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**Comments applicable to multiple standards:**

Peter Henderson, IMO

Section 1 & 2: Under "Compliance Monitoring Responsibility", the term "Unaffiliated Third Party" needs to be clarified. \*\*This comment also applies to Standards 58 and 61.

**Response:** The Functional Model Technical Discussion included the following description on page 22:

Today, the Regional Councils are the Compliance Monitors in NERC. The Regional compliance plans are audited by the NERC organization.

In those situations where the Compliance Monitor is also the organization performing a reliability service or operating function (such as a Regional Council that is also the Reliability Authority), then the Compliance Monitor for that function should be a third party that is unaffiliated with that organization.

In trying to 'implement' as much of the Functional Model as possible with the translation to V0, the SDT looked at each V0 standard where the Compliance Monitor is also the organization performing the service function – and used the language, 'unaffiliated third party' to indicate that the Compliance Monitor for the associated requirement would not be the Regional Council. Many commenters objected to this, and in all cases, the SDT reverted to the language in the original Planning Standards. The term, 'unaffiliated third party' was removed from V0.

Phil Park, BCTC

Chifong Thomas

Kent McCarthy, Idaho Pwr Co

Rebecca Berdahl, BPA

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

The introduction in the original NERC Standards provided useful back ground information in applying the standard and should be retained. This comment would also apply to most of the other draft standards.

**Response:**

The SDT agrees that there was much valuable information contained within the original Introductions – as you indicated, this is useful background information, but is not part of a requirement. New Reliability Standards do not contain explanatory information. The extra information should be included in a supporting document, not in the standard.

**51.0**

**51.0**

Thomas Mielnik, MAPP PSDWG

All four requirements in Standard 051 should use consistent language. R1-1 says that the assessment is to assure that: the network CAN DELIVER GENERATOR UNIT OUTPUT TO MEET project customer demand.... The commenter has capitalized the words that should be made consistent among the Requirements in 051. While R2-1, R3-1, and R4-1 say that: the network CAN BE OPERATED TO SUPPLY PROJECT CUSTOMER DEMANDS AND PROJECTED FIRM (NON- RECALLABLE RESER VED) TRANSMISSION SERVICES.....

The MAPP PSDWG asks that the requirements be changed to be consistent.

**Response:** While the language in Draft 2 of Version 0 was a direct translation, your proposed change does not change the intent and does improve the consistency, so it was adopted and is reflected in Draft 3 of Version 0.

**51.0**

Thomas Mielnik, MAPP PSDWG

In c. under all four requirements it is not clear if the RRO accepts which item on the bulleted lists is to be followed in the region or the RRO accepts how the testing is done to meet the items in the bulleted list. The MAPP PSDWG recommends that it be the former and therefore delete the words, all of, that appear earlier in c. so that the requirement reads: Be supported by .... testing that addresses the elements in the following list, as accepted by the Regional Reliability Organization.....

**Response:** The SDT researched the changes that were made to this standard during the development of the latest set of compliance templates. The intent was for the RRO to accept the variables selected within each of the 12 categories – not to accept which of the 12 categories are included in the testing. The confusing sentence was modified and subdivided into two sentences to clarify what was intended, and this change was copied into all four of the standards in this series.

**51.0 M1-2**

Thomas Mielnik, MAPP PSDWG

Peter Henderson, IMO

Guy Zito, NPCC-CP9

A. Ralph Rufrano, NY Pwr Auth

Chris de Graffenried, NY Pwr Auth

Peter Lebro, National Grid

Bob Jones, SERC Planning Stds Subcommittee

D. Bryan Guy, Progress Energy, Carolina

Terry Blackwell, SCPSA

Delete the extra: None identified. that is included as part of M1-2.

**Response:** This was corrected and is reflected in Draft 3 of Version 0.

**51.0**

Narinder Saini, Entergy

Table 1: (1) Footnote c) should be removed since the definition of Cascading is in the glossary. (2) Footnote g) does not have a corresponding notation in Table 1.

**Response:** The table was updated to remove footnote 'c'. Footnote 'g' (now footnote 'h') is associated with Category 'C', item 5.

**51.0**

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

Chifong Thomas

Kent McCarthy, Idaho Pwr Co

All of the bulleted item under the 51.x standards should be located in on place.

**Response:** Each standard is designed to be 'stand-alone.'

**51.0**

IKirit Shah, Ameren

(applies to Standards 051.1, 051.2, 051.3, 051.4)

1. It is assumed that the term "critical system conditions" applies to the season of the year and assumed load level (peak, minimum, etc.), and not the state of the transmission system. The latter assumption would be particularly contradictory for Standard 051.1 which is to consider the system with no contingencies.

**Response:** The SDT is translating, not interpreting the source documents.

Kirit Shah, Ameren

2. The requirements of the standards refer to "all demand levels over a range of forecast system demands", yet the detailed bullet mentions that the studies should "be performed for selected demand levels". While we agree that studies are not necessary for all demand levels, more than a single demand level is required for assessment to adequately demonstrate that the load range is covered. This idea needs to be included for clarity.

**Response:** The translation was accurate – additional interpretations are beyond the scope of the SDT.

Kirit Shah, Ameren

3. Having all projected firm transfers modeled may not be practical to achieve in a single snapshot of a powerflow model. The requirement should allow engineering judgment to determine the appropriate level of system utilization to assess reliability considering all projected firm uses. We assume that the phrase "firm transfers" in the Standards refers to both capacity-backed transactions as well as transmission service reservations. Traditionally, capacity-backed transaction values are supported by contracts and are agreed to between entities prior to the development of the powerflow models. Transmission service reservations are more volatile and may be firm on one system, but not on another. Reservations may have been secured for reasons other than to support capacity transactions, they may be held for other specific system needs or as options to meet dynamic market conditions. Because of the nature of the transmission service reservations, it is inappropriate to model all firm transmission service reservations at the same time, as these reservations will not all go to schedule at the same time. For example, some generators have reserved 100% of their plant output in multiple directions to provide for flexibility to deliver to more than one customer or direction, but not more than 100% of the full plant output at the same time. Vertically integrated utilities have reservations going out as well as coming in, to provide for both export opportunities for their generation and to cover import conditions to ensure reliability to their load. Blindly including all transmission reservations in the powerflow models (in, out, and through) would overstate the loading on key facilities in some areas or introduce counterflow, which would understate and mask the loading problems on key facilities in other areas. It is also very difficult to model and glean meaningful results. Therefore, it is suggested that reservations be reviewed for "polarity", as they can increase or decrease the loading on key facilities. Including the word "projected" in the detailed bullet allows some amount of engineering judgment and subjectivity to enter into the modeling assumptions, but this idea needs to be expanded to ensure that they are applied consistently throughout the industry. More than one set

of reservations needs to be reviewed to adequately consider the impact of transmission service reservations.

**Response:** Making specific interpretations about the technical details of individual entities interpretations is beyond the scope of the SDT.

Kirit Shah, Ameren

4. Entities (Transmission Providers) responsible for selling/allocating/approving transmission service need to include in their assessments the issues described in item number 3 above to ensure that the transmission system is not oversubscribed and that there are no reliability concerns associated with existing and future transmission service sales. Granting more firm transmission service assuming counterflow will be there would degrade system reliability.

**Response:** Making specific interpretations about the technical details of individual entities interpretations is beyond the scope of the SDT.

