. The drafting team notes that the Risk-Based Registration initiative removed the Interchange Authority from the NERC Compliance Registry, as explained in further detail in the <a href="#">RBR Petition</a>. Nevertheless, the defined term “Interchange Authority” remains in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove the defined term from the NERC Glossary until that defined term is in fact no longer used in the Reliability Standards.</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
					During Phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters.

**End of Report**

# Consideration of Comments

## Term 24: Interconnected Operations Service

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 24: Interconnected Operations Service

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

#### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

#### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 24: Interconnected Operations Service (redline)**

Interconnected Operations Service:

A service (exclusive of basic energy and ~~transmission-Transmission services~~Services) that is required to support the ~~reliable~~ Reliable operation-Operation of interconnected Bulk Electric Systems.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the terms “Transmission Services” and “Reliable Operation” because these terms are defined in the Glossary, and their usage in this definition narrative is intended to have the meaning of the defined terms.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
<b>SDT response:</b>					
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b>SDT response:</b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b>SDT response:</b>					
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	Yes	
<b>SDT response:</b>					
12	Joe O'Brien –	6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	NiSource - Northern Indiana Public Service Co.				
<b>SDT response:</b>					
13	Andrew Puztai – American Transmission Company, LLC	1		Yes	
<b>SDT response:</b>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>The IOS definition appears to have been taken from a NERC reference document that was developed in 2001 and filed with FERC under docket No. RM01-12, Electricity Market Design and Structure. It is a vague definition, and since it is used in the definition of Generator Operator, also impacts that definition. We suggest the SDT consider drafting a SAR to improve the clarity and content of the IOS definition.</p>
<b>SDT response:</b> Thank you for your comments; however, the drafting team did not identify Interconnected Operations Service as one of the terms for which it will develop a SAR. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.					
16	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.					

#	Commenter Organization	Segment	Group name	Y/N	Comment
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<p><b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a></p>					
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	
<p><b>SDT response:</b></p>					
20	Jeremy Voll –	3		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Basin Electric Power Cooperative				
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	Comments provided in the attached file.
<b>SDT response:</b> <a href="#">The drafting team did not receive additional comments.</a>					
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<b>SDT response:</b>					
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
<b>SDT response:</b>					
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	
<b>SDT response:</b>					
27	Dan Wilson –	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	PPL Electric Utilities Corporation				
<b>SDT response:</b>					
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		Yes	
<b>SDT response:</b>					
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
<b>SDT response:</b>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	<p>We agree with the alignment. However either here or in phase 2, the reference to “interconnected Bulk Electric Systems” seems confusing.</p> <p>Is the service referring to “multiple” Bulk Electric Systems within an interconnection or is there only “one” Bulk Electric System in the interconnection? Or is it one Bulk Electric System with multiple interconnections? Perhaps the definition should refer to “...Reliable Operation of the interconnected Bulk Electric System.” Please review.</p>
<p><b>SDT response:</b> The drafting team appreciates your comments and believes that the definition could be more clear. However, the proposed revisions fall outside the permissible scope of work for this project. As part of Phase 1 for this project, the drafting team identified all existing defined terms that are contained in both the Glossary and the ROP (“cross-over terms”), and to the extent there were definitional differences, proposed alignment revisions where appropriate. For the term IOS, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. It is important to point out that the revisions were limited to alignment – the drafting team simply revised the Glossary definition by adopting the existing language in the ROP definition. If you believe</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>revisions should be made to the definition of IOS to clarify the reference to the “interconnected BES,” the drafting team suggests submitting a Standards Authorization Request (SAR) outlining how the existing language could be revised to provide greater clarity regarding the intended meaning and definition application.</p> <p>Additionally, the drafting team notes that during the Phase 1 work, a number of questions were raised regarding inconsistent or improper usage of the terms Bulk Electric System (BES) and Bulk Power System (BPS). During Phase 2, the drafting team will consider recommending that an effort is undertaken to review and assess usage of the terms BES and BPS throughout the Reliability Standards, Glossary, and ROP to ensure proper usage and application given the particular context.</p>					
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<b>SDT response:</b>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<b>SDT response:</b>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	<p>[1] This term should either end with “an Interconnection” or “the Bulk Electric System” (singular). This alignment should be made to the ROP as well.</p> <p>[2] Also, Transmission Services by NERC definition, implies ancillary services are included since it involves “services...to move energy from a Point of Receipt to a Point of Delivery.” The FERC pro forma tariff requires a number of ancillary services including reactive supply, voltage control imbalance, regulation, frequency response, and operating reserve, which may be required “to move energy from a Point of Receipt to a Point of Delivery.” Thus, by capitalizing Transmission Service, the definition changes the meaning of Interconnected Operations Service, and may change the meaning by excluding all Ancillary Services. The application of the requirements that use this term may also be altered.</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p><b>SDT response:</b></p> <p>[1] The drafting team appreciates your comments and believes that the definition could be clearer. However, the proposed revisions fall outside the permissible scope of work for this project. As part of Phase 1 for this project, the drafting team identified all existing defined terms that are contained in both the Glossary and the ROP (“cross-over terms”), and to the extent there were definitional differences, proposed alignment revisions where appropriate. For the term IOS, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. It is important to point out that the revisions were limited to alignment – the drafting team simply revised the Glossary definition by adopting the existing language in the ROP definition. The drafting team did not have authorization to revise the definitions outside of addressing alignment between the existing definition language in the Glossary and ROP. If you believe revisions should be made to the definition of IOS to clarify the reference to the “interconnected BES,” the drafting team suggests submitting a Standards Authorization Request (SAR) outlining how the existing language could be revised to provide greater clarity regarding the intended meaning and definition application.</p> <p>[2] It is the position of the drafting team that the revision alignments to the definition of “Interconnected Operations Service” do not impact Ancillary Services. The team notes that the term IOS does not appear in any Reliability Standards (the term is only used in other Glossary definitions). Additionally, the term “Ancillary Service” appears in only once in a Regional Reliability Standard, BAL-001-TRE-1, Section 6.2.</p>					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<p><b>SDT response:</b></p>					
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<p><b>SDT response:</b></p>					
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<p><b>SDT response:</b></p>					
44	Jared Shakespeare – Peak Reliability	1		Yes	
<p><b>SDT response:</b></p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
45	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
46	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
47	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	<p>Duke Energy suggests replacing “interconnected Bulk Electric System” with “the Bulk-Power System”.</p> <p>The NERC-defined term “Reliable Operation” includes Bulk-Power System in the definition, and we believe using the NERC-defined term “Bulk-Power System” is a better way to state “interconnected Bulk Electric Systems” since the definition of Bulk-Power System includes:</p> <p>“A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof);”</p>
<p><b>SDT response:</b> The drafting team appreciates your comments; however, the proposed revisions fall outside the permissible scope of work for this project. As part of Phase 1 for this project, the drafting team identified all existing defined terms that are contained in both the Glossary and the ROP (“cross-over terms”), and to the extent there were definitional differences, proposed alignment revisions where appropriate. For the term IOS, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. It is important to point out that the revisions were limited to alignment – the drafting team simply revised the Glossary definition by adopting the existing language in the ROP definition. If you believe revisions should be made to the definition of IOS, the drafting team suggests submitting a Standards Authorization Request (SAR) outlining any perceived issues or proposed revisions to the definition.</p> <p>Additionally, the drafting team notes that during the Phase 1 work, a number of questions were raised regarding inconsistent or improper usage of the terms Bulk Electric System (BES) and Bulk Power System (BPS). During Phase 2, the drafting team will consider recommending that an effort is undertaken to review and assess usage of the terms BES and BPS throughout the Reliability Standards, Glossary, and ROP to ensure proper usage and application given the particular context.</p>					
48	Andrea Jessup –	1,3,5,6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Bonneville Power Administration				
<b>SDT response:</b>					

**End of Report**

# Consideration of Comments

## Term 25: Interconnection

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 25: Interconnection

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

### MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

### PSEG

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

### Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 25: Interconnection (redline)**

Interconnection:

A geographic area in which the operation of Bulk Power System components is synchronized such that the failure of one or more of such components may adversely affect the ability of the operators of other components within the system to maintain Reliable Operation of the Facilities within their control. When capitalized, any one of the four major electric system networks in North America: Eastern, Western, ERCOT and Quebec.

The SDT is proposing revisions to both the Glossary and ROP definitions (effective no earlier than July 1, 2016). The ROP definition is broader than the Glossary because it provides a description of what constitutes an interconnection, as opposed to identifying the specific geographical areas in North America that currently constitute an interconnection. The ROP definition tracks the Federal Power Act (note it is marked with ++ indicating such). Because the Glossary limits application of the definition to the specific interconnections identified therein, it could be perceived as intended to be more limiting and/or intentionally different than the ROP definition. In order to align the two definitions, without losing the clarity provided by the FERC-approved Glossary definition, which specifically identifies the current Interconnections in North America, the SDT is proposing to combine the two definitions. However, because the recently FERC-approved Glossary definition is not effective until July 1, 2016, the SDT is proposing that the alignment revisions do not take effect until July 1, 2016, at the earliest.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Kathy Caignon – City of Vineland	3		Yes	
<b>SDT response:</b>					
3	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	No	Recommend that this term be moved to Phase 2 so that the SDT can work on improving the definition. By stating a geographic area within the proposed definition, it implies that all Standards that are used within an Interconnection

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>would be applied to any system that has separated from other synchronized entities (has islanded themselves). All BA standards would then need to be enforced. This will increase the islanded entity’s risk of complying with all Interconnection Requirements if they do become islanded.</p> <p>With the use of Bulk Power System and to maintain Reliable Operation of the Facilities in the same sentence, the Project Team is sending mixed signals. The term “Facility” is directly related to the BES definition where the Bulk Power System includes the distribution of energy to end use customers, mostly outside the scope of the NERC Reliability Standards</p>
<p><b>SDT response:</b> The proposed alignment revisions do not affect functional entity registration. The drafting team notes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.</p>					
4	Leonard Kula – Independent Electricity System Operator	2		No	<p>We agree with the first part of the proposed addition to clarify the synchronized operation condition but not the qualifier on the reliable operation part, which is the fundamental objective of the Reliability Standards but not required to describe an Interconnection. We therefore suggest the definition be stated as:</p> <p>A geographic area in which the operation of Bulk Power System components is synchronized. When capitalized, any one of the four major electric system networks in North America: Eastern, Western, ERCOT and Quebec.</p>
<p><b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Interconnection, the drafting team proposed combining the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
5	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
<b>SDT response:</b>					
6	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b>SDT response:</b>					
7	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		No	Within an Interconnection, Elements and resources may be operated asynchronously as well. We propose:  "The System of Bulk Power System components that are operated asynchronously to other Systems of Bulk Power System components."
<b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Interconnection, the drafting team proposed combining the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.					
8	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
9	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
10	Rob Collins –	1, 6, 5, 3		No	For Phase 1, Vectren proposes not to align the ROP and the NERC Glossary definition of Interconnection since Bulk Power System components can be

#	Commenter Organization	Segment	Group name	Y/N	Comment
	On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.				asynchronous. We also propose not specifying in the definition, 'When capitalized'.  Vectren would like to include this term in Phase 2 so the SDT can create a more appropriate definition.
<p><b>SDT response:</b> Thank you for your comments; however, the drafting team elected to combine the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.</p>					
11	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<p><b>SDT response:</b></p>					
12	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	No	<p>The Glossary definition should align with the RoP; however, “system” should be changed to “Bulk Power System”:</p> <p>“Interconnection” means a geographic area in which the operation of Bulk Power System components is synchronized such that the failure of one or more of such components may adversely affect the ability of the operators of other components within the system Bulk Power System to maintain Reliable Operation of the Facilities within their control...</p> <p>Concerned with the phrasing “When capitalized...” When defined terms are used in Reliability Standards, they are capitalized as an indication that the term is defined in the Glossary of Terms. By utilizing the caveat that the definition is specific “when capitalized” it could only ever be defined as “...any one of the four major electric system networks in North America: Eastern, Western, ERCOT and Quebec” in a Reliability Standard. Otherwise it would not be capitalized and therefore an undefined term in the Reliability Standard. Suggest removing “When capitalized” and identify specifically or rely on context when the four major</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>electric system networks in North America are intended.</p> <p>We agree with the first part of the proposed addition to clarify the synchronized operation as a defining characteristic of an Interconnection, but do not support the additional qualifiers regarding failures and reliable operation. The additional language could be read as creating one all-inclusive interconnection because, for example, the failure of one component in the Quebec Interconnection may have adverse effects in the Eastern Interconnection.</p>
<p><b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Interconnection, the drafting team elected to combine the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). As part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.</p>					
13	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		No	<p>This is a disjointed definition which makes little or no sense and needs to either be completely rewritten or dropped from the glossary altogether</p> <p>The final phrase/sentence is just kind of hanging out there.</p>
<p><b>SDT response:</b> Thank you for your comments. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.</p>					
14	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<p><b>SDT response:</b></p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
15	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		No	The proposed change adds complexity to the term’s definition, which may have a significant impact on other references to the term within the glossary. As an example, temporarily islanded areas would meet the definition of an Interconnection, which does not meet the intent of the term or its common usage. The simple definition pending FERC approval is preferable.
<p><b>SDT response:</b> Thank you for your comments; however, the drafting team elected to combine the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). As part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.</p>					
16	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	
<p><b>SDT response:</b></p>					
17	Jared Shakespeare – Peak Reliability	1		No	We recommend removing the quotes around “wires” as it seems odd to have quotes in a definition. Also, Is the DP definition still needed if the risk-based registration project did away with it?
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of “quotes” throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.</p>					
18	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	No	We support the Comments Submitted by the Southwest Power Pool.
<p><b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.</p>					
19	Terry Bilke – Midcontinent ISO, Inc.	2		No	Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don’t have concerns with the definitions presented, this

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The “Detailed Description” section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn’t change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we’re stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It’s just not clear how this is helping and what will be the next project tackled by the team.</p>
<p><b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a></p>					
20	John Allen – City Utilities of Springfield, Missouri	4		No	See comments from SPP Standards Review Group
<p><b>SDT response:</b> <a href="#">Please see the drafting team response to the SPP Standards Review Group.</a></p>					
21	Jeremy Voll – Basin Electric Power Cooperative	3		No	Recommend that this term be moved to Phase 2 so that the SDT can work on improving the definition. By stating a geographic area within the proposed definition, it implies that all Standards that are used within an Interconnection

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>would be applied to any system that has separated from other synchronized entities (has islanded themselves). All BA standards would then need to be enforced. This will increase the islanded entity’s risk of complying with all Interconnection Requirements if they do become islanded.</p> <p>With the use of Bulk Power System and to maintain Reliable Operation of the Facilities in the same sentence, the Project Team is sending mixed signals. The term “Facility” is directly related to the BES definition where the Bulk Power System includes the distribution of energy to end use customers, mostly outside the scope of the NERC Reliability Standards.</p>
<p><b>SDT response:</b> Thank you for your comments; however, the drafting team elected to combine the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). As part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.</p>					
22	Lee Schuster – Duke Energy	3		No	
<p><b>SDT response:</b></p>					
23	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<p><b>SDT response:</b></p>					
24	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	No	<p>The SRC agrees with the first part of the proposed addition to clarify the synchronized operation as a defining characteristic of an Interconnection, but does not support the additional qualifiers regarding failures and reliable operation. These qualifiers are not essential to the definition of an Interconnection. It further suggests that, following consideration of the proposed modifications to the definition of Bulk Power System, use of the term Bulk Electric System is more appropriate. The SRC therefore suggests the definition be stated</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>as:</p> <p>A defined geographic area within which the operation of Bulk Electric System components is synchronized. When capitalized, any one of the four major electric system networks in North America: Eastern, Western, ERCOT and Quebec.</p> <p>To the extent that the SDT views this recommendation as a substantive change to the definitions, the SRC would request that this revision be addressed the later, proposed phases of this project or as noted below as part of specific standard revision processes.</p>
<p><b>SDT response:</b> Thank you for your comments; however, as noted in your comments, the proposed revisions are substantive and outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Interconnection, the drafting team elected to combine the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.</p>					
25	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<p><b>SDT response:</b></p>					
26	Shawna Speer – Colorado Springs Utilities	1		No	Reference the group comments - Colorado Springs Utilities
<p><b>SDT response:</b> Please reference the drafting team response to the comments of Colorado Springs Utilities.</p>					
27	Linda Jacobson-Quinn – City of Farmington	3		Yes	
<p><b>SDT response:</b></p>					
28	Dan Wilson –	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	PPL Electric Utilities Corporation				
<b>SDT response:</b>					
29	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
30	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
31	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
32	Mike Smith – Manitoba Hydro	1		No	Inconsistent approach is used for referencing defined terms with different suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility(ies)".  Note that this inconsistency extends to multiple Glossary of Terms definitions that are not currently addressed in this project.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of suffixes throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team encourages you to attend future Project 2015-04 meetings which will focus on development of these Phase 2 recommendations.					