### 51.1

Rebecca Berdahl, BPA

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

Chifong Thomas

Kent McCarthy, Idaho Pwr Co

The statement: Be supported by a current or past study and/or system simulation testing that . . . being assessed is confusing. The following is suggested as a replacement: Be supported by a current or past study that demonstrates compliance with Category A of Table 1 for the plan year being assessed.

**Response:** The original language was more specific and has been retained for draft 3 of Version 0.

### 51.1

Linda Campbell, FRCC

Standard 051.1, R1-2 Instead of stating . . . provide written summary, state develop since R1-3 tells to provide it to the compliance monitor. This same comment applies to 051.2, R2-2 and 051.3, R2-3.

**Response:** The language in draft 2 was an even translation. Making the suggested improvement is a Version 1 issue.

### 51.1

Robert Snow, Independent Contributor

Return to the requirement for multiple time frame studies without exception. If the studies are not conducted, one will never really know if there is a marginal condition.

**Response:** The language in draft 2 was an even translation. Making the suggested improvement is a Version 1 issue. The SDT was charged with translating the latest approved version of the source documents – going back to an earlier version of the source document is outside the SDT's scope.

### 51.1\_R1

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Need to define valid assessment or state that if the listed items are included then the assessment is valid. This also applies to 51.2, R-1; 51.3, R-1; and 51.4, R-1.

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

Al DiCaprio, MAAC

Item c, the 8th bullet references Planned facilities for inclusion of studies. Does the SDT envision inclusion of all 'proposed' Planned facilities or do they envision just the ones under-construction? Or do they envision some other definition of planned facilities?

**Response:** The SDT is translating, not interpreting the source documents.

Peter Henderson, IMO

Guy Zito, NPCC-CP9

A. Ralph Rufrano, NY Pwr Auth

Chris de Graffenried, NY Pwr Auth

Peter Lebro, National Grid

R1-1 Speaks about "planning" the system but does not speak about "designing" the system. We are of the opinion that the drafting team should consider the term are not synonymous and its inclusion in all 4 - 051 standards.

**Response:** Although the "S" statements included the word, 'design' – none of the requirements or measures contained the word, 'design'. Making modifications to the standard to include requirements for the 'design' of the Bulk Electric Systems is a Version 1 issue.

John Loftis, Dominion

Revise the following wording in Requirement R1-1: Current Wording: "The Planning Authority and Transmission Planner shall each demonstrate through a valid assessment that its position . . ."

Proposed Wording: "The Planning Authority and Transmission Planner shall each demonstrate, through valid assessments, that its position . . ." Note: Also applies to 051.2, 051.3, and 051.4 (See comments below)

**Response:** Note that the word 'assessment' was not changed to 'assessments'. An assessment can be a cluster of activities, the sum of which is referred to as, 'the assessment'.

### **51.1\_R1.1**

Roman Carter, Southern

Marc Butts, Southern

It should be made clear that the requirement to deliver generator unit output to meet projected customer demand in R1-1 should be for those generator units with firm deliverability, even to native load customers. Without designation of the capacity and granting of firm service, it should not be a requirement to build transmission for speculative sources of native load generation.

**Response:** Making specific interpretations about the technical details of individual entities interpretations is beyond the scope of the SDT.

### **51.1\_R1.2**

Al DiCaprio, MAAC

Item b is unclear. Suggest SDT rewrite sentence. Would suggest "Review (in subsequent annual assessments) the continuing need for the required facilities."

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Revise the following "provided assessments and corrective plans" to read "performed assessments and developed corrective plans ." M1- 1 refers to the requirements R1-1 and R1-2. These requirements are for performing assessments and developing corrective plans. The providing requirements is R1-3. Therefore, M1-1 should say performed assessments and developed corrective plans, not provided them.

This also applies to 51.2, M-1; and 51.3, M-1.

**Response:** The measure was revised to clarify what was intended.

**51.2**

Thomas Mielnik, MAPP PSDWG

Delete the bullet include the planning (including maintenance) outage of any bulk electric equipment.... This is confusing. Is this asking for an exhaustive study of planned outages plus all Category B? Or is it just supposed to be add any planned outages that are known at the time the study is conducted? Or something else?

**Response:** Removing the bullet would be a change in the translation. Making specific interpretations about the technical details of individual entities interpretations is beyond the scope of the SDT.

**51.2**

Narinder Saini, Entergy

R2-1 c) Add the words (of Table 1) after the words (following Category B).

**Response:** Table I was already mentioned in the main part of this requirement, so it wasn't added.

**51.2**

Narinder Saini, Entergy

R2-2 Make (Authorities) and (Planners) singular to be consistent with other sections of standard.

**Response:** This change was implemented and is reflected in Draft 3 of Version 0.

**51.2 R1\_c**

Jeffrey Miller, WECC Reliability Subcommittee

Rebecca Berdahl, BPA

Phil Park, BCTC

Dr. J. Kondragunta, So CA Edison

Chifong Thomas

Kent McCarthy, Idaho Pwr Co

The statement: "Be supported by a current or past study and/or system simulation testing that . . . being assessed," is confusing.

The following is suggested as a replacement "Be supported by a current or past study that demonstrates compliance with Category B of Table 1 for the plan year being assessed."

**Response:** The requirement was revised to clarify what was intended.

**51.2 R2-1**

Kirit Shah, Ameren

1. From the description in R2-1 and Category B of Table I (column 2), it is specified that the elements to consider for contingencies include generators, transmission circuits, and transformers only. Circuit breakers by themselves are not included in this list of elements. Therefore, the outage of a single terminal or opening of a single circuit breaker of a multi-terminal transmission circuit should be an invalid outage and this standard should clearly state this.

**Response:** The SDT is translating, not interpreting the source documents. The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**51.2 R2-1**

Kirit Shah, Ameren

2. Generation runback and redispatch should not be allowed to meet the performance criteria of this standard (single contingency). If generation runback is allowed, this runback amount should not be considered as "firm".

**Response:** The SDT is translating, not interpreting the source documents. The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**51.2 R2-1**

Kirit Shah, Ameren

3. Regarding R2-1c) bullet 12, maintenance outages are granted in the operating horizon considering the expected demand level, generator dispatch, transmission facilities out of service, and transmission flow patterns, which should be part of a very near-term system assessment and not a longer-term planning assessment. How is this different than the Standard 051.3 assessment which is also supposed to cover all demand levels and multiple contingencies?

**Response:** The SDT is translating, not interpreting the source documents.

**51.2**

Robert Snow, Independent Contributor

Require that all contingencies be studied and then determine which are severe. Most of the August 14 outages by themselves would not have been considered severe.

Return to the requirement for multiple time frame studies without exception. If the studies are not conducted, one will never really know if there is a marginal condition.

Perform and evaluate the performance over a level of system demands with a variety of generation dispatches.

**Response:** The language in draft 2 was an even translation. Making the suggested changes is a Version 1 issue. The SDT was charged with translating the latest approved version of the source documents – going back to an earlier version of the source document is outside the SDT's scope.

**51.2 \_R2**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Change the word "their" to "its" in the first sentence in item a).

**Response:** This change was implemented and is reflected in Draft 3 of Version 0.

**51.2\_R2.1**

John Loftis, Dominion

Same comment as for 51.1 above. Current wording implies that compliance can be demonstrated through a single assessment, where, in reality, it takes numerous assessments to adequately evaluate the performance of the transmission system. Proposed wording addresses this issue.

**Response:** Note that the word 'assessment' was not changed to 'assessments'. An assessment can be a cluster of activities, the sum of which is referred to as, 'the assessment'.

Al DiCaprio

Item 'e' conflicts with the first bullet of Item 'c'. Either delete item or revise to : "All Categories of Contingencies (e.g. lines, transformers...)"

**Response:** The requirement was revised to clarify what was intended.

**51.3**

Thomas Mielnik, MAPP PSDWG

Delete the bullet include the planning (including maintenance) outage of any bulk electric equipment.... This is confusing. Is this asking for an exhaustive study of planned outages plus all Category B? Or is it just supposed to be add any planned outages that are known at the time the study is conducted? Or something else?

**Response:** Removing the bullet would be a change in the translation. Making specific interpretations about the technical details of individual entities interpretations is beyond the scope of the SDT.



**51.3**

Narinder Saini, Entergy

Compliance Monitoring Responsibility: Add the sentence (Each Compliance Monitor shall report compliance and violations to NERC via the NERC Compliance Reporting Process).

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**51.3**

Thomas Mielnik, MAPP PSDWG

Add Each Compliance Monitor shall report compliance and violations to NERC via the NERC Compliance Reporting Process. To the Compliance Monitoring Responsibility section.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**51.3 R3-1**

Thomas Mielnik, MAPP PSDWG

Kirit Shah, Ameren

1. In the last sentence of the paragraph R3-1, the word "maybe" should be replaced with "may be".

**Response:** This change was implemented and is reflected in Draft 3 of Version 0.

**51.3**

Kirit Shah, Ameren

2. see item #3 above for Standard 051.2

**Response:** The SDT is translating, not interpreting the source documents.

**51.3**

Narinder Saini, Entergy

R3-1 c) Add the words (of Table 1) after the words (following Category C).

**Response:** Table I was already mentioned in the main part of this requirement, so it wasn't added.

**051.3**

Kirit Shah, Ameren

3. Is it the intent of the Standard that Category C and D contingencies of Table I should be considered along with facilities out of service for maintenance at lower system demand levels? We believe that the system does not necessarily have to be designed to support multiple outages, at some prescribed off-peak load level, because maintenance outages can be rescheduled to permit the outage at lower off-peak load levels with acceptable system performance. This rescheduling may also allow for additional thermal capability that may be available at off-peak times.

**Response:** The SDT is translating, not interpreting the source documents.

**51.3**

Rebecca Berdahl, BPA

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

Chifong Thomas

Kent McCarthy, Idaho Pwr Co

The statement: "Be supported by a current or past study and/or system simulation testing that . . . being assessed," is confusing. The following is suggested as a replacement "Be supported by a current or past study that demonstrates compliance with Category C of Table 1 for the plan year being assessed."

**Response:** The requirement was revised to clarify what was intended.

**51.3**

Al DiCaprio

Item 'b' is unclear. Revise to: Review (in subsequent annual assessments) the continuing need for required facilities.

**Response:** The proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

Robert Snow, Independent Contributor

If a controlled interruption of customer demand or the planned removal of generators, or the curtailment of firm power transfers is necessary, the locations, amounts and expected duration of the outages will be clearly identified in the report so that the results may be duplicated by a third party. (I do not believe this is an expansion because it has always been considered that the work could be duplicated by another professional.)

**Response:** If additional details are needed, they should be added during the development of Version 1.

Return to the requirement for multiple time frame studies without exception. If the studies are not conducted, one will never really know if there is a marginal condition.

**Response:** The SDT was charged with translating the latest approved version of the source documents – going back to an earlier version of the source document is outside the SDT's scope.

**51.3\_3.1**

John Loftis, Dominion

Same comment as for 51.1 above. Current wording implies that compliance can be demonstrated through a single assessment, where, in reality, it takes numerous assessments to adequately evaluate the performance of the transmission system. Proposed wording addresses this issue.

**Response:** Note that the word 'assessment' was not changed to 'assessments'. An assessment can be a cluster of activities, the sum of which is referred to as, 'the assessment'.

**51.3\_M3.1**

Al DiCaprio

...evidence that ...Compliance Monitor provided ... should be changed to ...evidence Compliance Monitor performed and developed corrective plans

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

**51.4 R4-1**

Kirit Shah, Ameren

Raj Rana

Thomas Mielnik, MAPP PSDWG

1. In the last sentence of the paragraph R4-1, the word "maybe" should be replaced with "may be".

**Response:** This was a typographical error and has been corrected in Draft 3 of Version 0.

Kirit Shah, Ameren

2. see item #3 above for Standard 051.3

**Response:** The SDT is translating, not interpreting the source documents.

**51.4**

Rebecca Berdahl, BPA  
Jeffrey Miller, WECC Reliability Subcommittee  
Dr. J. Kondragunta, So CA Edison  
Chifong Thomas  
Kent McCarthy, Idaho Pwr Co

The statement: “Be supported by a current or past study and/or system simulation testing that . . . being assessed,” is confusing. The following is suggested as a replacement “Be supported by a current or past study that demonstrates compliance with Category D of Table 1 for the plan year being assessed.”

**Response:** The requirement was revised to clarify what was intended.

**51.4**

Deanna Phillips, BPA  
Tracy Edwards, BPA  
Rebecca Berdahl, BPA

In Requirement R4-1, the first paragraph of this new standard says to test a number of each of the extreme contingencies while the old standard says to evaluate only those that would produce the more severe system impacts (the first bullet in item c of this requirement has the correct wording). This language should be corrected to be consistent.

**Response:** There is a footnote ‘d’ of Table I states that a number of extreme contingencies that are listed under Category D . . . will be selected for evaluation.

**51.4**

Robert Snow, Independent Contributor

If a controlled interruption of customer demand or the planned removal of generators, or the curtailment of firm power transfers is necessary, the locations, amounts and expected duration of the outages will be clearly identified in the report so that the results may be duplicated by a third party. (I do not believe this is an expansion because it has always been considered that the work could be duplicated by another professional.)

**Response:** If additional details are needed, they should be added during the development of Version 1.

**51.4\_R1**

Bob Jones, SERC Planning Stds Subcommittee  
Terry Blackwell, SCPSA  
Chifong Thomas

Remove the last sentence "The controlled interruption of customer demand, the planned removal of generators, or the curtailment of firm (non-recallable reserved) power transfers maybe necessary to meet this standard." This sentence is not correct since this measurement has assestment requirement only, and no corrective actions required.

**Response:** This sentence was removed as suggested; this change is reflected in Draft 3 of Version 0.

**51.4**

Peter Mackin, TANC

We suggest removing the statement: The controlled interruption of customer demand, the planned removal of generators, or the curtailment of firm (non-recallable reserved) power transfers maybe necessary to meet this standard R4-1. This statement did not appear in the original compliance template and may be a copy and paste addition error from Requirement R3-1

**Response:** This sentence was removed as suggested; this change is reflected in Draft 3 of Version 0.

**51.4**

John Loftis, Dominion

Same comment as for 51.1 above. Current wording implies that compliance can be demonstrated through a single assessment, where, in reality, it takes numerous assessments to adequately evaluate the performance of the transmission system. Proposed wording addresses this issue.

**Response:** An assessment can be a cluster of activities, the sum of which is referred to as, ‘the assessment’.

**51.4\_M1**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Revise the following "shall provide assessments" to read "shall provide evidence that it performed assessments." M4-1 refers to the requirements R4-1. This requirement is for performing assessments. The providing requirement is R4-2. Therefore, M4-1 should say provide evidence that it performed assessments, not provided them.