#	Commenter Organization	Segment	Group name	Y/N	Comment
33	Andrew Gallo – Austin Energy	6		No	Austin Energy (AE) suggests removing “such that the failure of one or more of such components may adversely affect the ability of the operators of other components within the system to maintain Reliable Operation of the Facilities within their control” and changing “Bulk Power System” to “Bulk Electric System.” AE believes the qualifier is not appropriate and the term BPS provides issues for entities outside the U.S.
<p><b>SDT response:</b> Thank you for your comments; however, your proposed revisions are substantive in nature and outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Interconnection, the drafting team elected to combine the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). As part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.</p>					
34	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<p><b>SDT response:</b></p>					
35	Yuguang Xiao – Manitoba Hydro	5		No	
<p><b>SDT response:</b></p>					
36	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<p><b>SDT response:</b></p>					
37	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<p><b>SDT response:</b></p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
38	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
39	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	No	<p>[1] We feel that there is an inconsistent use of the terms Bulk Electric System and Bulk Power System throughout the definitions in the Glossary and ROP. There is a concern that use of Bulk Power System in the definition of Interconnection could lead to increased scope in some cases. Effectively canceling out the work done to clarify the scope through the Bulk Electric System definition work.</p> <p>[2] There is also confusion created now due to the added text in that there seems to be two cases of use of the term: capitalized and non-capitalized. However since this is a defined term, in order to link the word to the definition, it must be capitalized. Use of the non-capitalized term means that the use is not linked to the definition as stated. To increase clarity, removal of the phrase “when capitalized” should be investigated</p>
<b>SDT response:</b>					
<p>[1] The drafting team agrees that in the Reliability Standards, Glossary, and ROP there are instances of inconsistent or incorrect usage or application of the terms Bulk Electric System (BES) and Bulk Power System (BPS). Because the SAR limits this drafting team to alignment of the definitions in the Glossary and ROP, the team did not address this issue. However, during Phase 2 of this project, the drafting team will consider a recommendation that an effort is undertaken to assess usage of the BES and BPS throughout the Reliability Standards, Glossary, and ROP for the purpose of ensuring proper usage and application of the various terms given the particular context. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.</p> <p>[2] Thank you for your comments. The drafting team elected to combine the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). As part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. The drafting team will submit the SAR to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. As indicated above, the drafting team encourages you to attend the next Project 2015-04 meeting during which time the team will develop the SAR to support future revisions to this term.</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
40	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<b>SDT response:</b>					
41	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<b>SDT response:</b>					
42	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	While we are not opposed to the concept of the definition in the ROP. However, combining these two terms could be problematic because there are small hydro facilities that may be part of the Bulk Electric System that are operated at a different frequency and are asynchronous. By definition, these small hydro project would not be part of the Interconnection since they are not synchronized to the rest of the Interconnection.
<b>SDT response:</b> The proposed alignment revisions do not affect functional entity registration. Additionally, the drafting team notes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.					
43	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
44	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
45	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
46	Jared Shakespeare – Peak Reliability	1		Yes	“When capitalized, any one of the four major electric system networks in North America” should be “Currently, this term is any one of the four major electric system networks in North America.” Any term that is capitalized means the defined term.
<p><b>SDT response:</b> Thank you for your comments; however, your proposed revisions are substantive in nature and outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Interconnection, the drafting team elected to combine the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). As part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.</p>					
47	Tony Eddleman – Nebraska Public Power District	3		No	I support MRO NSRF comments.
<b>SDT response:</b>					
48	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
49	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	No	Duke Energy requests additional consideration be given to the proposed definition/alignment of the term Interconnection. The proposal appears to distort an already common understanding of the concept of the lower cased term interconnection.

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p><b>SDT response:</b> The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). As part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.</p>					
50	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<p><b>SDT response:</b></p>					
51	Steven Rueckert - Western Electricity Coordinating Council	10		Yes	I voted affirmative for the definition, but wonder why the words "such that failure of one or more of such components may adversely affect the ability of the operations of other components within the system to maintain Reliable Operation of the Facilities within their control" are needed after "synchronized". While this is a true statement there are facilities within each interconnection that probably don't affect the ability of the operations of other components but they are still within the interconnection. It seems like just stopping after "synchronized" and then including the second sentence would suffice.
<p><b>SDT response:</b> Thank you for your comments; however, your proposed revisions are substantive in nature and outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Interconnection, the drafting team elected to combine the language from the Glossary and ROP definitions into one aligned definition. The drafting team recognizes that the aligned definition could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions (other than alignment revisions). As part of Phase 2 for this project, the drafting team will consider developing a SAR to revise the definition of Interconnection to address the issues identified by team members and various commenters. If the team does decide to develop a SAR, the SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual. The drafting team <i>highly</i> encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.</p>					

**End of Report**

# Consideration of Comments

## Term 28: Load-Serving Entity

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 28: Load-Serving Entity

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 28: Load-Serving Entity (redline)**

Load-Serving Entity:

Secures energy and ~~transmission-Transmission service-Service~~ (and related Interconnected Operations Services) to serve the electrical demand and energy requirements of its end-use customers.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “Transmission Service” because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Kathy Caignon – City of Vineland	3		Yes	
<b>SDT response:</b>					
3	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
4	Leonard Kula – Independent Electricity System Operator	2		Yes	
<b>SDT response:</b>					
5	Mary Claire Yatsko –	1,3,4,5,6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Seminole Electric Cooperative, Inc.				
<b>SDT response:</b>					
6	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b>SDT response:</b>					
7	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	"Schedules energy" should replaces "Secures energy" since Schedule is a defined term.  Rather than "Secures energy", it would be more appropriate to use "Schedules energy" since "Schedule" is a defined term.
<b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Load-Serving Entity, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. However, to the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.					
8	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
9	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
10	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
11	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b>SDT response:</b>					
12	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	Yes	
<b>SDT response:</b>					
13	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<b>SDT response:</b>					
14	Andrew Puztai – American Transmission Company, LLC	1		Yes	
<b>SDT response:</b>					
15	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
16	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>[1] For form consistency with other entity type definitions contained in the Glossary, we recommend starting the definition with “The entity that secures...”.</p> <p>[2] The LSE definition also contains another Glossary term(s) that is not capitalized. Consider changing “the electrical demand and energy requirements...” to “the Electrical Energy and Demand requirements...” to properly denote these other Glossary terms. It appears that their application in the LSE definition narrative is consistent with their Glossary meaning.</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>[3] It is unclear if the Load-Serving Entity definition needs to remain in the Glossary given NERC actions taken this year to remove the Load-Serving Entity from the NERC Compliance Registry. However, we recognize that removal of the term from the Glossary may be beyond the scope of this project.</p>
<p><b>SDT response:</b></p> <p>[1] Thank you for your comments; however, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. The drafting team agrees that, when possible, there should be consistency in sentence structure throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.</p> <p>[2] The drafting team appreciates your suggestion but notes that currently the definitions are aligned. Your proposed revisions fall outside the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Load-Serving Entity, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. If you believe revisions should be made to the definition of LSE to clarify the reference to “the electrical demand and energy requirements,” the drafting team suggests submitting a Standards Authorization Request (SAR) outlining how the existing language could be revised to provide greater clarity regarding the intended meaning and definition application.</p> <p>[3] As acknowledged in your comment, revising the definition to remove references to Load-Serving Entity is outside the scope of work for this project. The drafting team notes that although the Risk-Based Registration initiative removed Load-Serving Entity from the NERC Compliance Registry, as explained in further detail in the <a href="#">RBR Petition</a> and <a href="#">Compliance Filing</a>, the term nevertheless remains in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove the defined term from the NERC Glossary until that defined term is in fact no longer used in the Reliability Standards. During phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation is needed to address the various concerns raised by commenters.</p>					
17	Jared Shakespeare – Peak Reliability	1		Yes	
<p><b>SDT response:</b></p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
18	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<b>SDT response:</b> <a href="#">Please see the drafting team response to comments submitted by the Southwest Power Pool.</a>					
19	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a>					
20	John Allen –	4		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	City Utilities of Springfield, Missouri				
<b>SDT response:</b>					
21	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
22	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
23	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
24	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	No	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model. Further, the SRC recommends that the Functional Model definition be adopted in lieu of the proposed revisions
<b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					
25	Heather Morgan –	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	EDP Renewables North America LLC				
<b>SDT response:</b>					
26	Shawna Speer – Colorado Springs Utilities	1		Yes	
<b>SDT response:</b>					
27	Linda Jacobson-Quinn – City of Farmington	3		Yes	Corresponding changes should be included in the NERC Functional Model.
<p><b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
28	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
29	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
30	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
31	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b><u>SDT response:</u></b>					
32	Mike Smith – Manitoba Hydro	1		Yes	
<b><u>SDT response:</u></b>					
33	Andrew Gallo – Austin Energy	6		Yes	
<b><u>SDT response:</u></b>					
34	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b><u>SDT response:</u></b>					
35	Yuguang Xiao – Manitoba Hydro	5		Yes	
<b><u>SDT response:</u></b>					
36	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b><u>SDT response:</u></b>					
37	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b><u>SDT response:</u></b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
38	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
39	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	We do not have issue with the stated capitalization changes to Transmission Service in the definition of Load-Serving Entity. However, the term “demand” is not capitalized and appears to be consistent with the defined term. We recommend that “demand” be reviewed in Phase 2 of this Project in order to determine if it needs to be capitalized.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
40	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<b>SDT response:</b>					
41	Robert A. Schaffeld – Southern Company – Southern Company Services, Inc.	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
42	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	[1] “Demand” is a glossary term and should either be capitalized or clarified.  [2] We ask the drafting team to provide more details on the implementation of this proposed change in the event that FERC approves retirement of the LSE function from the ROP.

**SDT response:**

[1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

[2] Although the Risk-Based Registration initiative removed Load-Serving Entity from the NERC Compliance Registry, as explained in further detail in the [RBR Petition](#) and [Compliance Filing](#), the term nevertheless remains in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove these defined terms from the NERC Glossary until the defined terms are in fact no longer used in the Reliability Standards.

During phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation to the SC is needed to address the various concerns raised by commenters.

43	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
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**SDT response:**

44	Kathleen Black – DTE Energy	3,4,5		Yes	
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**SDT response:**

#	Commenter Organization	Segment	Group name	Y/N	Comment
45	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
46	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
47	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
48	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
49	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term “Transmission” throughout the definition, as it is currently a defined term.
<b>SDT response:</b> Thank you for your comments. The drafting team notes that the “transmission” is not used as a stand-alone term in this definition. However, the team agrees that, in general, there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					
50	Andrea Jessup –	1,3,5,6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Bonneville Power Administration				
<b>SDT response:</b>					

**End of Report**

# Consideration of Comments

## Term 31: Planning Authority

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 31: Planning Authority

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 31: Planning Authority (redline)**

Planning Authority:

The responsible entity that coordinates and integrates transmission ~~facility~~ Facilities and service plans, resource plans, and ~~protection~~ Protection systems ~~Systems~~.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the terms “Facilities” and “Protection Systems” because these terms are defined in the Glossary, and their usage in this definition narrative is intended to have the meaning of the defined terms.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	While we agree with capitalizing the words “facilities” and “protection systems”, the definition is not consistent with that presented in the Functional Model. We commented on the SAR to suggest that there needs to be total consistency between all fundamental documents within NERC. We therefore suggest the SDT to revise the Functional Model, or to adopt the definition provided in the Functional Model in the NERC Glossary and the RoP.
<b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and					

#	Commenter Organization	Segment	Group name	Y/N	Comment
incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
<b>SDT response:</b>					
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b>SDT response:</b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b>					
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	No	[1] Transmission should be capitalized.  [2] Transmission Facilities should be uniquely defined. The definitions of Transmission and Facility(ies) should not have to be merged by a reader to create the Transmission Facilities definition.
<b>SDT response:</b>					
<p>[1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p> <p>[2] Thank you for your comments; however, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Planning Authority, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. The drafting team agrees that the consecutive use of two (or more) defined terms may create confusion. During Phase 2 of this project, the drafting team will consider recommendations related to sentence structure. The team will consider the issue raised in your comments in developing the Phase 2 recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations. To the extent you believe a new defined term should be created, the team suggests that you submit a SAR.</p>					
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<b>SDT response:</b>					
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>[1] For form consistency with other entity type definitions contained in the Glossary, we recommend starting the definition with “The entity that...” rather than “The responsible entity that...”.</p> <p>[2] We believe the definition is intended to mean that the PA is the entity that coordinates and integrates Transmission plans and resource plans within their PA area. Transmission plans involve the planning of new Transmission facilities, taking committed Transmission Services into account. Additionally, the coordination of Protection Systems is typically the responsibility of the asset owners within the NERC standards. We recommend revising the definition to read as follows: “The entity that coordinates and integrates Transmission plans and resource plans.”</p> <p>[3] If this type of change is considered to be beyond the scope of this project, we recommend the SDT replace “...transmission Facilities and service plans,...” in the redline with “Transmission Service and Facility plans,...” in order to recognize other defined terms that seem to fit the definition narrative but also avoid the use of conjoined terms - “Transmission Facilities”.</p>
<b>SDT response:</b>					
<p>[1] Thank you for your comments. The drafting team agrees that, when possible, there should be consistency in sentence structure throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>[2] Your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Planning Authority, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. If you believe revisions should be made to improve the definition of Planning Authority, the drafting team suggests submitting a Standards Authorization Request (SAR) outlining any perceived issues or proposed revisions to the definition.</p> <p>[3] The drafting team appreciates your suggestion but notes that currently the definitions are aligned. Your proposed revisions fall outside the permissible scope of work for this project because the revisions change the meaning of the original definition (in both the ROP and the Glossary). As stated above, if you believe revisions are needed to improve the definition clarity, the drafting team recommends that you submit a SAR.</p>					
16	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a>					
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	See comments from SPP Standards Review Group.
<b>SDT response:</b>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model.

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p><b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<p><b>SDT response:</b></p>					
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
<p><b>SDT response:</b></p>					
26	Linda Jacobson-Quinn – City of Farmington	3		No	The NERC Functional Model replaced Planning Authority with Planning Coordinator to better align it's functional obligations. The terms and functions represented in the functional model do not align with the proposed terms. In addition, in the WECC, there has been concerns over the potential Gap in Planning Coordinator Areas where facilities are not being included in a Planning Coordinator Area. A task force (PCFTF) has identified one of the key contributors to the problem is the lack of clarity and apparent contradictions between the NERC Functional Model, Rules of Procedure, and NERC Standards and Glossary. The inconsistencies need to be addressed.
<p><b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		No	Inconsistent approach is used for referencing defined terms with different suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility(ies)".  Note that this inconsistency extends to multiple Glossary of Terms definitions that are not currently addressed in this project.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of suffixes throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the					

#	Commenter Organization	Segment	Group name	Y/N	Comment
recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.					
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b>SDT response:</b>					
34	Yuguang Xiao – Manitoba Hydro	5		No	
<b>SDT response:</b>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	We agree with the stated capitalization changes. However in Phase 2, since Planning Authority no longer exists in the Functional Model, this term should be retired from the Glossary or else the definition here moved under Planning Coordinator and then place the link from the old Planning Authority term under

#	Commenter Organization	Segment	Group name	Y/N	Comment
					that definition. Simply put, move the definition stated above under Planning Coordinator, and then change the Planning Authority definition to: "See Planning Coordinator." Also unless underway already in other Projects, a SAR should be created to correct existing Standard references to Planning Coordinator.
<p><b>SDT response:</b> Your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Planning Authority, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. If you believe revisions should be made to improve the definition of Planning Authority (or Planning Coordinator), the drafting team suggests submitting a Standards Authorization Request (SAR) outlining any perceived issues or proposed revisions to the definition or Reliability Standards.</p> <p>Additionally, the drafting team notes that to the extent possible, there should be consistency of terminology across NERC documents. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<p><b>SDT response:</b></p>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		No	The responsible entity that integrates the information from a resource plan, applicable Protection Systems, load service plans, and transmission Facilities into a transmission plan.
<p><b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. For the term Planning Authority, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. The drafting team did not have authorization to revise the definitions outside of addressing alignment between the existing definition language in the Glossary and ROP. If you believe revisions should be made to the definition of Planning Authority, the drafting team suggests submitting a Standards Authorization Request (SAR) outlining any perceived issues or proposed revisions to the definition.</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	We recommend retiring the term “Planning Authority” and formally adopt “Planning Coordinator” in its place. There should not be two terms with the same meaning.
<p><b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. For the term Planning Authority, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. The drafting team did not have authorization to revise the definitions outside of addressing alignment between the existing definition language in the Glossary and ROP. If you believe revisions should be made to the definition of Planning Authority, the drafting team suggests submitting a Standards Authorization Request (SAR) outlining any perceived issues or proposed revisions to the definition.</p>					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<p><b>SDT response:</b></p>					
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<p><b>SDT response:</b></p>					
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<p><b>SDT response:</b></p>					
45	Jared Shakespeare – Peak Reliability	1		Yes	
<p><b>SDT response:</b></p>					
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
<p><b>SDT response:</b></p>					
47	Bernard Johnson –	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Oglethorpe Power Corporation				
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	
<b>SDT response:</b>					
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<b>SDT response:</b>					
50	Steven Rueckert – Western Electricity Coordinating Council	10		Yes	I voted affirmative to approve the definition, but suggest that a reference or statement that PA is the same as PC be included.
<b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. For the term Planning Authority, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. The drafting team did not have authorization to revise the definitions outside of addressing alignment between the existing definition language in the Glossary and ROP. If you believe revisions should be made to the definition of Planning Authority, the drafting team suggests submitting a Standards Authorization Request (SAR) outlining any perceived issues or proposed revisions to the definition.					