**Response:** This measure was revised to clarify what was intended.

**51.4\_M2**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

D. Bryan Guy, Progress Energy, Carolina

In M4-2, change the reference "051.4 R4-1" to "051.4 R4-2."

**Response:** This was a typographical error and has been corrected in Draft 3 of Version 0.

**51.4\_R4.1**

Al DiCaprio

Item 'd' revise to : “All Categories of Contingencies (e.g. lines, transformers...)”.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**51.4\_M**

Al DiCaprio

Reword: "The Planning Authority and Transmission Planner shall provide evidence to its Compliance Monitor that it provided assessments for its system responses per Reliability Standard."

**Response:** The first measure was modified to clarify that the PA and TP have to have a valid assessment as specified in . . . The second measure was not changed.

**52.0**

**52.1**

Linda Campbell, FRCC

The drafting team has changed the Compliance Monitoring Responsibility from NERC to Unaffiliated Third Party. We do not agree with that change and have indicated this is a show stopper in our response to question 11. The compliance monitor for RRO requirements should remain NERC.

This comment applies also to Standards 054.1, 054.2, 054.3, 055.1, 055.2, 056.1,056.2, 057.1, 058.2, 058.4, 058.5, 058.6, 061.1, 067.1, 069.1, 069.2, 069.3, 070.1

**Response:** The Functional Model Technical Discussion included the following description on page 22:

Today, the Regional Councils are the Compliance Monitors in NERC. The Regional compliance plans are audited by the NERC organization.

In those situations where the Compliance Monitor is also the organization performing a reliability service or operating function (such as a Regional Council that is also the Reliability Authority), then the Compliance Monitor for that function should be a third party that is unaffiliated with that organization.

In trying to ‘implement’ as much of the Functional Model as possible with the translation to V0, the SDT looked at each V0 standard where the Compliance Monitor is also the organization performing the service function – and used the language, ‘unaffiliated third party’ to indicate that the Compliance Monitor for the associated requirement would not be the Regional Council. Many commenters objected to this, and in all cases, the SDT reverted to the language in the original Planning Standards. The term, ‘unaffiliated third party’ was removed from V0.

**52.1\_R2**

Bob Jones, SERC Planning Stds Subcommittee  
Marc Butts, Southern  
Terry Blackwell, SCPSA  
Delete the second "shall" in the sentence.

**Response:** This error has been corrected in Draft 3 of Version 0.

**52.1\_M1**

Al DiCaprio, MAAC  
...evidence that ...Compliance Monitor provided ... should be changed to ...evidence Compliance Monitor performed and developed corrective plans

**Response:** This standard does not require a corrective plan.

**52.1**

Narinder Saini, Entergy  
Golbal comment: Beginning in this standard and in many of the standards that follow it, no consistency is found in the use of a capital R in the stand alone word regional. Please decide if Regional will be a defined word and capitalize accordingly.

**Response:** ‘Regional’ should be capitalized whenever used in reference to one of the NERC Regions. When used to describe a more generic geographic area, the word should not be capitalized. Conforming changes have been made to Draft 3 of Version 0 to reflect your suggestion.

**52.1 R1.3**

Al DiCaprio  
4th bullet - drop words "Fuel supply and"; or define the phrase Fuel Adequacy. NERC does not have a measure or definition of Fuel Adequacy. Fuel storage is an economic decision. Little or no storage with continuous supplies is a normal condition. Who will decide if that is 'adequate'?

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**52.1 1.1**

Al DiCaprio  
Delete "...other Regional Reliability Organizations or ..." First, measures should not introduce new requirements. There is no Requirement that permits one RRO to make a mandatory request of another RRO for any study.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**53.0**

**53.0 R1-1**

Peter Henderson, IMO

Guy Zito, NPCC-CP9

A. Ralph Rufrano, NY Pwr Auth

Chris de Graffenried, NY Pwr Auth

Peter Lebro, National Grid

R1-1, Requires Transmission Owners to have and document facility connection requirement for Generation, Transmission and End-user facilities to ensure compliance with NERC, Regional standards, as well as power pool criteria.... The term "power pool" should be eliminated and replaced with appropriate FM terms, such as Transmission Operator.

**Response:** The language in draft 2 was an even translation. The SDT did try to specify functional model entities when determining what functional entity is responsible for the requirement. In this case, it isn't clear which functional entities may be within the Power Pool organization, and since the Power Pool is not assigned the requirement, the SDT did not attempt to replace the term with any functional model entities. Making the suggested change is a Version 1 issue.

**53.0**

Jeffrey Miller, WECC Reliability Subcommittee

Phil Park, BCTC

This standard is not focused on interconnected transmission system reliability. Since this standard is covered by the FERC, NERC should not have this as a standard. Since this standard is not a reliability standard, RS recommends that this standard be dropped.

**Response:** This is a direct translation of the existing standard. FERC does not cover all entities.

**53.0**

Dr. J. Kondragunta, So CA Edison

FERC's Order 2003 established standard interconnection procedures that provide for the reliable interconnection of generation greater than 20 MW. FERC will issue a final order soon providing such for generators below 20 MW. Non-FERC jurisdictional entities have requirements for reliable interconnection as governed by their local regulatory authority. Because sufficient standards already exist for reliable interconnection, Standard 53.0 should not be included in NERC Version 0.

**Response:** This is a direct translation of the existing standard. FERC does not cover all entities.

**53.0**

Ed Riley, CA-ISO

In the Purpose Statement between Generator Owners and Transmission Owners replace the word and with a comma.

**Response:** This was a typographical error and has been corrected in Draft 3 of Version 0.

**53.0\_M12**

Howard Rulf, We Energies

Specifying a specific number of requirements - 16 - will make additional work in revisions if the number of requirements in 053.1-R1-2 changes. Every specific numerical reference like this will need to be found and changed.

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

**53.1**

**53.1**

Thomas Mielnik, MAPP PSDWG

In R1-3 and in the Timeframe for the Compliance Monitoring Process, 5 business days is not long enough. If a key individual is unavailable, the standard may be violated. MAPP PSDWG recommends that the recommends that the 30 calendar days from 53.2 be used throughout the standard.

**Response:** Changing the time periods is a change for Version 1.

**53.1**

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

Chifong Thomas

Kent McCarthy, Idaho Pwr Co

If this standard is kept, R1-1 and R1-2 should be merged

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**53.1 M1.2**

Ed Riley, CA-ISO

Remove the word it after that they.

**Response:** This has been corrected in Draft 3 of Version 0.

**53.1**

Narinder Saini, Entergy

M1-2: The second line of the paragraph contains two pronouns (they it) in that word order in the sentence. Please delete one.

**Response:** This has been corrected in Draft 3 of Version 0.

**53.1 R**

Al DiCaprio

Delete 53.1 Nothing in this standard relates to a NERC-level requirement. This standard is based on RRO setting the requirements but does nothing, from a NERC perspective, of defining whether those RRO requirements are good or bad. This standard punishes RROs for not providing NERC documentation of information that NERC doesn't do anything with nor has a measure for.

**Response:** Agreed. However, this is a direct translation of the existing standard and the SDT was charged with translating these requirements.

**53.1\_M2**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Delete the phrase "for generation facilities, transmission facilities, and end-user facilities" from the measurement. R1-1 requires that facility connection requirements cover generation facilities, transmission facilities, and end-user facilities. R1-2 requires that the facility connection requirements contain the 16 items given. Since M1-2 refers to the requirements in R1-2, there is no need for the words "generation facilities, transmission facilities, and end-user facilities" in M1-2.

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

**53.1 M1.2**

Narinder Saini, Entergy

Omit [they] following [inspection evidence that]

**Response:** This has been corrected in Draft 3 of Version 0.

**53.2**

**53.2 R2.2**

Thomas Mielnik, MAPP PSDWG

In R2-2, replace: Regional Reliability Council

**Response:** Regional Reliability Council was replaced with Regional Reliability Organization.

**53.2 R2.2**

Narinder Saini, Entergy

Omit [Council] at end of paragraph as it was replaced by [Organization]

(agreed)

**Response:** Regional Reliability Council was replaced with Regional Reliability Organization.

**53.2\_R2**

Bob Jones, SERC Planning Stds Subcommittee

Marc Butts, Southern

Terry Blackwell, SCPSA

Delete the word "council."

**Response:** Regional Reliability Council was replaced with Regional Reliability Organization.

**53.2 R2-1**

Kevin Wright, Midwest ISO

Comment: Either Planning Authority should be added to R2-1 (The Planning Authority, Generator Owner....) or Planning Authority should be removed from M2-1 and R2-2, M2-1, and M2-2

**Response:** The Planning Authority was added to R2-1 and R2-2.

**53.2**

Narinder Saini, Entergy

Global comment: (1) In standard 053.2 and following standards, the use of and instead of or in the text (The Planning Authority, Transmission Planner, Generation Owner, Transmission Owner, Load Serving Entity, and Distribution Provider) implies an action taken together. Using or would be more correct. (2) Use of the indefinite pronoun its in conjunction with a plural subject (the text of the first part of this comment) is inappropriate.

M2-2: If the word and is not replaced by or then its should be their and assessment should be plural.

Several instances where [and] should be replaced by [or] when listing functional model entities in R2.2, M2.1 and M2.2

**Response:** To clarify what was intended, the word, 'each' was added. (Example : The Planning Authority, Transmission Planner and Distribution Provider shall each . . .

**53.2**

Raj Rana, AEP

Typo - "reliability assessments shall [delete] to NERC"

**Response:** The SDT could not link this comment to the identified standard.



**53.2**

Phil Park, BCTC

Kent McCarthy, Idaho Pwr Co

Rebecca Berdahl, BPA

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Ed Riley, CA-ISO Replace the word "cooperated" with "coordinated".

**Response:** Both words were used in the requirement, and the measure was modified to align with the requirement.

**53.2 (R\_21)?**

Robert Snow, Independent Contributor

Add "transmission owner" between individual and system planning criteria.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**53.2**

Howard Rulf, We Energies

Add a TO requirement to insure all affected parties are informed of planned connections in order to do their respective assessments.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**53.2\_R1**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Revise the following to read "R 2-1. The Generator Owner, Transmission Owner, Distribution Provider, or Load Serving Entity seeking to integrate generation facilities, transmission facilities, and electricity end-user facilities shall coordinate and cooperate with the Transmission owner with which they seek to connect, and other appropriate entities, on their respective assessments." This change is needed to identify who should be coordinated with.

**Response:** The purpose of this requirement is aimed at the coordination to support the reliability assessment, not the actual physical connection. Language was modified to clarify which entities need to 'coordinated with' – and to align with the FM this was changed to PA and TP.

**53.2\_R1**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

The phrase "evaluate the reliability impact of the new facilities and their connections on the interconnected transmission systems" is used redundantly in the introductory sentence and under item a). Delete the first occurrence.

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

**53.2 M2.1**

Al DiCaprio, MAAC

The requirement does not refer to PA or TP anywhere, yet the measure imposes an obligation on both the PA and TP.

**Response:** The Transmission Planner and Planning Authority were added as suggested.

**53.2 M2.2**

Al DiCaprio, MAAC

The requirement does not refer to PA or TP anywhere, yet the measure imposes an obligation on both the PA and TP.

**Response:** The Transmission Planner and Planning Authority were added as suggested.

**54.0**

**54.0**

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

Chifong Thomas

Kent McCarthy, Idaho Pwr Co

The last sentence in the Purpose should be delete as it repeats previously stated information.

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

**54.0 Purpose**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

The last sentence is redundant, delete it.

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

**54.0**

Narinder Saini, Entergy

Purpose: The parenthetical text at the end of the paragraph is not a complete sentence and does not make sense as written.

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

**54.1**

**54.1**

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

Kent McCarthy, Idaho Pwr Co

This standard should be deleted and not be part of the reliability standards. This should be covered by NAESB and FERC.

The reliability constraint should be that the calculation of the TTC must meet all of the reliability standards. 054.1 as it stands now does not require meeting the standards.

**Response:** The Standard will be retained here as a NERC Reliability Standard for V0 and then will go through the NERC/NAESB Joint Interface Committee process to determine what sections, if any, should be translated into NAESB Business Practices. NAESB has indicated it cannot address this standard prior to the development of V0 Business Practices, thus the standard is being retained in NERC's V0 to ensure that no requirements are lost during this translation.

**54.1**

Narinder Saini, Entergy

[explaining how] should not be deleted from subsection d

**Response:** Agreed.

**54.1**

Narinder Saini, Entergy

R1-1 e) This item contains three time frames and should be broken down into three separate items.

**Response:** Agree. Conforming changes were made to support this suggestion.

**54.1**

Narinder Saini, Entergy

Replace [Indication that] with [A narrative explaining the] in subsection f

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

**54.1**

Narinder Saini, Entergy

Compliance Monitoring Process: Timeframe: Remove current sentence and replace with (No timeframe requirement in version zero).

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**54.1\_R1**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Narinder Saini, Entergy

d). Reinsert the word "how" such that it reads "A description of how incomplete..."

f). Change "Indication that treatment" to "An indication of the treatment..."

g). Insert "A" at the beginning of the sentence.

**Response:** Your proposed changes do not change the intent and do improve the clarity, so they were adopted and are reflected in Draft 3 of Version 0.

Thomas Mielnik, MAPP PSDWG

For R1-1f. replace: Indication that treatment and level of customer demands, including interruptible demands. With: A narrative explaining how the level of customer demands, including interruptible demands, is considered.

**Response:** This part of the requirement was changed to clarify what was intended.

Karl Kohlrus

How come the Transmission Provider, e.g. RTO, not involved in this standard?

**Response:** The Transmission Service Provider is a 'user' of the values, but isn't required to develop a methodology for determining those values.

Al DiCaprio, MAAC

Delete "in conjunction with its members". Membership and governance of the RROs is not subject to NERC's approval.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

Al DiCaprio, MAAC

Item 'f' is unclear

**Response:** The SDT clarified what was item 'f'.

**54.2**

**54.2**

Jeffrey Miller, WECC Reliability Subcommittee  
Dr. J. Kondragunta, So CA Edison  
Phil Park, BCTC  
Kent McCarthy, Idaho Pwr Co

This standard should be deleted and not be part of the reliability standards. This should be covered by NAESB and FERC.

The reliability constraint should be that the calculation of the TTC must meet all of the reliability standards. 054.2 as it stands now does not require meeting the standards.

The reliability constraint should be that the calculation of the TTC must meet all of the reliability standards. 054.3 as it stands now does not require meeting the standards.

**Response:** The Standard will be retained here as a NERC Reliability Standard for V0 and then will go through the NERC/NAESB Joint Interface Committee process to determine what sections, if any, should be translated into NAESB Business Practices. NAESB has indicated it cannot address this standard prior to the development of V0 Business Practices, thus the standard is being retained in NERC's V0 to ensure that no requirements are lost during this translation.