**End of Report**

# Consideration of Comments

## Term 33: Point of Receipt

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 33: Point of Receipt

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

### MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

### PSEG

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

### Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 33: Point of Receipt (redline)**

Point of Receipt:

A location that the Transmission Service Provider specifies on its transmission system where an Interchange Transaction enters or a ~~Generator~~generator delivers its output.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to remove the capitalization from the term “Generator” because it is not a defined term in Glossary or the ROP.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b><u>SDT response:</u></b>					
2	Emily Rousseau – MRO	1,2,3,4, 5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b><u>SDT response:</u></b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
<b><u>SDT response:</u></b>					
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5, 6		Yes	
<b><u>SDT response:</u></b>					
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b><u>SDT response:</u></b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b>SDT response:</b>					
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015- 04	No	Transmission System should be capitalized. Transmission System should be uniquely defined. The definitions of Transmission and System should not have to be merged by a reader to create the Transmission System definition.
<b>SDT response:</b> The drafting team agrees that the consecutive use of two (or more) defined terms may create confusion. During Phase 2 of this project, the drafting team will consider recommendations related to sentence structure. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations. To the extent you believe a new defined term (“Transmission System”) should be created, the team suggests that you submit a SAR.					
12	Joe O'Brien –	6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	NiSource - Northern Indiana Public Service Co.				
<b>SDT response:</b>					
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<b>SDT response:</b>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>We also recommend capitalization of the word “Transmission” within the Point of Receipt (POR) definition because this term is defined in the Glossary and we believe its usage in the POR definition narrative is intended to have the meaning of the defined term.</p> <p>“System” is also a defined term in the Glossary, but its use in the POR definition narrative does not appear to have the same meaning as the defined term.</p>
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
16	Jared Shakespeare –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Peak Reliability				
<b>SDT response:</b>					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<b>SDT response:</b> <a href="#">Please see the drafting team response to comments submitted by the Southwest Power Pool.</a>					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	
<b>SDT response:</b>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	
<b>SDT response:</b>					
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<b>SDT response:</b>					
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	
<b>SDT response:</b>					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		Yes	
<b>SDT response:</b>					
32	Andrew Gallo – Austin Energy	6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b>SDT response:</b>					
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
<b>SDT response:</b>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	In Phase 2, investigate whether Transmission System should be capitalized.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<p><b>SDT response:</b></p>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<p><b>SDT response:</b></p>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	“Transmission” and “System” are both defined terms and the drafting team should consider if they should be capitalized.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<p><b>SDT response:</b></p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
45	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term “Transmission” throughout the definition, as it is currently a defined term.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<b><u>SDT response:</u></b>					

**End of Report**

# Consideration of Comments

## Term 36: Reactive Power

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 36: Reactive Power

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 36: Reactive Power (redline)**

Reactive Power:

The portion of electricity that establishes and sustains the electric and magnetic fields of alternating-current equipment. Reactive ~~power~~ Power must be supplied to most types of magnetic equipment, such as motors and transformers. It also must supply the reactive losses on transmission facilities. Reactive ~~power~~ Power is provided by generators, synchronous condensers, or electrostatic equipment such as capacitors and directly influences electric system voltage. It is usually expressed in kilovars (kvar) or megavars (Mvar).

**The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “Power” because “Reactive Power” is a defined term and its usage in this definition narrative is intended to have the meaning of the defined term.**

**Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.**

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Emily Rousseau – MRO	1,2,3,4, 5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
3	Leonard Kula – Independent Electricity System Operator	2		No	We do not agree with the proposed revisions as it fall short of including the Reliability Coordinator. We suggest to add “and Reliability Coordinator’s” after each of the “Transmission Operator’s” since in EOP-006-2, the RC’s restoration plan also requires the utilization of Blackstart Resources.
<b>SDT response:</b> <a href="#">These comments do not pertain to the revisions made to Reactive Power. The drafting team refers to the response to comments for Term 4 – Blackstart Resource.</a>					
4	Mary Claire Yatsko –	1,3,4,5, 6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Seminole Electric Cooperative, Inc.				
<b>SDT response:</b>					
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b>SDT response:</b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b>SDT response:</b>					
11	Lee Pedowicz –	10	NPCC--Project 2015-04	No	[1] Transmission Facilities should be capitalized. Transmission Facilities should be uniquely defined. The definitions of Transmission and Facility(ies) should not have

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Northeast Power Coordinating Council				to be merged by a reader to create the Transmission Facilities definition.  [2] Should the “k” in kvar be capitalized?
<p><b>SDT response:</b>                      [1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p> <p>[2] The International System of Units provides that a lowercase “k” is used to indicate kilo.</p>					
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<p><b>SDT response:</b></p>					
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<p><b>SDT response:</b></p>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		No	The proposed change to the term uses the term to define itself. The first sentence of the NERC Glossary term for Reactive Power is sufficient. This would be simple and in line with the definition for Real Power.
<p><b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Reactive Power, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. However, to the extent that you believe the issues</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR proposing revisions to the definition of Reactive Power.</p>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>[1] We also recommend capitalization of the word “Transmission” within the Reactive Power definition because this term is defined in the Glossary and we believe its usage in the Reactive Power definition narrative is intended to have the meaning of the defined term.</p> <p>[2] “Facilities” is also a defined term (Facility), although capitalizing it will create a conjoined term - “Transmission Facilities”.</p> <p>[3] We also recommend capitalizing “system” - replace “electric system voltage” with “electric System voltage”.</p> <p>[4] Recommend changing “kvar” to “kVAr”, and “Mvar” to “MVAR”.</p>
<p><b>SDT response:</b></p> <p>[1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p> <p>[2] See response to [1] above.</p> <p>[3] See response to [1] above.</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
[4] With the proposed revisions to the Glossary, the definitions in the ROP and Glossary are aligned.					
16	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort,</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.
<b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a>					
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	See comments from SPP Standards Review Group.
<b>SDT response:</b>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	Comments provided in the attached file.
<b>SDT response:</b> <a href="#">Attached comments were not received.</a>					
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
<b>SDT response:</b>					
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	
<b>SDT response:</b>					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b>SDT response:</b>					
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
<b>SDT response:</b>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	In Phase 2, investigate whether Transmission and/or Facilities should be capitalized.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term;					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<b>SDT response:</b>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<b>SDT response:</b>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	“Transmission” and “Facilities” are both defined terms and the drafting team should consider if they should be capitalized.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
42	Andy Bolivar –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	NextEra Energy - Florida Power and Light Co.				
<b>SDT response:</b>					
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
45	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the terms “Transmission” and “Facilities” throughout the definition, as they are currently defined terms.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<p><b><u>SDT response:</u></b></p>					

**End of Report**

# Consideration of Comments

## Term 37: Real Power

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 37: Real Power

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 37: Real Power (redline)**

Real Power:

The portion of electricity that supplies energy to the ~~load~~Load.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “load” in the Glossary because it is a defined term and its usage in this definition narrative is intended to have the meaning of the defined term. In the definition narrative of Real Power, use of the word load is intended to mean an end-use device or customer.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b><u>SDT response:</u></b>					
2	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b><u>SDT response:</u></b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
<b><u>SDT response:</u></b>					
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
<b><u>SDT response:</u></b>					
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b><u>SDT response:</u></b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b><u>SDT response:</u></b>					
7	Thomas Foltz – AEP	5		Yes	
<b><u>SDT response:</u></b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b><u>SDT response:</u></b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b><u>SDT response:</u></b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b><u>SDT response:</u></b>					
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015- 04	Yes	
<b><u>SDT response:</u></b>					
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b>					
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<b>SDT response:</b>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	
<b>SDT response:</b>					
16	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<b>SDT response:</b> <a href="#">Please see the drafting team response to comments submitted by the Southwest Power Pool.</a>					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a>					
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	
<b>SDT response:</b>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Hydro-Quebec TransEnergie				
<b>SDT response:</b>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	Comments provided in the attached file.
<b>SDT response:</b> <a href="#">Attached comments were not received.</a>					
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<b>SDT response:</b>					
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
<b>SDT response:</b>					
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	
<b>SDT response:</b>					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b><u>SDT response:</u></b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b><u>SDT response:</u></b>					
31	Mike Smith – Manitoba Hydro	1		Yes	
<b><u>SDT response:</u></b>					
32	Andrew Gallo – Austin Energy	6		Yes	
<b><u>SDT response:</u></b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b><u>SDT response:</u></b>					
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
<b><u>SDT response:</u></b>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b><u>SDT response:</u></b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	
<b>SDT response:</b>					
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<b>SDT response:</b>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<b>SDT response:</b>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	Yes	
<b>SDT response:</b>					
42	Andy Bolivar –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	NextEra Energy - Florida Power and Light Co.				
<b>SDT response:</b>					
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
45	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	
<b>SDT response:</b>					
49	Andrea Jessup –	1,3,5,6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Bonneville Power Administration				
<b>SDT response:</b>					

**End of Report**

# Consideration of Comments

## Term 38: Reliability Coordinator

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 38: Reliability Coordinator

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 38: Reliability Coordinator (redline)**

Reliability Coordinator:

The entity that is the highest level of authority who is responsible for the ~~reliable-Reliable operation-Operation~~ of the Bulk Electric System, has the Wide Area view of the Bulk Electric System, and has the operating tools, processes and procedures, including the authority to prevent or mitigate emergency operating situations in both next-day analysis and real-time operations. The Reliability Coordinator has the purview that is broad enough to enable the calculation of Interconnection Reliability Operating Limits, which may be based on the operating parameters of transmission systems beyond any Transmission Operator’s vision.

**The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “Reliable Operation” because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.**

**Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.**

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b><u>SDT response:</u></b>					
2	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b><u>SDT response:</u></b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
<b><u>SDT response:</u></b>					
4	Mary Claire Yatsko –	1,3,4,5,6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Seminole Electric Cooperative, Inc.				
<b>SDT response:</b>					
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b>SDT response:</b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b>SDT response:</b>					
11	Lee Pedowicz –	10	NPCC--Project 2015-04	No	Transmission Systems should be capitalized because both are terms defined in the NERC Glossary.

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Northeast Power Coordinating Council				Real-time should be capitalized.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6			
<p><b>SDT response:</b></p>					
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<p><b>SDT response:</b></p>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<p><b>SDT response:</b></p>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>We also recommend capitalization of the words “Real-time” and “Transmission” within the Reliability Coordinator (RC) definition because these terms are defined in the Glossary and we believe their usage in the RC definition narrative is intended to have the meaning of the defined terms.</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
16	Jared Shakespeare – Peak Reliability	1		Yes	
<p><b>SDT response:</b></p>					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<p><b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.</p>					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a>					
19	John Allen – City Utilities of Springfield, Missouri	4		No	See comments from SPP Standards Review Group.
<b>SDT response:</b>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not

#	Commenter Organization	Segment	Group name	Y/N	Comment
					disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model.
<p><b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<p><b>SDT response:</b></p>					
25	Shawna Speer – Colorado Springs Utilities	1		No	Reference the group comments - Colorado Springs Utilities
<p><b>SDT response:</b></p>					
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	The NERC Functional Model should be modified in order to be consistent with the NERC Glossary.
<p><b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<p><b>SDT response:</b></p>					
28	Yvonne McMackin –	4		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Public Utility District No. 2 of Grant County, Washington				
<b>SDT response:</b>					
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		Yes	
<b>SDT response:</b>					
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b>SDT response:</b>					
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	No	<p>[1] In the defined term “Reliable Operation”, the use of the phrase Bulk-Power System is used. We recommend investigating and reporting on the correct use of this phrase in the definition as it could lead to increased scope of responsibility for the Reliability Coordinator or other entities responsible for Reliable Operation. A Reliability Coordinator does not “operate the elements of the Bulk-Power System....” per its functional requirements. So using the capitalized term here is inappropriate and concludes that the RC now has operating requirements for elements and Facilities. Perhaps in Phase 2, the definition of Reliability Coordinator could be adjusted to not use the similar phrase “reliable operation”.</p> <p>The use of this phrasing is also not consistent with the definition of Reliability Standard where the Standard provides for “reliable operation of the bulk-power system” but the Reliability Coordinator is responsible for “reliable operation of the Bulk-Electric System”.</p> <p>[2] The phrase “real-time” is also used in the definition and should be reviewed for capitalization in Phase 2. Reference to the appropriate horizons such as but not limited to: Operating Horizon or Real-Time Operations Horizons in the definition would be more clear.</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p><b>SDT response:</b></p> <p>[1] Thank you for your comments. The drafting team appreciates the issues raised in your comments, and discussed the issues at great length. The drafting team recognizes that Reliability Coordinators (RCs) do not physically operate the elements of the BPS. However, the team maintains that RCs ultimately remain responsible for the reliable operation of the BES, as stated in the revised definition for Reliability Coordinator. The team believes that the proposed alignment revisions accord with the scope of responsibility for Reliability Coordinators and do not foist any operating requirements upon the Reliability Coordinator. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.</p> <p>[2] The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<p><b>SDT response:</b></p>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<p><b>SDT response:</b></p>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	“Emergency,” “Real-time,” “Transmission,” and “System” are defined terms and the drafting team should consider if they should be capitalized.
<p><b>SDT response:</b> The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
45	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
46	Tony Eddleman – Nebraska Public Power District	3		No	I support SPP comments.
<b>SDT response:</b>					
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests the use, and the capitalization of the term “Bulk-Power System” in the place of “Bulk Electric System” in the definition, as the term

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>“Reliable Operation” uses the term “Bulk-Power System” within its own definition.</p> <p>Also, we suggest capitalizing the terms “Transmission”, and “Facilities” as they are both currently defined terms.</p>
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p> <p>Additionally, the drafting team notes that during the Phase 1 work, a number of questions were raised regarding inconsistent or improper usage of the terms Bulk Electric System (BES) and Bulk Power System (BPS). During Phase 2, the drafting team will consider recommending that an effort is undertaken to review and assess usage of the terms BES and BPS throughout the Reliability Standards, Glossary, and ROP to ensure proper usage and application given the particular context.</p>					
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<p><b>SDT response:</b></p>					

**End of Report**

# Consideration of Comments

## Term 40: Reliability Standard

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 40: Reliability Standard

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
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**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

#### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

#### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

## Question

### Term 40: Reliability Standard (redline)

#### Reliability Standard:

A requirement, approved by the United States Federal Energy Regulatory Commission under ~~this~~ Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk-Power System]. The term includes requirements for the operation of existing bulk-power system [Bulk-Power System] facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation [Reliable Operation] of the bulk-power system [Bulk-Power System], but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. (In order to remain consistent with the Federal Power Act, defined terms contained in this narrative are not capitalized.)

**The SDT is proposing revisions to the FERC-approved Glossary definition to clarify that defined terms contained in the definition narrative are not capitalized in order to maintain consistency with the Federal Power Act. Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.**

Based on the industry comments received, the drafting team has made the following errata changes (below is the balloted definition with a redline of the errata changes):

#### Reliability Standard:

A requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for ~~reliable operation~~ [Reliable Operation] of the ~~bulk-power system~~ [Bulk Power System]. The term includes requirements for the operation of existing ~~bulk-power system~~ [Bulk Power System] facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for ~~reliable operation~~ [Reliable Operation] of the ~~bulk-power system~~ [Bulk Power System], but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity. (In order to remain consistent with the Federal Power Act, defined terms contained in this narrative are not capitalized.)