**54.3**

Al DiCaprio, MAAC

Delete this standard. This is a business practice and should not be included as a reliability standard.

**Response:** The Standard will be retained here as a NERC Reliability Standard for V0 and then will go through the NERC/NAESB Joint Interface Committee process to determine what sections, if any, should be translated into NAESB Business Practices. NAESB has indicated it cannot address this standard prior to the development of V0 Business Practices, thus the standard is being retained in NERC's V0 to ensure that no requirements are lost during this translation.

**54.3**

Narinder Saini, Entergy

Compliance Monitoring Process: Timeframe: Remove current sentence and replace with (No timeframe requirement in version zero).

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**55.0**

**55.0**

Al DiCaprio, MAAC

PURPOSE: replace 'transmission system users' with 'transmission system operators'. Transmission users are not the ones that 'apply' CBM.

**Response:** The standard has been revised to omit the reference to transmission system users.

PURPOSE: delete paragraph " Regional Capacity Benefit Margin methodologies .... facilitate transactions." Facilitating transactions is a commercial issue not a reliability issue. Supplying data to Market participants is also a commercial obligation.

**Response:** The subject paragraph has been deleted as suggested.

**55.0**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Purpose: In the first sentence change the term "Transmission System Providers and Transmission Owners..." to "Transmission Service Providers..." changing "System" to "Service" and deleting the reference to Transmission Owners. The Functional Model implies that TRM is determined solely by Transmission Service Providers.

**Response:** The standard has been revised to reflect your correction.

**55.1**

**55.1**

Thomas Mielnik, MAPP PSDWG

In R1-1a. replace: Regional Organization With: Regional Reliability Organization.

**Response:** The standard has been revised to reflect your correction.

**55.1**

Narinder Saini, Entergy

Requirement has several references to [transmission provider's] in subsections e, f, and g that should be replaced by [Transmission Service Provider's]

**Response:** The standard has been revised to reflect your correction.

**55.1**

Narinder Saini, Entergy

Compliance Monitoring Process: Timeframe: Remove current sentence and replace with (No timeframe requirement in version zero).

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**55.1**

Robert Snow, Independent Contributor

It is only logical that CBM be coordinated between regions

**Response:** Agree. The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**55.1 R1.1**

Al DiCaprio, MAAC

Delete "in conjunction with its members". Membership and governance of the RROs is not subject to NERC's approval.

**Response:** Agree. The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

Al DiCaprio, MAAC

Delete item 'a': "Specify that the method used ... consistent with its generation planning criteria." How can this be a standard if neither NERC nor all of the RROs have generation planning criteria?

**Response:** Agree. The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**55.2**

**55.2**

Jeffrey Miller, WECC Reliability Subcommittee  
Rebecca Berdahl, BPA  
Dr. J. Kondragunta, So CA Edison  
Phil Park, BCTC  
Chifong Thomas

It is not clear what documents should be provided and what is an entity supposed to do in complying with this standard.

**Response:** This is an even translation and the evidence needed to demonstrate compliance to the Compliance Monitor is identified in the measures. (Procedure requiring periodic reviews; Results of the review; and evidence of submission of results)

**55.2**

Narinder Saini, Entergy

R2-1 d), R2-2, R2-3: These three sections do not appear to contain any substantive differences. Please clarify the sections so that the differences are more obvious.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**55.2 R1.1**

Al DiCaprio, MAAC

Item 'b' delete 'generation reliability requirent and associated' (see above)

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**55.2 R2.1**

Al DiCaprio, MAAC

Delete "in conjunction with its members". Membership and governance of the RROs is not subject to NERC's approval.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**55.2 R2.1**

Al DiCaprio, MAAC

Item 'b' delete "to ensure that the most current CBM values are available to users." CBM is not made available to users.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**55.2 R2.1**

Al DiCaprio, MAAC

Item 'c' delete last sentence "It is recognized ..." It is an editorial comment and does not belong in a reliability standard.

**Response:** Your proposed change does not change the intent of the requirement and was adopted.

**55.2 R2.1**

Al DiCaprio, MAAC

Delete Item 'd' see Item 'b' comment

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**55.2 R2.2**

Al DiCaprio, MAAC

Reword: delete 'results of' . The RRO is not required to provide NERC with its values. NERC may ask for the RRO's REVIEW procedures. Reword sentence to read: "Each Regional Reliability Organization shall make documentation of its Capacity Benefit Margin Review procedure available to NERC on request (within 30 calendar days)."

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

**55.2 R2.3**

Al DiCaprio, MAAC

Insert REVIEW beteen CBM and procedure. RRO's should provide NERC with how they, the RRO, will review CBM. Since NERC how no critieria for rating CBM, NERC has no need for the CBM procedure itself. Correct remaining sections that refer to procedure and change to Review Procedure.

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

**55.3**

**55.3\_R2**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Revise "their Capacity Benefit Margin use..." to "their Use of Capacity Benefit Margin..." Change all other occurrences in Levels of Non-Compliance 1 and 4.

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

**55.4**

**55.4\_R1**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Delete "Capacity Benefit Margin use" at the end of the last sentence.

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

**55.4**

Narinder Saini, Entergy

Compliance Monitoring Process: Timeframe: After the text presently in the standard, add the words (the documentation shall be posted on a website accessible by the Regional Reliability Organizations, NERC and the transmission users in the electricity market).

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**56.0**

**56.0**

Thomas Mielnik, MAPP PSDWG

Make the Levels of Non-compliance consistent.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**56.0 R1-2, M1-1**

Peter Henderson, IMO

Guy Zito, NPCC-CP9

A. Ralph Rufrano, NY Pwr Auth

Chris de Graffenried, NY Pwr Auth

Peter Lebro, National Grid

Section 1: R1-2, M1-1 “the Transmission System Providers and Transmission Owners ...” shall be read instead of “and the transmission users ...” to be consistent with the outlined purpose of this standard.

Section 2: 2-1d same comment as above.

**Response:** The change was implemented as suggested.

**56.0**

Al DiCaprio, MAAC

PURPOSE: delete "...and the resulting transmission reliability margin values" Data availability and posting is a Business and a FERC requirement, not a Planning or reliability issue.

**Response:** This change was implemented as suggested.

**56.1**

**56.1 R1.1**

Al DiCaprio, MAAC

Delete "in conjunction with its members". Membership and governance of the RROs is not subject to NERC's approval.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**56.1**

Narinder Saini, Entergy

Compliance Monitoring Process: Timeframe: Remove current sentence and replace with (No timeframe requirement in version zero).

**Response:** The language in Draft 2 was incorrectly placed as you suggested. The language from the most recently approved Planning Standard Compliance Template was inserted in its place.

**56.1**

Narinder Saini, Entergy

Reference to [Region's] that should be changed to [Regional Reliability Organization] or not capitalized

**Response:** ‘Regional’ should be capitalized whenever used in reference to one of the NERC Regions. When used to describe a more generic geographic area, the word should not be capitalized. Conforming changes have been made to Draft 3 of Version 0 to reflect your suggestion.

[Load distribution error] in subsection c after [Aggregate load forecast error] needs to be its own bulleted point

**Response:** This was a typographical error and has been corrected in Draft 3 of Version 0.

Do not delete [methodology] from Non-Compliance Level 1

**Response:** Agree.

**56.2**

**56.2**

Thomas Mielnik, MAPP PSDWG

For R2-3 replace: implementation with: review.