#### Explanation of errata changes:

In an attempt to provide clarity that the defined terms “Reliable Operation” and “Bulk Power System” were consistent with the definitions in the Federal Power Act, the drafting team originally included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the terms are defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that

repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definitions in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Kathy Caignon – City of Vineland	3		Yes	
<b>SDT response:</b>					
3	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
4	Leonard Kula – Independent Electricity System Operator	2		No	While we generally support the proposed revisions, we are unable to support the inclusion of the phrase “In order to remain consistent with the Federal Power Act,” since there are entities such as the IESO that are not under FERC’s jurisdiction. We propose to revise the note as follows:  (In order to remain consistent with published regulatory documents, defined terms contained in this narrative are not capitalized.)
<b>SDT response:</b> The drafting team agrees to remove the parenthetical sentence that you take issue with. Please see above explanation regarding the errata changes made to the definition.					
5	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		No	NERC should delete all references to the Federal Power Act throughout these revisions and “re-capitalize” NERC defined terms within all of the definitions. Seminole’s reasoning for this is that each term should have one reference only. For example, if NERC feels that the defined term “Facilities” does

#	Commenter Organization	Segment	Group name	Y/N	Comment
					not encapsulate the meaning put forth by Congress of “facilities” in the Federal Power Act, then the drafting team should revise the definition for Facilities. Referencing both the Federal Power Act and the NERC Glossary can cause confusion where legislative background can be interpreted differently than NERC definition drafting team responses and notes.
<p><b>SDT response:</b> In an attempt to provide clarity that the defined terms “Reliable Operation” and “Bulk Power System” were consistent with the definitions in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the terms are defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definitions in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p> <p>Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
6	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b>SDT response:</b>					
7	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
8	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
9	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
10	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
11	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	No	Dominion believes that all terms which are defined in the NERC Glossary should be capitalized for consistency. We do not agree that an exception, so that consistency with the Federal Power Act, should be made. If this exception is accepted, what justification would be used for not being consistent with other regulatory statutes?
<p><b>SDT response:</b> In an attempt to provide clarity that the defined terms “Reliable Operation” and “Bulk Power System” were consistent with the definitions in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the terms are defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definitions in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p> <p>Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
12	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	No	<p>[1] There is the note in the definition of Bulk Power System (Question 2) that defined terms are not capitalized to be consistent with the Federal Power Act. In this definition, that same note is made, yet terms in capitals are added in brackets. There should be consistency.</p> <p>[2] The definition of Reliability Standard in the NERC Glossary is significantly different from that in the Rules of Procedure. We recognize that this is a substantive change that must be addressed.</p>
<p><b>SDT response:</b></p> <p>[1] In an attempt to provide clarity that the defined terms “Reliable Operation” and “Bulk Power System” were consistent with the definitions in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the terms are defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definitions in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p> <p>[2] The drafting team agrees that prior to the alignment revisions proposed by this team, the definitions in the Glossary and ROP contained a number of differences. However, the team believes that the alignment revisions made to both the ROP and Glossary definitions resolve the issue.</p>					
13	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<p><b>SDT response:</b></p>					
14	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<p><b>SDT response:</b></p>					
15	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<p><b>SDT response:</b></p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
16	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	Given the statement in parenthesis at the end of the definition, we believe that retaining the capitalized terms in brackets throughout the definition adds unnecessary clutter.
<p><b>SDT response:</b> In an attempt to provide clarity that the defined terms “Reliable Operation” and “Bulk Power System” were consistent with the definitions in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the terms are defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definitions in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p>					
17	Jared Shakespeare – Peak Reliability	1		Yes	
<p><b>SDT response:</b></p>					
18	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<p><b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.</p>					
19	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don’t have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The “Detailed Description” section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a>					
20	John Allen – City Utilities of Springfield, Missouri	4		Yes	See comments from SPP Standards Review Group
<b>SDT response:</b>					
21	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
22	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
23	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
24	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	No	<p>The SRC generally supports the proposed revisions, but is unable to support the inclusion of the phrase “In order to remain consistent with the Federal Power Act [16 U.S.C. 824(o) and 18 C.F.R. 39.1].” The SRC notes that, since there are entities such as the IESO that are not under FERC’s jurisdiction, any revisions to the definition should respect the differing regulatory regimes in effect. The SRC suggests that this note be reworded as follows:</p> <p>The term does not include facilities used in the local distribution of electric energy. (In order to remain consistent with applicable regulatory authorities, defined terms contained in this narrative are not capitalized.) Note that the terms “Bulk-Power System” or “Bulk Power System” shall have the same meaning.</p>
<p><b>SDT response:</b> In an attempt to provide clarity that the defined terms “Reliable Operation” and “Bulk Power System” were consistent with the definitions in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the terms are defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definitions in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p>					
25	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<p><b>SDT response:</b></p>					
26	Shawna Speer – Colorado Springs Utilities	1		Yes	
<p><b>SDT response:</b></p>					
27	Linda Jacobson-Quinn – City of Farmington	3		Yes	
<p><b>SDT response:</b></p>					
28	Dan Wilson –	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	PPL Electric Utilities Corporation				
<b>SDT response:</b>					
29	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
30	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
31	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
32	Mike Smith – Manitoba Hydro	1		No	Proposed changes to 6 (Bulk-Power System), 40 (Reliability Standard) and 41 (Reliable Operation) relating to the Federal Power Act are not made consistently.  Redlined added text referencing the Federal Power Act should be consistently written for #6, #40, #41. Bulk-Power System should appear consistently in the definitions of #6, #40, #41. Defined terms should be written consistently. If using "reliable operation [Reliable Operation]", should also use same approach "facilities [Facility(ies)]" for all other defined terms.
<b>SDT response:</b> In an attempt to provide clarity that the defined terms “Reliable Operation” and “Bulk Power System” were consistent with the definitions in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>the terms are defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definitions in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p> <p>Additionally, the drafting team notes its agreement that there should be consistency in form, sentence structure and capitalization throughout the NERC defined terms. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address consistency issues if the existing definitions were aligned (and the issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.</p>					
33	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
34	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	In general, Texas RE recommends consistency with capitalization. Capitalization infers a term is defined in the Glossary and/or ROP.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
35	Yuguang Xiao – Manitoba Hydro	5		No	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
36	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b><u>SDT response:</u></b>					
37	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b><u>SDT response:</u></b>					
38	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b><u>SDT response:</u></b>					
39	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	
<b><u>SDT response:</u></b>					
40	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<b><u>SDT response:</u></b>					
41	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<b><u>SDT response:</u></b>					
42	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	There needs to be consistency with the use of brackets to signify Glossary/ROP terms that are intended to have the meaning of the definition in Section 215 of the Federal Power Act. The “Reliability Standard” definition uses brackets for the

#	Commenter Organization	Segment	Group name	Y/N	Comment
					terms [Reliable Operation] and [Bulk-Power System]. However, the “Bulk-Power System” definition does not use brackets and Glossary/ROP terms are lower case.
<p><b>SDT response:</b> In an attempt to provide clarity that the defined terms “Reliable Operation” and “Bulk Power System” were consistent with the definitions in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the terms are defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definitions in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p>					
43	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<p><b>SDT response:</b></p>					
44	Kathleen Black – DTE Energy	3,4,5		Yes	
<p><b>SDT response:</b></p>					
45	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<p><b>SDT response:</b></p>					
46	Jared Shakespeare – Peak Reliability	1		Yes	
<p><b>SDT response:</b></p>					
47	Tony Eddleman – Nebraska Public Power District	3		Yes	
<p><b>SDT response:</b></p>					
48	Bernard Johnson –	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Oglethorpe Power Corporation				
<b>SDT response:</b>					
49	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	No	Duke Energy seeks clarification regarding the proposed alignment of the term Reliability Standard. We feel as though additional measure could be taken to improve consistency. To improve consistency, we suggest that terms that are capitalized within a certain definition, should also be capitalized in both places. For example, if a term within the definition of Reliability Standard is capitalized in the Glossary of Terms, that same term should be capitalized in the definition of Reliability Standard within the NERC Rules of Procedure. Duke Energy also suggests, either using lower case where appropriate and delete the bracketed terms within the definition, or use the upper case of the terms and delete the unnecessary added language.
<p><b>SDT response:</b> In an attempt to provide clarity that the defined terms “Reliable Operation” and “Bulk Power System” were consistent with the definitions in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the terms are defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definitions in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p> <p>Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
50	Andrea Jessup –	1,3,5,6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Bonneville Power Administration				
<b>SDT response:</b>					
51	Patrick Brown - Canadian Electricity Association			No	Same comment as for term #6 (Bulk-Power System) above re: need for qualifier to clarify that the Federal Power Act is a U.S. statute.
<b>SDT response:</b> Thank you for your comment. In response to your concerns, the drafting team removed the parenthetical containing the reference to the Federal Power Act.					

**End of Report**

# Consideration of Comments

## Term 41: Reliable Operation

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 41: Reliable Operation

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

#### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

#### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 41: Reliable Operation (redline)**

Reliable Operation:

Operating the elements of the bulk-power system [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 cybersecurity incident, or unanticipated failure of system elements. (In order to remain consistent with the Federal Power Act, defined terms contained in this narrative are not capitalized.)

The SDT is proposing revisions to the FERC-approved Glossary definition to clarify that defined terms contained in the definition narrative are not capitalized in order to maintain consistency with the Federal Power Act.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

Based on the industry comments received, the drafting team has made the following errata changes (below is the balloted definition with a redline of the errata changes):

Reliable Operation:

Operating the elements of the ~~bulk-power system~~ [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 cybersecurity incident, or unanticipated failure of system elements. ~~(In order to remain consistent with the Federal Power Act, defined terms contained in this narrative are not capitalized.)~~

Explanation of errata changes:

In an attempt to provide clarity that the defined term “Bulk Power System” is consistent with the definition in the Federal Power Act, the drafting team originally included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Bryan Texas Utilities				
<b>SDT response:</b>					
2	Kathy Caignon – City of Vineland	3		Yes	
<b>SDT response:</b>					
3	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
4	Leonard Kula – Independent Electricity System Operator	2		No	While we generally support the proposed revisions, we are unable to support the inclusion of the phrase “In order to remain consistent with the Federal Power Act,” since there are entities such as the IESO that are not under FERC’s jurisdiction. We propose to revise the note as follows:  (In order to remain consistent with published regulatory documents, defined terms contained in this narrative are not capitalized.)
<b>SDT response:</b> <a href="#">The drafting team agrees to remove the parenthetical sentence that you take issue with. Please see above explanation regarding the errata changes made to the definition.</a>					
5	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		No	NERC should delete all references to the Federal Power Act throughout these revisions and “re-capitalize” NERC defined terms within all of the definitions. Seminole’s reasoning for this is that each term should have one reference only. For example, if NERC feels that the defined term “Facilities” does not encapsulate the meaning put forth by Congress of “facilities” in the Federal Power Act, then the drafting team should revise the definition for Facilities. Referencing both the Federal Power Act and the NERC Glossary can cause confusion where legislative background can be interpreted differently than NERC definition drafting team responses and notes.
<b>SDT response:</b> <a href="#">In an attempt to provide clarity that the defined term “Bulk Power System” is consistent with the definition in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same</a>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p> <p>Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
6	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b>SDT response:</b>					
7	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
8	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
9	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
10	Rob Collins –	1, 6, 5, 3		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.				
<b>SDT response:</b>					
11	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	No	Dominion believes that all terms which are defined in the NERC Glossary should be capitalized for consistency. We do not agree that an exception, so that consistency with the Federal Power Act, should be made. If this exception is accepted, what justification would be used for not being consistent with other regulatory statutes?
<p><b>SDT response:</b> In an attempt to provide clarity that the defined term “Bulk Power System” is consistent with the definition in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p> <p>Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
12	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	No	[1] There is the note in the definition of Bulk Power System (Question 2) that defined terms are not capitalized to be consistent with the Federal Power Act. In this definition, that same note is made, yet terms in capitals are added in brackets. There should be consistency.

#	Commenter Organization	Segment	Group name	Y/N	Comment
					[2] Cyber Security Incident should be capitalized and the words Cyber and Security should be separated as they are in the Glossary.
<p><b>SDT response:</b></p> <p>[1] In an attempt to provide clarity that the defined term “Bulk Power System” is consistent with the definition in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p> <p>Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p> <p>[2] The term Cyber Security Incident is defined differently in the ROP than it is in the Glossary. However, as outlined in the <a href="#">“Proposed Revisions to Align Cross-Over Terms”</a> document, the drafting team decided not to make alignment revisions to the definition. This is because the changes that would be necessary to align the terms would necessitate a large number of other changes that were outside the scope of the SAR for this project. However, the team provided its recommendations to NERC legal staff, and an effort was undertaken to revise the ROP to incorporate all changes necessary as a result of the Version 5 revisions. To review the proposed changes to the ROP, click <a href="#">here</a>. As outlined above, during Phase 2 of this project, the drafting team will develop recommendations to address consistency issues, including consistency in capitalization.</p>					
13	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<p><b>SDT response:</b></p>					
14	Andrew Pusztai –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	American Transmission Company, LLC				
<b>SDT response:</b>					
15	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		No	<p>The rationale to remain consistent with the FPA creates confusion when considering the definition of the term.</p> <p>It is well understood that capitalized terms in the glossary and other NERC documents refer to the glossary definition. By un-capitalizing the term it will be generally understood to not mean the NERC Glossary defined term, which is in contrast to the intent of the terms usage.</p>
<p><b>SDT response:</b> In an attempt to provide clarity that the defined term “Bulk Power System” is consistent with the definition in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p> <p>Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
16	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	Given the statement in parenthesis at the end of the definition, we believe that retaining the capitalized term in brackets in the definition adds unnecessary clutter.
<b>SDT response:</b> In an attempt to provide clarity that the defined term “Bulk Power System” is consistent with the definition in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p>					
17	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
18	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<b>SDT response:</b>					
19	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>organizations for the same word or term.</p> <p>While we say we’re stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It’s just not clear how this is helping and what will be the next project tackled by the team.</p>
<p><b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a></p>					
20	John Allen – City Utilities of Springfield, Missouri	4		Yes	
<p><b>SDT response:</b></p>					
21	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<p><b>SDT response:</b></p>					
22	Lee Schuster – Duke Energy	3		Yes	
<p><b>SDT response:</b></p>					
23	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<p><b>SDT response:</b></p>					
24	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	No	<p>The SRC generally supports the proposed revisions, but is unable to support the inclusion of the phrase “In order to remain consistent with the Federal Power Act [16 U.S.C. 824(o) and 18 C.F.R. 39.1].” The SRC notes that, since there are entities such as the IESO that are not under FERC’s jurisdiction any revisions to the definition should respect the differing regulatory regimes in effect. The SRC suggests that this note be reworded as follows:</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					The term does not include facilities used in the local distribution of electric energy. (In order to remain consistent with applicable regulatory authorities, defined terms contained in this narrative are not capitalized.) Note that the terms “Bulk-Power System” or “Bulk Power System” shall have the same meaning.
<p><b>SDT response:</b> In an attempt to provide clarity that the defined term “Bulk Power System” is consistent with the definition in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p>					
25	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<p><b>SDT response:</b></p>					
26	Shawna Speer – Colorado Springs Utilities	1		Yes	
<p><b>SDT response:</b></p>					
27	Linda Jacobson-Quinn – City of Farmington	3		Yes	
<p><b>SDT response:</b></p>					
28	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<p><b>SDT response:</b></p>					
29	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b>					
30	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
31	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
32	Mike Smith – Manitoba Hydro	1		No	<p>Proposed changes to 6 (Bulk-Power System), 40 (Reliability Standard) and 41 (Reliable Operation) relating to the Federal Power Act are not made consistently.</p> <p>Redlined added text referencing the Federal Power Act should be consistently written for #6, #40, #41.</p> <p>Bulk-Power System should appear consistently in the definitions of #6, #40, #41.</p> <p>Defined terms should be written consistently. If using "reliable operation [Reliable Operation]", should also use same approach "facilities [Facility(ies)]" for all other defined terms.</p>
<p><b>SDT response:</b> In an attempt to provide clarity that the defined term “Bulk Power System” is consistent with the definition in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
33	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
34	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	In general, Texas RE recommends consistency with capitalization. Capitalization infers a term is defined in the Glossary and/or ROP.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
35	Yuguang Xiao – Manitoba Hydro	5		No	
<b>SDT response:</b>					
36	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
37	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
38	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
39	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	There is continued question regarding the correct usage of the terms Bulk-Power System and Bulk-Electric System in both definitions, ROP, and the Functional Model. In Phase 2, effort should be made to ensure alignment is correct among these terms. We should not continue using the phrase Bulk-Power System in certain definitions just because that phrase was loosely used (and prior to the Bulk-Electric System definition work) in order 693.
<b>SDT response:</b> During the Phase 1 work, a number of questions were raised regarding inconsistent or improper usage of the terms Bulk Electric System (BES) and Bulk Power System (BPS). During Phase 2, the drafting team will consider recommending that an effort is undertaken to review and assess usage of the terms BES and BPS throughout the Reliability Standards, Glossary, and ROP to ensure proper usage and application given the particular context.					
40	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<b>SDT response:</b>					
41	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
42	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	There needs to be consistency with the use of brackets to signify Glossary/ROP terms that are intended to have the meaning of the definition in Section 215 of the Federal Power Act. The “Reliable Operation” definition uses brackets for the term [Bulk-Power System]. However, the “Bulk-Power System” definition does not use brackets and Glossary/ROP terms are lower case.
<p><b>SDT response:</b> In an attempt to provide clarity that the defined term “Bulk Power System” is consistent with the definition in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p> <p>Additionally, the drafting team notes that there should consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
43	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
44	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
45	Jennifer Losacco –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	NextEra Energy - Florida Power and Light Co.				
<b>SDT response:</b>					
46	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
47	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
48	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
49	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	No	<p>[1] See Duke Energy’s comment for Term 40, Reliability Standard.</p> <p>[2] Also, we suggest adding “NERC” and “(system and elements)” as shown below, to improve clarity.</p> <p>“Reliable Operation:</p> <p>Operating the elements of the bulk-power system [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 cybersecurity incident, or unanticipated failure of system elements. (In order to remain consistent with the Federal Power Act, NERC defined terms (system and elements) contained in this narrative are not capitalized.)”</p>
<b>SDT response:</b> In an attempt to provide clarity that the defined term “Bulk Power System” is consistent with the definition in the Federal Power Act, the drafting team included both the capitalized and lowercase form of the term. This is because the Federal Power Act does not capitalize the defined term; whereas, NERC					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>uses capitalization to indicate a term has a defined meaning. Regardless of the capitalization, however, the important point is that the term is defined in the same manner in both the Federal Power Act and the NERC Glossary. A number of commenters believe that repeating the term introduces unnecessary complication and confusion. The drafting team therefore removed the lowercase use of the term and retained the capitalized form. Also, the team removed the parenthetical sentence that explained the reason for including the lowercase use of the term. Because the definition in the Federal Power Act and the NERC Glossary are the same, these changes do not alter the meaning or application of the definition, and thus, are not substantive in nature.</p>					
50	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<p><b>SDT response:</b></p>					
51	Patrick Brown - Canadian Electricity Association			No	Same comment as for term #6 (Bulk-Power System) and term #40 (Reliability Standard) above re: need for qualifier to clarify that the Federal Power Act is a U.S. statute.
<p><b>SDT response:</b> Thank you for your comment. In response to your concerns, the drafting team removed the parenthetical containing the reference to the Federal Power Act.</p>					

**End of Report**

# Consideration of Comments

## Term 42: Reserve Sharing Group

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 42: Reserve Sharing Group

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

#### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

#### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 42: Reserve Sharing Group (redline)**

Reserve Sharing Group:

A group whose members consist of two or more Balancing Authorities that collectively maintain, allocate, and supply operating reserves required for each Balancing Authority’s use in recovering from contingencies within the group. Scheduling energy from an Adjacent Balancing Authority to aid recovery need not constitute reserve sharing provided the transaction is ramped in over a period the supplying party could reasonably be expected to load generation in (e.g., ten minutes). If the transaction is ramped in quicker (e.g., between zero and ten minutes) then, for the purposes of ~~Disturbance disturbance Control-control Performanceperformance~~, the ~~Areas-areas~~ become a Reserve Sharing Group.