**Response:** The word, ‘review’ was inserted in several places throughout the standard to clarify the intent.



**56.2 R2.2**

Kirit Shah, Ameren

Insert REVIEW Procedure in both R2.2 and R 2.3 see similar comments above (agreed)

**Response:** The word, 'review' was inserted in several places throughout the standard to clarify the intent.

**56.2**

Narinder Saini, Entergy

[Available Transfer Capability] should be [Transmission Reliability Margin] in subsection c

**Response:** This error has been corrected in Draft 3 of Version 0.

Narinder Saini, Entergy

Reference to [Region's] that should be changed to [Regional Reliability Organization] or not capitalized in Non-Compliance Level 4

**Response:** 'Regional' should be capitalized whenever used in reference to one of the NERC Regions. When used to describe a more generic geographic area, the word should not be capitalized. Conforming changes have been made to Draft 3 of Version 0 to reflect your suggestion.

**56.2**

Narinder Saini, Entergy

Compliance Monitoring Process: Timeframe: Remove current sentence and replace with (No timeframe requirement in version zero).

**Response:** The language in Draft 2 was incorrectly placed as you suggested. The language from the most recently approved Planning Standard Compliance Template was inserted in its place.

**56.2 R2.1**

Al DiCaprio, MAAC

Item 'b' Delete "to ensure ... values available to users."

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**56.2 R2.1**

Al DiCaprio, MAAC

Item 'c' delete last sentence "It is recognized ..." It is an editorial comment and does not belong in a reliability standard.

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

**56.2 R2.1**

Al DiCaprio, MAAC

Item 'd' delete - Margin values not provided to users. (even translation – V1)

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**57.0**

**57.0**

Kirit Shah, Ameren

The guides section has been eliminated. These guides contain many critical items as stated in the black-out recommendations, such as the need for time synchronization and coordination with neighboring regions.

**Response:**

The SDT agrees that there is much valuable information contained within the Planning Guides. The Guides do not, however, contain any ‘mandatory’ requirements – rather they contain ‘good utility practices’. While this is useful background information, it is not part of a requirement. The SDT recommended that the Planning Committee update the guides to conform with the new standard numbering scheme, and re-issue these as Supporting Documents.

**57.2**

**57.2**

Thomas Mielnik, MAPP PSDWG

Larry Larson, Otter Tail Pwr

OTP supports adding 57.2 back to Version 0. Given the August 14, 2003 Northeast Blackout, we believe that a requirement for Transmission Owners and Generator Owners to install Disturbance Monitoring Equipment in accordance with the RRO plan is important.

**Response:** The question of whether to retain these standards in V0 was posted to the industry, and most industry commenters favored removing this from V0 and addressing this as an Urgent Action Standard.

**58.0**

**58.0**

Thomas Mielnik, MAPP PSDWG

Make the Levels of Non-compliance consistent.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**58.0**

**Rebecca Berdahl, BPA**

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

Chifong Thomas

Define whom the Responsible Entity is for providing the data. This appears to be a defined term, but it is not in the Glossary.

**Response:** The term, Responsible Entity has been replaced with more specific functional model entities.

**58.0**

Narinder Saini, Entergy

058.2 and 058.3 Compliance Monitoring Process Timeframes need to say [Data requirements and reporting procedure available on request: 5 business days] like 058.4, or use new wording in 058.1 [As specified within the applicable reporting procedures]

**Response:** Agreed. The Compliance Monitoring Process Timeframe for 058.2 was incorrect in Draft 2 and has been revised to retain the original language in Draft 3 of Version 0.

**58.1**

Thomas Mielnik, MAPP PSDWG

Delete parentheses around (Standard 058.1-R1-1 and 058.1-R1-2)

**Response:** This change was implemented and is reflected in Draft 3 of Version 0.

**58.1 R1.2**

Ed Riley, CA-ISO

Remove NERC from the list of parties the data shall be provided to.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**58.1\_R1.1\_M1.1**

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

Chifong Thomas

Peter Mackin, TANC

The term Interchange Transactions should be replaced with Interchange Schedule.

**Response:** This change was implemented and is reflected in Draft 3 of Version 0.

**58.1**

Narinder Saini, Entergy

[Regional] in R1-1; functional model entity or unnecessarily capitalized?

**Response:** Regional was deliberately capitalized as a defined term.

**58.1**

Raj Rana, AEP

The term "Responsible Entity" is capitalized, and therefore a defined term, but it is not defined. Therefore, either define the term as Generation and Transmission Owners, or list the "Responsible Entities" such as generation owner, transmission owner, etc. Making an 'entity' responsible to a NERC Reliability Standard via reporting procedures developed by each of the regions is dubious and surely not obvious which entities are subject to this standard.

**Response:** Several commenters suggested the phrase, 'responsible entity' be replaced, wherever possible, with the associated Functional entity. In this case, 'Responsible Entity' has been replaced with Planning Authority and Transmission Planner.

**58.1\_R1.1**

Narinder Saini, Entergy

R1-1 Bullet number one: Is the text (entity performing the study) the same as (responsible entity) found in 058.2, R2-1 bullet number 2? If so please be consistent in the terminology to avoid confusion.

**Response:** Several commenters suggested the phrase, 'responsible entity' be replaced, wherever possible, with the associated Functional entity. In this case, 'Responsible Entity' has been replaced with Planning Authority and Transmission Planner.

Narinder Saini, Entergy

R1-1 Bullet number six: To be consistent with R2-1 bullet number six, the words (and evaluated) should be added after (Be performed).

**Response:** This comment seems to be attached to the wrong standard.

**58.1 M**

Raj Rana, AEP

Typo - Remove "None identified" at end of description.

**Response:** This typo was corrected.

**58.1**

Narinder Saini, Entergy

Compliance Monitoring Process: Timeframe: Remove the M in Standard 058.2-R2-M1.

**Response:** This was updated to conform to the new standards format.

**58.2**

**58.2 R2.1**

Ed Riley, CA-ISO

In b, replace (net real and reactive power) with (gross real and reactive power).

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**58.2 R2.1**

Ed Riley, CA-ISO

In d, add line status, transformer ratings, and metering locations.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**58.2\_R1**

Bob Jones, SERC Planning Stds Subcommittee

Roman Carter, Southern

Terry Blackwell, SCPSA

Add the following after the first sentence: "The procedures shall include the identification of the entities responsible for the reporting of the data (referred to in 058.1 as 'Responsible Entity')".

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**58.2**

Chifong Thomas

Peter Mackin, TANC

Please change both occurrences of interchange transactions to interchange schedules in item (g). See reasoning given above in Question 12.

**Response:** This correction was made and is reflected in Draft 3 of Version 0.

**58.3**

**58.3**

Raj Rana, AEP

The term "Responsibe Entity" is capitalized, and therefore a defined term, but it is not defined. Therefore, either define the term as Generation and Transmission Owners, or list the "Responsible Entities" such as generation owner, transmission owner, etc. Making an 'entity' responsible to a NERC Reliability Standard via reporting procedures developed by each of the regions is dubious and surely not obvious which entities are subject to this standard.

**Response:** In draft 3 of Version 0, the entities are listed.

**58.3**

Raj Rana, AEP

Chifong Thomas

Peter Mackin, TANC

Narinder Saini, Entergy

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Please change the reference to Reliability Standard 058.4-R4 to Reliability Standard 058.4-R4-1 in the following three locations: Compliance Monitoring Process: Timeframe:, Levels of Noncompliance: Level 1:, and Levels of Non-compliance: Level 3:.. We believe only R4-1 is applicable and should be the correct reference.