The SDT is recommending changes to both the Glossary and ROP definitions. Specifically, the SDT is proposing to revise the Glossary definition by removing the capitalization for the terms “Disturbance Control Performance” and “Area” because these are not defined terms. (Note that Disturbance Control Standard and Disturbance are both defined terms). Also, in the ROP definition, the SDT is proposing removal of the unnecessary commas to align with the Glossary definition.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
<b>SDT response:</b>					
4	Mary Claire Yatsko –	1,3,4,5,6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Seminole Electric Cooperative, Inc.				
<b>SDT response:</b>					
5	John Seelke – PSEG	1,2,5,6 -	PSEG	Yes	
<b>SDT response:</b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b>SDT response:</b>					
11	Lee Pedowicz –	10	NPCC--Project 2015-04	No	Disturbance should be capitalized because it is a defined term in the NERC Glossary.

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Northeast Power Coordinating Council				
<p><b>SDT response:</b> Thank you for your comments. The drafting team did not believe the term "disturbance" was the stand-alone term within the definition of Reserve Sharing Group. The drafting team felt the term was "disturbance control performance" since this is the term utilized within the NERC Reliability Standard BAL-002. Therefore capitalization of "disturbance" would not convey the same intention as the term "disturbance control performance." To the extent that you believe "disturbance control performance" should be a defined term, the drafting team suggests submitting a SAR to address the issue.</p>					
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<p><b>SDT response:</b></p>					
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<p><b>SDT response:</b></p>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<p><b>SDT response:</b></p>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		No	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>[1] For form consistency with other entity type definitions contained in the Glossary, we recommend starting the definition with “An entity, consisting of two or more Balancing Authorities, that...” rather than “A group whose members consist of two or more Balancing Authorities that...”.</p> <p>[2] We also recommend capitalization of the terms “Operating Reserves”, “Contingencies”, and “Transaction” within the Reserve Sharing Group (RSG) definition because these terms are defined in the Glossary and we believe their usage in the RSG definition narrative is intended to have the meaning of the defined terms.</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p><b>SDT response:</b>                      [1] Thank you for your comments. The drafting team agrees that, when possible, there should be consistency in sentence structure throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations.</p> <p>[2] The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
16	Jared Shakespeare – Peak Reliability	1		Yes	
<p><b>SDT response:</b></p>					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<p><b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.</p>					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a>					
19	John Allen – City Utilities of Springfield, Missouri	4		No	See comments from SPP Standards Review Group.
<b>SDT response:</b>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Hydro-Quebec TransEnergie				
<b>SDT response:</b>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	
<b>SDT response:</b>					
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<b>SDT response:</b>					
25	Shawna Speer – Colorado Springs Utilities	1		No	Reference the group comments - Colorado Springs Utilities
<b>SDT response:</b>					
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	
<b>SDT response:</b>					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		Yes	
<b>SDT response:</b>					
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b>SDT response:</b>					
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
<b>SDT response:</b>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	No	<p>[1] We disagree with the removal of the capitalization on Disturbance in the definition. Removing the capitalization opens up the applicability to disturbances that are not bound by the clarifications afforded by using the defined term.</p> <p>[2] Also, the terms Operating Reserve, Contingency, Transaction, and Ramp are defined terms and should be reviewed for capitalization in the definition in Phase 2.</p>
<b>SDT response:</b>					
<p>[1] Thank you for your comments. The drafting team did not believe the term "disturbance" was the stand-alone term within the definition of Reserve Sharing Group. The drafting team felt the term was "disturbance control performance" since this is the term utilized within the NERC Reliability Standard BAL-002. Therefore capitalization of "disturbance" would not convey the same intention as the term "disturbance control performance." To the extent that you believe "disturbance control performance" should be a defined term, you might consider submitting a SAR outlining the issues and your proposed recommendations for resolving those issues.</p> <p>[2] The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
39	Manon Paquet –	1, 5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	On Behalf of: Roger Dufresne, Hydro-Quebec Production				
<b>SDT response:</b>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<b>SDT response:</b>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	<p>[1] “Operating Reserves,” “Contingency,” “Transaction,” and “Ramp” are defined terms and the drafting team should consider if the terms should be capitalized.</p> <p>[2] The drafting team should consider replacing “disturbance control performance” with “Disturbance Control Standard” in both the Glossary and ROP.</p>
<b>SDT response:</b>					
<p>[1] The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p> <p>[2] Your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Reserve Sharing Group, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. If you believe revisions should be made to improve the definition of Reserve Sharing Group, the drafting team suggests submitting a Standards Authorization Request (SAR) outlining any perceived issues or proposed revisions to the definition. Also, the drafting team notes that Project 2010-14.1 is currently ongoing and it is suggested that the commenter submit these recommendations to that drafting team.</p>					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
45	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
46	Tony Eddleman – Nebraska Public Power District	3		No	I support SPP comments.
<b>SDT response:</b>					
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term “Operating Reserve”, as it is currently a defined term.
<p><b>SDT response:</b> The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<b>SDT response:</b>					

**End of Report**

# Consideration of Comments

## Term 43: Resource Planner

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 43: Resource Planner

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 43: Resource Planner (redline)**

Resource Planner:

The entity that develops a long-term (generally one year and beyond) plan for the resource adequacy of specific loads (customer demand and energy requirements) within a Planning Authority ~~Area~~area.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to remove the capitalization from the term “Area” because it is not a defined term in Glossary or the ROP.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
<b>SDT response:</b>					
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
<b>SDT response:</b>					
5	John Seelke –	1,2,5,6	PSEG	Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	PSEG				
<b>SDT response:</b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b>SDT response:</b>					
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	No	Loads should be capitalized.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<b>SDT response:</b>					
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<b>SDT response:</b>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>[1] We also recommend capitalization of the terms “Adequacy”, “Loads”, and “Demand” within the Resource Planner (RP) definition because these terms are defined in the Glossary and we believe their usage in the RP definition narrative is intended to have the meaning of the defined terms.</p> <p>[2] While perhaps beyond the scope of this project, we also believe the definition should be modified to say “within a Balancing Authority Area or Planning Authority area.”</p>
<b>SDT response:</b>					
<p>[1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p> <p>[2] The drafting team agrees that the proposed revisions are outside the scope of this project. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.</p>					
16	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	No	We support the Comments Submitted by the Southwest Power Pool.
<b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a>					
19	John Allen – City Utilities of Springfield, Missouri	4		No	See comments from SPP Standards Review Group.
<b>SDT response:</b>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
23	Christina Bigelow –	2	IRC Standards Review Committee	Yes	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Electric Reliability Council of Texas, Inc.				disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model.
<p><b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<p><b>SDT response:</b></p>					
25	Shawna Speer – Colorado Springs Utilities	1		No	Reference the group comments - Colorado Springs Utilities.
<p><b>SDT response:</b></p>					
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	
<p><b>SDT response:</b></p>					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<p><b>SDT response:</b></p>					
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<p><b>SDT response:</b></p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		Yes	
<b>SDT response:</b>					
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b>SDT response:</b>					
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
<b>SDT response:</b>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	No	<p>[1] The use of the term ‘Planning Authority’ should be discontinued and replaced with Planning Coordinator to be consistent with the Functional Model. Planning Authority no longer exists as an entity in the Functional Model. See comment on the definition for Planning Authority above.</p> <p>[2] Also, in a future Phase, a SAR and new definition should be created to define Planning Coordinator Area so there is consistency with the terms Balancing Authority Area, Transmission Operator Area, and Reliability Coordinator Area. See previous comments on Planning Authority definition. Planning Coordinator Area is a term used within FAC-013-2 and FAC-014-2 for example but has no definition.</p>
<b>SDT response:</b>					
<p>[1] Your proposed revisions are outside of the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Resource Planner, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. If you believe revisions should be made to improve the definition of Resource Planner, Planning Authority or Planning Coordinator, the drafting team suggests submitting a Standards Authorization Request (SAR) outlining any perceived issues or proposed revisions to the definition or Reliability Standards.</p> <p>[2] Thank you for your comments; however, the drafting team did not identify “Planning Authority Area” as one of the terms for which it will develop a SAR. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.</p>					
39	Manon Paquet –	1, 5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	On Behalf of: Roger Dufresne, Hydro-Quebec Production				
<b>SDT response:</b>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<b>SDT response:</b>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	“Adequacy,” “Load,” and “Demand” are defined terms and the drafting team should consider if they should be capitalized.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
44	Jennifer Losacco –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	NextEra Energy - Florida Power and Light Co.				
<b>SDT response:</b>					
45	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	
<b>SDT response:</b>					
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<b>SDT response:</b>					

**End of Report**

# Consideration of Comments

## Term 48: System Operating Limit

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 48: System Operating Limit

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

### MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

### PSEG

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

### Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

#### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

#### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

## Question

### Term 48: System Operating Limit (redline)

#### System Operating Limit:

The value (such as MW, MVar, ~~A~~ amperes, ~~Frequency~~ frequency or ~~Volts~~ volts) that satisfies the most limiting of the prescribed operating criteria for a specified system configuration to ensure operation within acceptable reliability criteria.

System Operating Limits are based upon certain operating criteria. These include, but are not limited to:

- Facility Ratings (~~Applicable~~ applicable pre- and post-Contingency ~~equipment~~ Equipment Ratings or ~~facility~~ Facility ratings Ratings)
- ~~Transient~~ transient Stability stability Ratings ratings (~~Applicable~~ applicable pre- and post-Contingency ~~Stability~~ stability Limits limits)
- ~~Voltage~~ voltage Stability stability Ratings ratings (~~Applicable~~ applicable pre- and post-Contingency ~~Voltage~~ voltage Stability stability)
- ~~System~~ system Voltage voltage Limits limits (~~Applicable~~ applicable pre- and post-Contingency ~~Voltage~~ voltage Limits limits)

The SDT is proposing revisions to the Glossary definition. Specifically, the SDT is proposing to revise the Glossary definition to lowercase those terms that are not defined terms, and thus, should not be capitalized in the definition narrative.

Do you agree with the proposed Glossary definition revisions? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

Based on the industry comments received, the drafting team has made the following errata change (below is the balloted definition with a redline of the errata changes):

#### System Operating Limit:

The value (such as MW, ~~MVar~~ Mvar, amperes, frequency or volts) that satisfies the most limiting of the prescribed operating criteria for a specified system configuration to ensure operation within acceptable reliability criteria. System Operating Limits are based upon certain operating criteria. These include, but are not limited to:

- Facility Ratings (applicable pre- and post-Contingency Equipment Ratings or Facility Ratings)
- transient stability ratings (applicable pre- and post-Contingency stability limits)
- voltage stability ratings (applicable pre- and post-Contingency voltage stability)
- system voltage limits (applicable pre- and post-Contingency voltage limits)

Explanation of errata change:

The drafting team made an alignment revision by changing “MVar” to “Mvar.” This change aligns the Glossary definition with the ROP definition. The capitalization change is an errata change, not a substantive change.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Emily Rousseau – MRO	1,2,3,4,5, 6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
<b>SDT response:</b>					
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
<b>SDT response:</b>					
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b>SDT response:</b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz –	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	AEP				
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b>SDT response:</b>					
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	No	“Facility Ratings” and “Equipment Ratings” should be capitalized in the Rules of Procedure to match the Glossary.
<b>SDT response:</b> The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions. The terms “Facility Ratings” and “Equipment Ratings” are not defined terms in the ROP, and therefore the drafting team did not make these capitalization revisions to the ROP definition. As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b>					
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<b>SDT response:</b>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>[1] We also recommend changing “MVar” to “MVAR”.</p> <p>[2] The following suggestions may be beyond the scope of this project: 1) consider adding “MVA” to the examples of measured values contained in the first parenthetical; 2) consider removing “Equipment Ratings” from the first bulleted item. By definition, a Facility Rating should take into consideration the most limiting Equipment Rating of any equipment comprising the Facility. We also support the recommendation made by the Project 2015-03 Standard Drafting Team that a “FAC standards project develop revisions to the SOL definition and develop a new defined term for SOL Exceedance”.</p>
<b>SDT response:</b>					
<p>[1] The drafting team agrees with this alignment revision, and the suggested errata change was incorporated into the Glossary definition.</p> <p>[2] As noted in your comment, your proposed revisions are outside the scope of this project. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.</p>					
16	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<b>SDT response:</b> <a href="#">Please see the drafting team response to comments submitted by the Southwest Power Pool.</a>					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a>					
19	John Allen –	4		Yes	See comments from SPP Standards Review Group.

#	Commenter Organization	Segment	Group name	Y/N	Comment
	City Utilities of Springfield, Missouri				
<b>SDT response:</b>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	
<b>SDT response:</b>					
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<b>SDT response:</b>					
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
<b>SDT response:</b>					
26	Linda Jacobson-Quinn –	3		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	City of Farmington				
<b>SDT response:</b>					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		Yes	
<b>SDT response:</b>					
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	[1] Texas RE noticed inconsistency in capitalization (Facility Ratings/Equipment Ratings) in the ROP definition.  [2] In general, Texas RE recommends consistency with capitalization. Capitalization infers a term is defined in the Glossary and/or ROP.
<p><b>SDT response:</b>  <a href="#">[1] Please see the NERC response to ROP comments, which address all comments received for proposed revisions to the ROP definitions.</a>   <a href="#">[2] The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</a></p>					
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
<p><b>SDT response:</b></p>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<p><b>SDT response:</b></p>					
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<p><b>SDT response:</b></p>					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	We agree with the proposed capitalization changes. We also wish to stress that future phases need to coordinate with future FAC SDT Projects in order to align any future revisions to this definition.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that future phases should coordinate with ongoing development projects to ensure that Glossary and ROP definitions are developed in alignment.					
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<b>SDT response:</b>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<b>SDT response:</b>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	The drafting team should consider the proposed changes to the definition of “System Operating Limit” in Project 2014-03. This definition may need to be postponed to accommodate for the work being done by the other drafting team.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that future phases should coordinate with ongoing development projects to ensure that Glossary and ROP definitions are developed in alignment.					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
45	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
47	Bernard Johnson – Oglethorpe Power Corporation	5		No	
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	
<b>SDT response:</b>					
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<b>SDT response:</b>					
50	Jennifer Wright - San Diego Gas & Electric	1		No	SDG&E recommends adding "or angle" to the parenthetical in Term 48, System Operating Limits: "(such as MW, MVar, amperes, frequency, volts or angle)."  Synchro phasors provide angle and angle difference. Angle values can also be used as an SOL. In fact, angles may be a better value to monitor (than MW) when

#	Commenter Organization	Segment	Group name	Y/N	Comment
					trying to determine SOLs for transient stability issues. Synchro phasors are proliferating quickly. The addition of the angle as an SOL value will open the door to allow the use of synchro phasors for system monitoring purposes.
<p><b>SDT response:</b> Thank you for your comments; however, the proposed revisions fall outside the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.</p>					
51	Jason Snodgrass - Georgia Transmission Corporation	1		No	GTC agrees that the SOL definition as it stands is ambiguous and can lead to confusion. However, the proposed definition seems to equate reliability limits with SOLs which would make identification of SOLs unnecessary. SOLs should be identified as a necessary means to remain within applicable reliability limits for certain events specified by TPL-001-4. GTC does not recommend for the SOL definition simply be defined as facility ratings, voltage limits, transient stability ratings, or voltage stability ratings as proposed. The SOL definition should be related to corrective action for certain system configurations/conditions (as specified in TPL-001-4) where curtailment of firm service is necessary to avoid exceeding applicable reliability ratings. For example, an event specified by TPL-001-4 results in a generator's output being curtailed to avoid violating an applicable reliability limit, the amount the generator is being curtailed would be classified as an SOL. For this example, the SOL could occur in the operations or planning horizon.
<p><b>SDT response:</b> Thank you for your comments; however, the proposed revisions fall outside the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.</p>					

End of Report

# Consideration of Comments

## Term 49: Transmission Customer

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 49: Transmission Customer

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 49: Transmission Customer (redline)**

Transmission Customer:

1. Any eligible customer (or its designated agent) that can or does execute a ~~transmission-Transmission service-Service~~ agreement or can or does receive ~~transmission-Transmission serviceService~~.
2. Any of the following ~~responsible~~-entities: Generator Owner, Load-Serving Entity, or Purchasing-Selling Entity.

The SDT is recommending the following changes:

- (1) Revise the Glossary definition to capitalize the term “Transmission Service” because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.
- (2) Remove the word “responsible” to align with the ROP definition. The word “responsible” was originally included in the ROP definition, but was recently removed by the Risk-Based Registration project. The Glossary should be updated to reflect these recent changes.

Do you agree with the proposed Glossary definition revisions to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
<b>SDT response:</b>					
4	Mary Claire Yatsko –	1,3,4,5,6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Seminole Electric Cooperative, Inc.				
<b>SDT response:</b>					
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b>SDT response:</b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b>SDT response:</b>					
11	Lee Pedowicz –	10	NPCC--Project 2015-04	Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Northeast Power Coordinating Council				
<b>SDT response:</b>					
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<b>SDT response:</b>					
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<b>SDT response:</b>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>With the approval of the removal of the PSE entity from the NERC Compliance Registry, and the pending consideration of removal of the LSE function, it seems this definition should undergo further review that is perhaps beyond the scope of this Project.</p>
<p><b>SDT response:</b> Thank you for your comment; however, as acknowledged in your comment, revising the definition to remove references to Load-Serving Entity and Purchase-Selling Entity is outside the scope of work for this project. The drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. Other than alignment revisions, the drafting team was not at liberty to revise the definitions. For the term Transmission Customer, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP.</p> <p>The drafting team notes that although the Risk-Based Registration initiative removed Load-Serving Entity and Purchase-Selling Entity from the NERC Compliance Registry, as explained in further detail in the <a href="#">RBR Petition</a> and <a href="#">Compliance Filing</a>, the two terms nevertheless remain in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove these defined terms from the NERC Glossary until the defined terms are in fact no longer used in the Reliability Standards.</p> <p>During phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation to the SC is needed to address the various concerns raised by commenters.</p>					
16	Jared Shakespeare – Peak Reliability	1		Yes	
<p><b>SDT response:</b></p>					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<p><b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.</p>					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a>					
19	John Allen – City Utilities of Springfield, Missouri	4		No	See comments from SPP Standards Review Group.
<b>SDT response:</b>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	
<b>SDT response:</b>					
24	Heather Morgan –	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	EDP Renewables North America LLC				
<b>SDT response:</b>					
25	Shawna Speer – Colorado Springs Utilities	1		No	Reference the group comments - Colorado Springs Utilities.
<b>SDT response:</b>					
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	
<b>SDT response:</b>					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
31	Mike Smith – Manitoba Hydro	1		Yes	
<b>SDT response:</b>					
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b>SDT response:</b>					
34	Yuguang Xiao – Manitoba Hydro	5		No	
<b>SDT response:</b>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	No	The term ‘Purchasing-Selling Entity’ has been retired from the NERC Reliability Functional Model and should be removed from the definition. Future retirement of the term Load-Serving Entity from the NERC Reliability Functional Model and NERC Glossary may require a future change.
<p><b>SDT response:</b> Thank you for your comment; however, revising the definition to remove references to Load-Serving Entity and/or Purchase-Selling Entity is outside the scope of work for this project. The drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. Other than alignment revisions, the drafting team was not at liberty to revise the definitions. For the term Transmission Customer, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP.</p> <p>The drafting team notes that although the Risk-Based Registration initiative removed Load-Serving Entity and Purchase-Selling Entity from the NERC Compliance Registry, as explained in further detail in the <a href="#">RBR Petition</a> and <a href="#">Compliance Filing</a>, the two terms nevertheless remain in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove these defined terms from the NERC Glossary until the defined terms are in fact no longer used in the Reliability Standards.</p> <p>During phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation to the SC is needed to address the various concerns raised by commenters.</p>					
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<p><b>SDT response:</b></p>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<p><b>SDT response:</b></p>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	We recommend removing the Purchasing-Selling Entity from the definition, as this is no longer a registered function (effective March 19, 2015). The proposed revisions to “Transmission Customer” may need to be postponed until there is

#	Commenter Organization	Segment	Group name	Y/N	Comment
					certainty regarding the outcome of the retirement of the LSE. If both the LSE and PSE retire, the second bullet would result in only a GO being a responsible entity.
<p><b>SDT response:</b> Thank you for your comment; however, revising the definition to remove references to Load-Serving Entity and/or Purchase-Selling Entity is outside the scope of work for this project. The drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. Other than alignment revisions, the drafting team was not at liberty to revise the definitions. For the term Transmission Customer, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP.</p> <p>The drafting team notes that although the Risk-Based Registration initiative removed Load-Serving Entity and Purchase-Selling Entity from the NERC Compliance Registry, as explained in further detail in the <a href="#">RBR Petition</a> and <a href="#">Compliance Filing</a>, the two terms nevertheless remain in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove these defined terms from the NERC Glossary until the defined terms are in fact no longer used in the Reliability Standards.</p> <p>During phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation to the SC is needed to address the various concerns raised by commenters.</p>					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
45	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests the drafting team consider whether the inclusion of the Purchasing-Selling Entity should be removed in light of FERC approval regarding Risk Based Registration. The same could be said for the use of the term Load Serving Entity as well, depending on a ruling from FERC.
<p><b>SDT response:</b> Thank you for your comment; however, revising the definition to remove references to Load-Serving Entity and/or Purchase-Selling Entity is outside the scope of work for this project. The drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. Other than alignment revisions, the drafting team was not at liberty to revise the definitions. For the term Transmission Customer, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP.</p> <p>The drafting team notes that although the Risk-Based Registration initiative removed Load-Serving Entity and Purchase-Selling Entity from the NERC Compliance Registry, as explained in further detail in the <a href="#">RBR Petition</a> and <a href="#">Compliance Filing</a>, the two terms nevertheless remain in several Reliability Standards that are active, pending, or subject to future enforcement. While any Reliability Standard requirement that references an entity proposed for deactivation will be moot and not enforceable with respect to that entity (see RBR Petition at 20), it is not appropriate to remove these defined terms from the NERC Glossary until the defined terms are in fact no longer used in the Reliability Standards.</p> <p>During phase 1 of this project, a number of commenters raised concerns regarding possible revisions that are needed for the Glossary and/or Reliability Standards as a result of the Risk-Based Registration Initiative. As part of Phase 2 of this project, the team will consider whether a recommendation to the SC is needed to address the various concerns raised by commenters.</p>					
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<b>SDT response:</b>					

**End of Report**

# Consideration of Comments

## Term 50: Transmission Operator

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 50: Transmission Operator

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

### MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

### PSEG

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

### Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

**Colorado Springs Utilities**

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

**IRC Standards Review Committee**

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 50: Transmission Operator (redline)**

Transmission Operator:

The entity responsible for the reliability of its “local” transmission system, and that operates or directs the operations of the transmission ~~facilities~~Facilities.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “Facilities” because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	While we agree with the proposed change, the definition in the NERC Glossary and the proposed edit, are inconsistent with the definition presented in the Functional Model. We suggest the SDT to either adopt the FM definition, or to revise the definition in the FM to achieve total consistency.
<b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					

#	Commenter Organization	Segment	Group name	Y/N	Comment
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
<b>SDT response:</b>					
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b>SDT response:</b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	No	Dominion recommends that the word ‘transmission’ should also be capitalized as it too is a defined term in the NERC Glossary.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term;					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	No	<p>[1] In addition to Facilities, Transmission should be capitalized.</p> <p>[2] Suggest to clearly define ‘Facilities’ to prevent the confusion from TOP versus GOP. We recognize the effort that is mentioned in Footnotes 3 and 4 on pages 6 and 7, but the revisions should be done under this project.</p>
<p><b>SDT response:</b></p> <p>[1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p> <p>[2] The drafting team recognizes that the definition of “Facilities” could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions to any definitions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will develop a SAR to revise the definition of Facilities to address the issues identified by team members and various commenters. The SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual.</p>					
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<p><b>SDT response:</b></p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
13	Andrew Puztai – American Transmission Company, LLC	1		Yes	
<b>SDT response:</b>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>For form consistency with other entity type definitions contained in the Glossary, we recommend starting the definition with “The entity that reliably operates its “local” Transmission system,...” rather than “The entity responsible for the reliability of its “local” transmission system,...”.</p> <p>We also recommend capitalization of the term “Transmission” within the Transmission Operator (TOP) definition because this term is defined in the Glossary and we believe its usage in the TOP definition narrative is intended to have the meaning of the defined term.</p>
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in form, sentence structure and capitalization throughout the NERC defined terms. For example, during the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will develop recommendations related to the issues identified in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.</p>					
16	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<b>SDT response:</b> <a href="#">Please see the drafting team response to comments submitted by the Southwest Power Pool.</a>					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a>					
19	John Allen –	4		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	City Utilities of Springfield, Missouri				
<b>SDT response:</b>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		No	Suggest to clearly define ‘Facilities’ to prevent the confusion from TOP versus GOP. We recognize the effort that is mentioned in Footnotes 3 and 4 on pages 6 and 7, but the revisions should be done under this project.
<b>SDT response:</b> The drafting team recognizes that the definition of “Facilities” could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions to any definitions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will develop a SAR to revise the definition of Facilities to address the issues identified by team members and various commenters. The SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual.					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model.
<b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					
24	Heather Morgan –	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	EDP Renewables North America LLC				
<b>SDT response:</b>					
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
<b>SDT response:</b>					
26	Linda Jacobson-Quinn – City of Farmington	3		No	<p>The NERC Functional Model defined Transmission Operator as "The functional entity that ensures the Real-time operating reliability of the transmission assets within a Transmission Operator Area."</p> <p>The SDT and NERC should consider the implications of this term as it has caused some confusion in the application of CIP-002-5 which classifies "Control Centers performing the functional obligations of a Transmission Operator" as medium facilities even if they ARE NOT registered as a TOP. However, if a control center simply 'operates' a Transmission Facility (under the direction of another Registered TOP) that should be considered performing the function of a TOP.</p>
<p><b>SDT response:</b> Thank you for your comments; however, the proposed revisions fall outside the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR or Request for Interpretation (RFI) outlining the issues and your proposed recommendations for resolving those issues.</p>					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		No	Inconsistent approach is used for referencing defined terms with different suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility(ies)".  Note that this inconsistency extends to multiple Glossary of Terms definitions that are not currently addressed in this project.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of suffixes throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.					
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
34	Yuguang Xiao – Manitoba Hydro	5		No	
<b>SDT response:</b>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		No	See comments from NPCC--Project 2015-04.
<b>SDT response:</b> Please see response to [#11]					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	Agree with the capitalization change. However please review comment on the definition for Reactive Power. The term “transmission facilities” is used in that definition and Facilities should be capitalized there as well. It seems the proposed changes between this definition and Reactive Power are using different logic to determine whether Facilities should be capitalized. Additionally, the word “system” in this definition may need to be capitalized as well.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in form, sentence structure and capitalization throughout the NERC defined terms. For example, during the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will develop recommendations related to the issues identified in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.					

#	Commenter Organization	Segment	Group name	Y/N	Comment
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		No	[1] In addition to Facilities, Transmission should be capitalized.  [2] Suggest to clearly define ‘Facilities’ to prevent the confusion from TOP versus GOP. We recognize the effort that is mentioned in  Footnotes 3 and 4 on pages 6 and 7, but the revisions should be done under this project.
<p><b>SDT response:</b></p> <p>[1] Thank you for your comments. The drafting team agrees that there should be consistency in form, sentence structure and capitalization throughout the NERC defined terms. For example, during the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will develop recommendations related to the issues identified in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.</p> <p>[2] The drafting team recognizes that the definition of “Facilities” could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions to any definitions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will develop a SAR to revise the definition of Facilities to address the issues identified by team members and various commenters. The SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual.</p>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<p><b>SDT response:</b></p>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	“Transmission” and “System” are defined terms and the drafting team should consider if they should be capitalized.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term;</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
45	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term “Transmission” throughout the definition, as it is currently a defined term.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<b>SDT response:</b>					

**End of Report**

# Consideration of Comments

## Term 51: Transmission Owner

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 51: Transmission Owner

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 51: Transmission Owner (redline)**

Transmission Owner:

The entity that owns and maintains transmission ~~facilities~~Facilities.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “Facilities” because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
<b>SDT response:</b>					
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
<b>SDT response:</b>					
5	John Seelke –	1,2,5,6	PSEG	Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	PSEG				
<b>SDT response:</b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	No	Dominion recommends that the word ‘transmission’ should also be capitalized as it too is a defined term in the NERC Glossary.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	No	Suggest to clearly define ‘Facilities’ to prevent the confusion from TOP versus GOP. We recognize the effort that is mentioned in Footnotes 3 and 4 on pages 6 and 7, but the revisions should be done under this project.
<p><b>SDT response:</b> The drafting team recognizes that the definition of “Facilities” could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions to any definitions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will develop a SAR to revise the definition of Facilities to address the issues identified by team members and various commenters. The SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual.</p>					
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<p><b>SDT response:</b></p>					
13	Andrew Puztai – American Transmission Company, LLC	1		Yes	
<p><b>SDT response:</b></p>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<p><b>SDT response:</b></p>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>We also recommend capitalization of the term “Transmission” within the Transmission Owner (TO) definition because this term is defined in the Glossary and we believe its usage in the TO definition narrative is intended to have the meaning of the defined term.</p>
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
16	Jared Shakespeare – Peak Reliability	1		Yes	Is there ever a difference between the entity that owns it and the entity that maintains it? Perhaps there could be some discrepancy between the two.
<p><b>SDT response:</b> The drafting team believes that the owner has responsibility for both ownership and maintenance, however, in practice, maintenance may be delegated to another entity. To the extent you believe clarification is needed, the drafting team suggests submitting a SAR outlining the issues and your proposed recommendations for resolving those issues.</p>					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<p><b>SDT response:</b> Please see the drafting team response to comments submitted by the Southwest Power Pool.</p>					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we’re stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It’s just not clear how this is helping and what will be the next project tackled by the team.</p>
<p><b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a></p>					
19	John Allen – City Utilities of Springfield, Missouri	4		Yes	See comments from SPP Standards Review Group.
<p><b>SDT response:</b></p>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<p><b>SDT response:</b></p>					
21	Lee Schuster – Duke Energy	3		Yes	
<p><b>SDT response:</b></p>					
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		No	Suggest to clearly define ‘Facilities’ to prevent the confusion from TO versus GO. We recognize the effort that is mentioned in Footnotes 3 and 4 on pages 6 and 7, but the revisions should be done under this project.
<p><b>SDT response:</b> <a href="#">The drafting team recognizes that the definition of “Facilities” could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions to any definitions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will develop a SAR to revise the definition of Facilities to address the issues identified by team members and various commenters. The SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual.</a></p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model.
<p><b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<p><b>SDT response:</b></p>					
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
<p><b>SDT response:</b></p>					
26	Linda Jacobson-Quinn – City of Farmington	3		Yes	
<p><b>SDT response:</b></p>					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<p><b>SDT response:</b></p>					
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b>					
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		No	Inconsistent approach is used for referencing defined terms with different suffixes. For defined term "Facility", sometimes referenced as "Facilities" and other times "Facility(ies)".  Note that this inconsistency extends to multiple Glossary of Terms definitions that are not currently addressed in this project.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of suffixes throughout the NERC defined terms. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will consider developing a recommendation related to the issue raised in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.					
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b>					
34	Yuguang Xiao – Manitoba Hydro	5		No	
<b>SDT response:</b>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		No	See comments from NPCC--Project 2015-04.
<b>SDT response:</b>					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	Agree with the capitalization change. However please review comment on the definition for Reactive Power. The term “transmission facilities” is used in that definition and Facilities should be capitalized there as well. It seems the proposed changes between this definition and Reactive Power are using different logic to determine whether Facilities should be capitalized.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in form, sentence structure and capitalization throughout the NERC defined terms. For example, during the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will develop recommendations related to the issues identified in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.					

#	Commenter Organization	Segment	Group name	Y/N	Comment
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		No	Suggest to clearly define ‘Facilities’ to prevent the confusion from TOP versus GOP. We recognize the effort that is mentioned in Footnotes 3 and 4 on pages 6 and 7, but the revisions should be done under this project.
<p><b>SDT response:</b> The drafting team recognizes that the definition of “Facilities” could be improved. Because the SAR limits this drafting team to alignment of the existing language in the Glossary and ROP definitions, the drafting team did not propose substantive language revisions to any definitions (other than alignment revisions). However, as part of Phase 2 for this project, the drafting team will develop a SAR to revise the definition of Facilities to address the issues identified by team members and various commenters. The SAR will be submitted to the Standards Committee (SC) in accordance with the procedure outlined in the Standards Process Manual.</p>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<p><b>SDT response:</b></p>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	“Transmission” is a defined term and the drafting team should consider if it should be capitalized.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<p><b>SDT response:</b></p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
45	Jared Shakespeare – Peak Reliability	1		Yes	Is there ever a difference between the entity that owns it and the entity that maintains it? Perhaps there could be some discrepancy between the two.
<b>SDT response:</b> The drafting team believes that the owner has responsibility for both ownership and maintenance, however, in practice, maintenance may be delegated to another entity. To the extent you believe clarification is needed, the drafting team suggests submitting a SAR outlining the issues and your proposed recommendations for resolving those issues.					
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term “Transmission” throughout the definition, as it is currently a defined term.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<p><b><u>SDT response:</u></b></p>					

**End of Report**

# Consideration of Comments

## Term 52: Transmission Planner

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballot:** Term 52: Transmission Planner

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 52: Transmission Planner (redline)**

Transmission Planner:

The entity that develops a long-term (generally one year and beyond) plan for the reliability (adequacy) of the interconnected bulk electric transmission systems within its portion of the Planning Authority ~~Area~~area.

**The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to remove the capitalization from the term “Area” because it is not a defined term in Glossary or the ROP.**

**Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.**

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b><u>SDT response:</u></b>					
2	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b><u>SDT response:</u></b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
<b><u>SDT response:</u></b>					
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
<b><u>SDT response:</u></b>					
5	John Seelke –	1,2,5,6	PSEG	Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	PSEG				
<b>SDT response:</b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b>SDT response:</b>					
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	No	Transmission Systems should be capitalized. Both are defined terms in the NERC Glossary. Transmission System should be uniquely defined. The definitions of Transmission and System should not have to be merged by a reader to create the Transmission System definition.
<b>SDT response:</b> Thank you for your comments; however, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Transmission Planner, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. The drafting team agrees that the consecutive use of two (or more) defined terms may create confusion. During Phase 2 of this project, the drafting team will consider					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>recommendations related to sentence structure. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations. To the extent you believe a new defined term should be created, the team suggests that you submit a SAR.</p>					
12	Joe O'Brien – NiSource - Northern Indiana Public Service Co.	6		Yes	
<p><b>SDT response:</b></p>					
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<p><b>SDT response:</b></p>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<p><b>SDT response:</b></p>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>We also recommend capitalization of the terms “Adequacy” and “Transmission” within the Transmission Planner (TP) definition because these terms are defined in the Glossary and we believe their usage in the TP definition narrative is intended to have the meaning of the defined terms.</p>
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
16	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	No	We support the Comments Submitted by the Southwest Power Pool.
<b>SDT response:</b> <a href="#">Please see the drafting team response to comments submitted by the Southwest Power Pool.</a>					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b> Please see the drafting team response to your comment for Term 4: Blackstart Resource.					
19	John Allen – City Utilities of Springfield, Missouri	4		No	See comments from SPP Standards Review Group.
<b>SDT response:</b>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	No	The SRC has previously commented that there needs to be total consistency between all fundamental documents within NERC. Thus, while it does not disagree with the proposed changes, it recommends that the SDT take this opportunity to also synchronize this definition with the Functional Model. The SRC notes that the Functional Model references a Transmission Planner area.
<b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.					

#	Commenter Organization	Segment	Group name	Y/N	Comment
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<b>SDT response:</b>					
25	Shawna Speer – Colorado Springs Utilities	1		No	Reference the group comments - Colorado Springs Utilities
<b>SDT response:</b>					
26	Linda Jacobson-Quinn – City of Farmington	3		No	The same confusion and gap as with a Planning Coordinator exists. FEUS recommends a broader discussion on the two functional entities and their roles as the Reliability Standards do not clearly delineate their responsibilities nor do the definitions.
<b>SDT response:</b> Thank you for your comments; however, your proposed revisions are outside of the permissible scope of work for this project. For the term Transmission Planner, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. The drafting team did not have authorization to revise the definitions outside of addressing alignment between the existing definition language in the Glossary and ROP. If you believe revisions should be made to the definition of Transmission Planner (or Planning Coordinator), the drafting team suggests submitting a Standards Authorization Request (SAR) outlining any perceived issues or proposed revisions to the definition.					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		Yes	
<b>SDT response:</b>					
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b>SDT response:</b>					
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
<b>SDT response:</b>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	No	<p>The use of the term ‘Planning Authority’ should be discontinued and replaced with Planning Coordinator to be consistent with the Functional Model. Planning Authority no longer exists as an entity in the Functional Model. See comment on the definition for Planning Authority above. Also, in a future Phase, a SAR and new definition should be created to define Planning Coordinator Area so there is consistency with the terms Balancing Authority Area, Transmission Operator Area, and Reliability Coordinator Area. See previous comments on Planning Authority definition. Planning Coordinator Area is a term used within FAC-013-2 and FAC-014-2 for example but has no definition.</p> <p>We also comment that in Phase 2, the phrase in the current definition “the interconnected bulk electric transmission systems” should be changed to “its portion of the interconnected Bulk-Electric System”.</p> <p>Finally, we comment for Phase 2 that the definition could be improved such that the phrase “reliability (adequacy)” is removed and replaced with the defined term “Reliable Operation”. This would make it more consistent with other terms in the Glossary and ROP.</p>
<p><b>SDT response:</b> Unfortunately, your proposed revisions are outside of the permissible scope of work for this project. However, the drafting team appreciates and understands the issues raised in your comments. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. For the term Transmission Planner, the drafting team proposed revising the Glossary definition to align with the existing definition in the ROP. If you believe revisions should be made to improve the definition of Transmission Planner, Planning Authority, or Planning Coordinator, the drafting team suggests submitting a Standards Authorization Request (SAR) outlining any perceived issues or proposed revisions to the definition or Reliability Standards.</p>					
39	Manon Paquet –	1, 5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	On Behalf of: Roger Dufresne, Hydro-Quebec Production				
<b>SDT response:</b>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<b>SDT response:</b>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	The phrase “interconnected bulk electric transmission systems” should be replaced with either “Bulk Electric System” or “Interconnection.”
<b>SDT response:</b> Thank you for your comments; however, the proposed revisions fall outside the permissible scope of work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
43	Kathleen Black – DTE Energy	3,4,5		Yes	
<b>SDT response:</b>					
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
45	Jared Shakespeare –	1		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	Peak Reliability				
<b>SDT response:</b>					
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	Duke Energy suggests capitalizing the term “Transmission” throughout the definition, as it is currently a defined term.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<b>SDT response:</b>					

**End of Report**

# Consideration of Comments

## Term 54: Transmission Service Provider

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballots:** Term 54: Transmission Service Provider

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

### MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

### PSEG

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

### Dominion

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

#### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

#### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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**Exelon Utilities**

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**SPP Standards Review Group**

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

**ACES Standards Collaborators - Terms Project**

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**Term 54: Transmission Service Provider (redline)**

Transmission Service Provider:

The entity that administers the transmission tariff and provides Transmission Service to Transmission Customers under applicable ~~transmission-Transmission service-Service~~ agreements.

The SDT is recommending changes to the Glossary definition to align with the ROP. Specifically, the SDT is proposing to capitalize the term “Transmission Service” because it is a defined term in the Glossary and its usage in this definition narrative is intended to have the meaning of the defined term.

Do you agree with the proposed Glossary definition revision to align the Glossary and ROP? If not, please explain the basis for your disagreement, and your proposal to align the definitions.

#	Commenter Organization	Segment	Group name	Y/N	Comment
1	John Fontenot – Bryan Texas Utilities	1		Yes	
<b>SDT response:</b>					
2	Emily Rousseau – MRO	1,2,3,4,5,6	MRO-NERC Standards Review Forum (NSRF)	Yes	
<b>SDT response:</b>					
3	Leonard Kula – Independent Electricity System Operator	2		Yes	
<b>SDT response:</b>					
4	Mary Claire Yatsko – Seminole Electric Cooperative, Inc.	1,3,4,5,6		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
5	John Seelke – PSEG	1,2,5,6	PSEG	Yes	
<b>SDT response:</b>					
6	Amy Casuscelli – Xcel Energy, Inc.	1,3,5,6		Yes	
<b>SDT response:</b>					
7	Thomas Foltz – AEP	5		Yes	
<b>SDT response:</b>					
8	Dennis Minton – Florida Keys Electric Cooperative Assoc.	1		Yes	
<b>SDT response:</b>					
9	Rob Collins – On Behalf of: Scotty Brown, Southern Indiana Gas and Electric Co.	1, 6, 5, 3		Yes	
<b>SDT response:</b>					
10	Louis Slade – Dominion Resources, Inc.	6	Dominion Resources, Inc.	Yes	
<b>SDT response:</b>					
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04	Yes	
<b>SDT response:</b>					
12	Joe O'Brien –	6		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	NiSource - Northern Indiana Public Service Co.				
<b>SDT response:</b>					
13	Andrew Pusztai – American Transmission Company, LLC	1		Yes	
<b>SDT response:</b>					
14	Matthew Beilfuss – WEC Energy Group, Inc.	3,4,5,6		Yes	
<b>SDT response:</b>					
15	Dennis Chastain – Tennessee Valley Authority	1,3,5,6		Yes	<p>For alignment purposes, we agree with the proposed change to the Glossary definition.</p> <p>We also recommend capitalization of the term “Transmission” within the Transmission Service Provider (TSP) definition because this term is defined in the Glossary and we believe its usage in the TSP definition narrative is intended to have the meaning of the defined term.</p>
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
16	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
17	Kaleb Brimhall – Colorado Springs Utilities	5	Colorado Springs Utilities	Yes	We support the Comments Submitted by the Southwest Power Pool.
<b>SDT response:</b> <a href="#">Please see the drafting team response to comments submitted by the Southwest Power Pool.</a>					
18	Terry Bilke – Midcontinent ISO, Inc.	2		No	<p>Thanks for the opportunity to comment. While we appreciate the efforts of the team and are generally don't have concerns with the definitions presented, this appears to be just the start of a much wider effort that will provide little benefit and additional churn of the standards just when we are trying to stabilize them.</p> <p>From a standards process perspective, we had concerns with the SAR and the meeting notes from the team. The "Detailed Description" section of the SAR says it is a non-exhaustive, illustrative listing of the types of work that will be undertaken. Thus the SAR is totally unbounded. The drafting team meeting notes imply a next step is to go through the standards and in cases where there is a lower case word or phrase used that happens to be spelled the same as a defined term, to make these capitalized terms. There typically is a very conscious decision by a drafting team whether to leave a word or term lower case. Changing the term to a defined one changes the standard.</p> <p>A simple solution that doesn't change the intent of standards or the Rules is to create a NERC master glossary that puts a parenthetical after the term on whether it is a Standards or RoP (or any other source document) term. Even if NERC were to align terms in every single document, you will have different definitions between NERC, FERC, IEEE, NAESB, and other overlapping organizations for the same word or term.</p> <p>While we say we're stabilizing the standards, this adds another layer of effort, particularly when you look at how this is broken up into dozens of ballots. It's just not clear how this is helping and what will be the next project tackled by the team.</p>
<b>SDT response:</b> <a href="#">Please see the drafting team response to your comment for Term 4: Blackstart Resource.</a>					
19	John Allen –	4		Yes	See comments from SPP Standards Review Group.

#	Commenter Organization	Segment	Group name	Y/N	Comment
	City Utilities of Springfield, Missouri				
<b>SDT response:</b>					
20	Jeremy Voll – Basin Electric Power Cooperative	3		Yes	
<b>SDT response:</b>					
21	Lee Schuster – Duke Energy	3		Yes	
<b>SDT response:</b>					
22	Si Truc Phan – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee	Yes	
<b>SDT response:</b>					
24	Heather Morgan – EDP Renewables North America LLC	5		Yes	
<b>SDT response:</b>					
25	Shawna Speer – Colorado Springs Utilities	1		Yes	
<b>SDT response:</b>					
26	Linda Jacobson-Quinn –	3		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	City of Farmington				
<b>SDT response:</b>					
27	Dan Wilson – PPL Electric Utilities Corporation	5		Yes	
<b>SDT response:</b>					
28	Yvonne McMackin – Public Utility District No. 2 of Grant County, Washington	4		Yes	
<b>SDT response:</b>					
29	Michiko Sell – Public Utility District No. 2 of Grant County, Washington	1		Yes	
<b>SDT response:</b>					
30	Alex Ybarra – Public Utility District No. 2 of Grant County, Washington	5		Yes	
<b>SDT response:</b>					
31	Mike Smith – Manitoba Hydro	1		Yes	
<b>SDT response:</b>					
32	Andrew Gallo – Austin Energy	6		Yes	
<b>SDT response:</b>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
33	Rachel Coyne – Texas Reliability Entity, Inc.	10		Yes	
<b>SDT response:</b>					
34	Yuguang Xiao – Manitoba Hydro	5		Yes	
<b>SDT response:</b>					
35	Chris Scanlon – Exelon	1	Exelon Utilities	Yes	
<b>SDT response:</b>					
36	Martin Boisvert – Hydro-Quebec TransEnergie	1		Yes	
<b>SDT response:</b>					
37	Erika Doot – U.S. Bureau of Reclamation	5		Yes	
<b>SDT response:</b>					
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group	Yes	For Phase 2, we suggest reviewing the term ‘Agreement’ as it is a defined term and its usage appears to also be intended to have the meaning of the defined term.
<b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the					

#	Commenter Organization	Segment	Group name	Y/N	Comment
<p>decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5		Yes	
<p><b>SDT response:</b></p>					
40	Robert A. Schaffeld – Southern Company - Southern Company Services, Inc.	1		Yes	
<p><b>SDT response:</b></p>					
41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project	No	“Transmission” and “Agreement” are defined terms and the drafting team should consider if they should be capitalized.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
42	Andy Bolivar – NextEra Energy - Florida Power and Light Co.	1		Yes	
<p><b>SDT response:</b></p>					
43	Kathleen Black –	3,4,5		Yes	

#	Commenter Organization	Segment	Group name	Y/N	Comment
	DTE Energy				
<b>SDT response:</b>					
44	Jennifer Losacco – NextEra Energy - Florida Power and Light Co.	1		Yes	
<b>SDT response:</b>					
45	Jared Shakespeare – Peak Reliability	1		Yes	
<b>SDT response:</b>					
46	Tony Eddleman – Nebraska Public Power District	3		Yes	
<b>SDT response:</b>					
47	Bernard Johnson – Oglethorpe Power Corporation	5		Yes	
<b>SDT response:</b>					
48	Colby Bellville – Duke Energy	1,3,5,6	Duke Energy	Yes	
<b>SDT response:</b>					
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6		Yes	
<b>SDT response:</b>					

**End of Report**

## Consideration of Comments

**Project Name:** 2015-04 Alignment of Terms

**Comment Period Start Date:** 6/13/2015

**Comment Period End Date:** 7/27/2015

**Associated Ballots:** N/A

**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**MRO-NERC Standards Review Forum (NSRF)**

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**PSEG**

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Karla Jara	PSEG Energy Resources & Trade LLC	RFC	6

**Dominion**

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	N/A	1,3,5,6
Randi Heise	NERC Compliance Policy	N/A	1,3,5,6

Connie Lowe	NERC Compliance Policy	N/A	1,3,5,6
Louis Slade	NERC Compliance Policy	N/A	1,3,5,6
Chip Humphrey	Power Generation Compliance	N/A	5
Nancy Ashberry	Power Generation Compliance	RFC	5
Dan Goyne	Power Generation Compliance	N/A	5
Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Whanger	Power Generation Compliance	SERC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3
Angela Park	Electric Transmission Compliance	SERC	1,3
Candace L Marshall	Electric Transmission Compliance	SERC	1,3
Larry W Bateman	Electric Transmission Compliance	SERC	1,3
John Calder	Electric Transmission Compliance	SERC	1,3
Jeffrey N Bailey	Nuclear Compliance	SERC	5
Tom Huber	Nuclear Compliance	NPCC	5

**NPCC--Project 2015-04**

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

### Colorado Springs Utilities

Group Member Name	Entity	Region	Segments
Shawna Speer	Colorado Springs Utilities	WECC	1
Charlie Morgan	Colorado Springs Utilities	WECC	3
Shannon Fair	Colorado Springs Utilities	WECC	6
Kaleb Brimhall	Colorado Springs Utilities	WECC	5

### IRC Standards Review Committee

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Terry Bilke	MISO	RFC	2

Ali Miremadi	CAISO	WECC	2
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#### Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

#### SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Mike Buyce	City Utilities of Springfield Missouri	SPP	1,4
Kevin Giles	Westar Energy	SPP	1,3,5,6
Robert Hirschak	Cleco Power	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Cooperative	SPP	1
Jason Smith	Southwest Power Pool	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Don Schmit	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
John Allen	City Utilities of Springfield Missouri	SPP	1,4
Louis Guidry	Cleco Power	SPP	1,3,5,6

#### ACES Standards Collaborators - Terms Project

Group Member Name	Entity	Region	Segments
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Scott Brame	North Carolina Electric Membership Corporation	SERC	3,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Laurel Heacock	Oglethorpe Power Corporation	SERC	5,6

Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
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**Duke Energy**

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Question**

**If you have additional comments on the proposed revisions to the Glossary definitions that you have not provided in your responses above, please provide them here.**

#	Committer Organization	Segment	Group name	Y/N	Comment
3	Leonard Kula – Independent Electricity System Operator	2			<p>We commented on the SAR to highlight the importance of achieving total consistency across the terms defined in Reliability Standards, RoP and Functional Model, and suggested that the purpose statement, scope of work, goals and detail description of work of this project be expanded to include reviewing terms defined in the Functional Model. We noticed that the proposed changes to the NERC Glossary (and the ROP) do not appear to be fully aligned with the terms defined in the FM. We suggest the drafting team to follow-up on its proposed approach outlined in the response to our comment, that: “... The drafting team work for Project 2015-04 will focus on aligning the cross-over terms in the Glossary and ROP. The Functional Model Advisory Group will be provided with the results of the drafting team work, so that appropriate changes can be made to the Functional Model.”</p> <p>We once again propose the SDT to make the appropriate changes to the terms defined in the three documents as necessary and appropriate to achieve total consistency. We do not believe changes to the FM are outside of the scope of the project, but where in the SDT’s opinion this is the case, we suggest that the SDT amend the SAR to include the terms defined in the FM.</p>
<p><b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
11	Lee Pedowicz – Northeast Power Coordinating Council	10	NPCC--Project 2015-04		[1] Is there a NERC endorsed consistent format for capitalization when you have a term that is made up of several words, and is not defined in the NERC Glossary, but some of the words are defined? For example, in PRC-002-2 Disturbance Monitoring and Reporting Requirements, the Standard uses the term dynamic

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>Disturbance recording. Only Disturbance is capitalized because it is the only word in the NERC Glossary.</p> <p>[2] This Comment Form is asking for input on the alignment of the terms in the NERC Glossary and the RoP. To ensure a comprehensive comparison and review, why aren't all the terms listed in the Proposed Revisions to Appendix 2 of the Rules of Procedure - Project 2015-04 Alignment of Terms included in this Comment Form?</p> <p>[3] The term 'Reliable Operation' must be also capitalized in the definition of 'Frequency Response Obligation'; 'Interconnected Operations Service' or archive terms such as 'Frequency Bias Setting' 2005; 'Overlap Regulation Service'.</p>

**SDT response:**

[1] Thank you for your comments. The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the *existing* definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

[2] Because there are separate and distinct processes for revising definitions in the Glossary and the ROP, the commenting for the Glossary and ROP was conducted separately. The Glossary definition revision process is governed by the Standards Process Manual (see, Section 5). The definition development process, for the most part, mirrors the process for standards development. The ROP revision process is governed by Section 1400 of the ROP, and the ROP revisions are being proposed by the Standards Committee pursuant to those provisions. However, both 45-day comment periods ran simultaneously because the proposed revisions to the Glossary and ROP are inextricably linked.

[3] As outlined above, the drafting team agrees that there should be consistency in capitalization throughout the NERC defined terms. The drafting team will provide a recommendation regarding capitalization consistency during Phase 2 of this project.

#	Commenter Organization	Segment	Group name	Y/N	Comment
22	Si Truc Phan – Hydro-Quebec TransEnergie	1			On phase II of this project, Suggest to change the term ‘Interchange Authority’ to ‘Interchange Coordinator’ to harmonize with Planning Coordinator, Reliability Coordinator, etc.
<p><b>SDT response:</b> Thank you for your comments; however, the drafting team did not identify “Interchange Authority” or “Interchange Coordinator” as terms for which it will develop a SAR. To the extent that you believe the issues identified in your comments should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues.</p>					
23	Christina Bigelow – Electric Reliability Council of Texas, Inc.	2	IRC Standards Review Committee		<p>[1] The SRC respectfully suggests that this project and the proposed additional phases have the potential to result in additional revisions to Reliability Standards through official efforts as well as unintentional consequences to the meaning and/or intent of Reliability Standards. While achieving consistency is an important effort, the maintenance of multiple definitions and the modification of definitions outside of specific, focused drafting processes for particular standards could exacerbate the potential for adverse and unintended consequences. Hence, the SRC would recommend that the SDT re-consider its proposal for additional phases and provide any proposed or recommended revisions for definitions to the SDTs or periodic review teams associated with affected Reliability Standards where impacts are standard-specific.</p> <p>[2] The SRC respectfully suggests that the SDT utilize this effort to define the Glossary of terms Used in Reliability Standards as the primary repository of defined terms for all NERC documents. There are opportunities in other documents to cross-reference the Glossary and such opportunities should be seized to facilitate and maintain consistency on an ongoing basis. As an example, the last paragraph of the General Section of Appendix 2 of the Rules of Procedure provides statements referencing terms having their “commonly understood” and “technical meanings.” As the Rules of Procedure already provides for cross-referencing to “define” terms, the SRC respectfully suggests that, to reduce the potential for inconsistent terms on the future, NERC utilize a cross-reference to the NERC Glossary of Terms Used In Reliability Standards and only define those terms that are specific to the Rules of Procedure or are defined differently as a result of their usage in Rules of Procedure. This would simplify the Rules Of Procedure, reduce ongoing confusion regarding the differing “glossaries” and facilitate ongoing consistency. To effect this recommendation, the SRC suggests</p>

#	Commenter Organization	Segment	Group name	Y/N	Comment
					<p>that the paragraph in the General Section beginning “Definitions of terms in this Appendix...” be deleted and the following paragraph modified by adding the following sentence at its beginning:</p> <p>“Defined Terms utilized in these Rules of Procedure shall have the definition provided in the NERC Glossary of Terms Used In Reliability Standards unless otherwise defined below. Other terms used on the Rules of Procedure....”</p> <p>[3] To reiterate its comments above, the SRC commented on the SAR to highlight the importance of achieving total consistency across the terms defined in Reliability Standards, Rules of Procedure, and Functional Model, and suggested that the purpose statement, scope of work, goals and detail description of work of this project be expanded to include reviewing terms defined in the Functional Model. As noted, the proposed changes to the NERC Glossary (and the Rules Of Procedure) do not appear to be fully aligned with the terms defined in the Functional Model. The SRC suggests that the drafting team reconsider its proposed approach outlined in the response to our comment, that: “... The drafting team work for Project 2015-04 will focus on aligning the cross-over terms in the Glossary and Rules Of Procedure. The Functional Model Advisory Group will be provided with the results of the drafting team work, so that appropriate changes can be made to the Functional Model.”</p> <p>As noted in the White Paper regarding the Proposed Revisions to Align Definitions in the Glossary of Terms and Rules of Procedure, discrete revision processes were a cause of several terms becoming incongruent. To avoid a similar result with the process to revise the Functional Model, it is recommended that the SAR be revised to allow all definitions changes not associated with specific reliability standards to be consolidated into one effort. Thus, the SRC recommends that the SDT make the appropriate changes to the terms defined in the three documents as necessary and appropriate to achieve total consistency.</p> <p>[4] Finally, the SDT should ensure that the definitions are consistent when it comes to the use of the terms “Bulk Power System” and “Bulk Electric</p>

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					System.” If this cannot be done in Phase 1 of the project, then it should be evaluated in the proposed future phases.

**SDT response:**

[1] Thank you for your comments. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations.

[2] The drafting team agrees that in some respects it would be easier to have one document containing all of the NERC defined terms. However, due to the differences in how the two sources are revised and the differences in how the terms are used, the team is not recommending that the two sources are combined. The drafting team notes that the defined terms included in the Glossary and ROP are applicable only with regard to the source in which they are defined (Glossary terms only apply to Reliability Standards, whereas ROP terms only apply to provisions of the ROP). Given that the Reliability Standards and the ROP address very different subject matters and serve different purposes, the definitions are developed and maintained separately. Additionally, the process for revising Glossary terms is substantially different than for revising ROP terms. Glossary terms must be developed (and revised) in the same manner as Reliability Standards - by a drafting team and subject to industry ballot and approval (See Section 5 of the Standards Process Manual). On the other hand, revisions to the Rules of Procedure (including the defined terms found in Appendix 2) are undertaken through Section 1400 of the Rules of Procedure. As indicated above, during Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The team will consider the issues raised in your comments during the Phase 2 development stage.

[3] The drafting team understands your concern; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the *existing* language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.

[4] The drafting team agrees that in the Reliability Standards, Glossary, and ROP there are instances of inconsistent or incorrect usage or application of the terms Bulk Electric System (BES) and Bulk Power System (BPS). Because the SAR limits this drafting team to alignment of the definitions in the Glossary and ROP, the team did not address this issue. However, during Phase 2 of this project, the drafting team will consider a recommendation that an effort is undertaken to assess usage of the BES and BPS throughout the Reliability Standards, Glossary, and ROP for the purpose of ensuring proper usage and application of the various terms given the particular context. The drafting team *highly* encourages you to attend the next Project 2015-04 meeting which will focus on development of the SAR and Phase 2 recommendations.

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26	Linda Jacobson-Quinn – City of Farmington	3			The NERC Glossary and Terms and NERC Rules of Procedure fail to align (and in some instances contradict) the NERC Functional Model. In order provide consistency and clarity to the industry, the NERC Functional Model should be reviewed and revised.
<p><b>SDT response:</b> Thank you for your comments; however, modifications to the Functional Model fall outside the permissible scope of the work for this project. As outlined in the SAR, the drafting team revisions were limited to alignment of the <i>existing</i> language of the Glossary and ROP cross-over terms. As part of Phase 2 of this project, the drafting team will make a recommendation to the Standards Committee that the Functional Model Advisory Group (FMAG) update the Functional Model to incorporate the industry-approved alignment revisions. Note that the purpose of the FMAG is to maintain the NERC Reliability Functional Model and the associated Technical Documents at the direction of the Standards Committee (SC) to ensure the model correctly reflects the industry today and evaluates and incorporates new and emergent reliability related tasks. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
31	Mike Smith – Manitoba Hydro	1			Numerous Glossary of Terms definitions not identified in this project require modification to align with whichever approach is consistently applied for referencing defined terms with suffixes that modify how the defined term appears (ex. "Facility" being referenced as "Facilities" or "Facility(ies)"). Once a unified approach is determined, it should be applied to all instances when referencing this defined term, in addition to other defined terms where the suffix modifies how the term appears in the Glossary.
<p><b>SDT response:</b> Thank you for your comments. The drafting team agrees that there should be consistency in form, sentence structure and capitalization throughout the NERC defined terms. For example, during the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. As part of Phase 2 of this project, the drafting team will develop recommendations to prevent future misalignment or inconsistencies in NERC defined terms. The drafting team will develop recommendations related to the issues identified in your comments. The drafting team will provide its Phase 2 recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the recommendations. The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.</p>					
37	Erika Doot – U.S. Bureau of Reclamation	5			Reclamation would like to thank the drafting team for their efforts
<p><b>SDT response:</b></p>					

#	Commenter Organization	Segment	Group name	Y/N	Comment
38	Jason Smith – Southwest Power Pool, Inc. (RTO)	2	SPP Standards Review Group		<p>[1] We truly commend the drafting team on their efforts associated with this project. However, this review group would like the drafting team to provide more clarity on what Legal Documentation serves as the foundation (carries the most weight) or driving force to the project. We see that the Federal Power Act was mentioned several times in association with the Glossary of Terms and Rules of Procedure (RoP). We feel this clarification will definitely help give the industry a better understanding of how the drafting team developed their recommendations for phase I and phase II of this project.</p> <p>[2] Additionally, we suggest to the drafting team to evaluate the term ‘Interpersonal Communication’ in COM-001-2. The review group feels that there is an uncertainty on the intent of the phrase ‘any medium’ within the definition. We would like to see more clarity provided on what this phrase is applicable to. Would this phrase be applicable only to real-time communication? Is it just for audible methods or does visual fit the equation? For example in Requirement R9, there is confusion on what is intended by the phrase ‘initiate action to repair or designate a replacement’. Additionally in Requirement R10, our concern would be what would be designated as a ‘medium’ in this process (when does the time start). We’re not sure if this term qualifies for either phase of your project but, we figured that it wouldn’t hurt to mention our concern in reference to this particular term.</p>
<p><b>SDT response:</b></p> <p>[1] The primary governing authorities are the statutes and implementing regulations of the applicable governmental authorities in each jurisdiction of the ERO, pursuant to which the NERC ROP and Reliability Standards are approved and made effective.</p> <p>[2] Thank you for your comments; however, the proposed actions are outside of the scope of work for this project. To the extent that you believe the issues with the term “Interpersonal Communication” should be addressed by a development project, the drafting team encourages you to submit a SAR outlining the issues and your proposed recommendations for resolving those issues. Also, the drafting team notes that Project 2015-07 Internal Communications Capabilities is currently an active standards development project. The team suggests attending the Project 2015-07 meeting and voicing your concerns to that team.</p>					
39	Manon Paquet – On Behalf of: Roger Dufresne, Hydro-Quebec Production	1, 5			In project 2015-04 many interrogations have been raised. We know that they will be treated in phase 2 but we want to address them in this section in order to let you know our concerns.

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					<p>[1] The term "unit" is not define in neither glossary of terms nor rules of procedures.</p> <p>[2] In the glossary of terms, page 94, in the NPCC section, the "generating plant" definition could be in conflict with other definitions.</p>

**SDT response:**

[1] Thank you for your comments; however, the proposed actions are outside of the scope of work for this project. To the extent that you believe a definition should be developed for the term “unit,” the drafting team encourages you to submit a SAR outlining why a definition should be created. The drafting team notes that as part of Phase 2, the team will submit a SAR recommending revisions to the definition of “Facility.” The drafting team highly encourages you to attend the next Project 2015-04 meeting which will focus on development of these Phase 2 recommendations.

[2] Regional definitions were not included as part of the continent-wide project. The regional revision process is conducted separate and apart from the NERC continent-wide development process. To the extent you believe an issue exists with the definition of “generating plant,” the drafting team encourages you to bring it to the attention of your regional entity.

41	Ben Engelby – ACES Power Marketing	6	ACES Standards Collaborators - Terms Project		<p>[1] For each definition that is modified, an evaluation of its use in every requirement should be performed to ensure that the meaning of the requirement is not unintentionally modified. This evaluation should be documented for review by industry during the next posting.</p> <p>[2] We also recommend that the drafting team develop a white paper or technical reference document to clarify when the drafting team intended to have lowercase defined terms. There are compliance implications with lowercase terms and guidance should clarify the intended meanings of these terms. If the drafting team does not decide to choose this course of action, we recommend that the drafting team consider replacing lowercase Glossary/ROP terms with other language to avoid confusion and ambiguity.</p>
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**SDT response:**

[1] As part of Phase 1 for this project, the drafting team identified all existing defined terms that are contained in both the Glossary and the ROP (“cross-over terms”), and to the extent there were definitional differences, assessed whether alignment revisions should be made. For each of the cross-over terms under consideration, the drafting team undertook substantial background research before determining whether alignment revisions were appropriate, including an examination of the history of the term’s definition, previous drafting teams’ intent, relevant NERC filings to FERC, and any FERC orders approving the term’s definition. Additionally, the SDT examined how each term is used in the Glossary, Reliability Standards, and ROP provisions, and how any proposed revisions will

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<p>affect the application of the standards or rules. Based on this thorough examination, the SDT determined whether alignment revisions were appropriate. The <a href="#">“Summary of Proposed Revisions to Align Cross-Over Terms”</a> contains a detailed overview of the drafting team research and assessment for each of the cross-over terms under revision.</p> <p>[2] The drafting team agrees that there should be consistency in the use of capitalization throughout the NERC defined terms. During the Phase 1 work, a number of capitalization issues were identified, including, but not limited to: capitalization of a term that is not a defined term; failure to capitalize a defined term when the term has the definitional meaning; and, capitalization of a term that is a defined term but should not be capitalized because it does not have the intended meaning of the definition. However, the drafting team revisions were limited to alignment of the <i>existing</i> definitions, and therefore the team was not at liberty to address capitalization issues if the existing definitions were aligned (and the capitalization issue was present in both the ROP and Glossary definition). As part of Phase 2 of this project, the team will consider all of the capitalization issues identified during Phase 1 and develop recommendations for how to address these issues. The drafting team will provide its recommendations to the Standards Committee (SC) and NERC. It will be the decision of the SC and NERC regarding how to best proceed with the drafting team recommendations. The drafting team encourages you to attend the next Project 2015-04 meeting which will focus on development of the Phase 2 recommendations.</p>					
49	Andrea Jessup – Bonneville Power Administration	1,3,5,6			BPA supports and appreciates NERC’s efforts to bring greater consistency to the governing reliability standards documents.
<p><b><u>SDT response:</u></b></p>					

**End of Report**