**Response:** This error has been corrected.

**58.3**

Narinder Saini, Entergy

[Regional] in R3-1; functional model entity or unnecessarily capitalized?

**Response:** Regional is a defined term.

**58.4**

**58.4**

Thomas Mielnik, MAPP PSDWG

In R4-2, five business days is not long enough. If a key individual is unavailable, the standard may be violated.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**58.4**

Chifong Thomas

Peter Mackin, TANC

Please change static VAR controls to Static VAR controllers

**Response:** This was a typographical error and has been corrected in Draft 3 of Version 0.

**58.4**

Narinder Saini, Entergy

Chifong Thomas

Peter Mackin, TANC

M4-1:: Add the words (and shall provide the documentation as specified in Reliability Standard 058.4-R4-2) to the end of the sentence.

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

**58.4\_R1**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Add the following after the first sentence: "The procedures shall include the identification of the entities responsible for the reporting of the data (referred to in 058.3 as 'Responsible Entity')".

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**58.4\_R1**

Kirit Shah, Ameren

Item 'c' delete "as a function of frequency and voltage" Not everyone has this and there is no NERC standard for such characteristics.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

In item d), change the reference to "Reliability Standard 058.1-R1" to "Reliability Standard 058.1-R1-1."

**Response:** This was a typographical error and has been corrected in Draft 3 of Version 0.

**58.4**

Chifong Thomas  
Peter Mackin, TANC

There appears to be extra text at the end of this requirement. Please remove the following text from the end of the sentence: on request (five business days). This requirement is already stated earlier in the same sentence

**Response:** One of the references to five business days was deleted.

**58.5**

**58.5**

Gerald Rheault, Manitoba Hydro  
The RRO referenced here is not an entity identified in the Functional Model

**Response:** Agreed. However, the Regional Reliability Organization is a defined term in the glossary.

**58.5 M5.1**

Tracy Edwards, BPA  
Rebecca Berdahl, BPA  
Deanna Phillips, BPA

Measure M5-1 Measure should not be that the RRO has evidence that it contributed to the development of cases but rather that the cases are available and solved so that the measure matches the Compliance Levels.

**Response:** Agreed. The suggested change was implemented.

**58.5**

Narinder Saini, Entergy

Levels of Non-compliance: A discrepancy exists between the second sentence of the paragraph: (Violations will not be assessed for Data Sets posted by the scheduled dates.) and the violation content for both level 1 and level 2. These two levels state that violations exist when the data was submitted by the deadline but was (not fully solved) etc.

**Response:** The posting date refers to the MMWG posting date for the 'final' cases, and is referenced in the standard's footnote.

**58.6**

**58.6**

Thomas Mielnik, MAPP PSDWG  
In M6-1, also refer to 058.6-R6-2.

**Response:** Agreed. The suggested change was implemented.

**58.6**

Chifong Thomas  
Peter Mackin, TANC

We believe there is a grammatical error in the second paragraph of Requirement 6-1. The last four words of this paragraph should probably be changed from: each of that Interconnection to: each Interconnection.

**Response:** Agreed. The suggested change was implemented.

**58.6**

Narinder Saini, Entergy  
[send] should be [and]

**Response:** Agreed. The suggested change was implemented.

**58.6**

Narinder Saini, Entergy

R6-2 is listed as a separate requirement but a similar statement in R5-1 is not defined as a separate requirement

**Response:** The standard has been revised as suggested.

**58.6**

Gerald Rheault, Manitoba Hydro

The RRO referenced here is not an entity identified in the Functional Model

**Response:** The Regional Reliability Organization is in the glossary.

**58.6 M6.1**

Deanna Phillips, BPA

Tracy Edwards, BPA

Rebecca Berdahl, BPA

Measure M6-1 should not be that the RRO has evidence that it contributed to the development of the models but rather that the models are available and solved and included no errors so that the measure matches the Compliance Levels.

**Response:** The standard has been revised to clarify what was intended.

**58.6\_R2**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

To be consistent with 058.5 R5-1, combine 058.6 R6-2 with R6-1.

**Response:** These were both subdivided to be consistent.

**60.0**

**60.0 R1.2**

Ed Riley, CA-ISO

Add Reliability Authority to list of parties to receive documentation in addition to the RRO and NERC.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**60.0**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

In both 060.1 and 060.2, to be consistent use either "methodology(ies)" or "methodology(s)." Both are now used at various places throughout the standards.

**Response:** Agreed – the term, methodology(ies) was used throughout the revised standard.

**60.0**

Peter Mackin, TANC

Methodology(s) and Methodology(ies) are both used throughout this standard. We believe that Methodology(ies) should be the preferred form to use.

**Response:** Agreed – the term, methodology(ies) was used throughout the revised standard.

Kirit Shah, Ameren

1. In Standard 060.1-The term Methodology(s) should be replaced by Methodology(ies).

Under Level of Non-Compliance five elements (1-5) should be replaced by five elements (a-e).

**Response:** Agreed – the term, methodology(ies) was used throughout the revised standard.

The reference to five elements (1-5) was modified to simply say, 'five elements'.

**60.1**

**60.1**

Bob Jones, SERC Planning Stds Subcommittee  
Terry Blackwell, SCPSA

Levels of Non-compliance: Change references to "elements (1-5)" to "elements (a-e)."

**Response:** This was modified to omit the parenthetical phrase.

**60.1**

Thomas Mielnik, MAPP PSDWG

R1-2 refers to transmission facility and equipment ratings when R1-1 (a) spells out these elements.

Recommend changing the phrase in R1-2 to say ...used to determine its facility and equipment ratings as specified in 060-R1-1. to the Regional Reliability Organization(s)...

**Response:** The measure includes the reference to the first requirement.

**60.1**

Tracy Edwards, BPA  
Deanna Phillips, BPA  
Deborah Linke, US Bureau of Reclamation  
Rebecca Berdahl, BPA

Requirement R1-1, item a should included the words -as applicable for each owner- after the words -the items listed-. Not all owners will have all the pieces of equipment listed.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**60.1**

Chifong Thomas  
Peter Mackin, TANC

The terms -facility-, -electrical facility-, and -transmission facility are used interchangeably throughout the Requirements and Measurements sections. We suggest just using one term throughout the document.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**60.1**

Deanna Phillips, BPA  
Rebecca Berdahl, BPA

Requirement R1-1 also includes the requirement for Generator owners to provide data. However the list does not include any generation equipment. Although information on the generation equipment is necessary, it is not included in the existing standard. This needed information should be flagged as missing for the Transmission Plan SAR 500 Team to address.

**Response:** Some of the equipment identified in the standard, such as transformers and breakers, may be owned by Generator Owners. We suggest you submit this comment on SAR 500.

**60.2**

**60.2**

Karl Kohlrus

This standard applies to Generator Owners. I suppose this means the transmission-related terminal equipment such as transformers, breakers and substation equipment. There should be a separate standard on the rating of generating equipment including both MW and MVAR. Such a standard should also include standards for rating intermittent resources such as wind farms.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.



**60.2**

Chifong Thomas  
Peter Mackin, TANC

The terms -facility-, -electrical facility-, and -transmission facility are used interchangeably throughout the Requirements and Measurements sections. We suggest just using one term throughout the document.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**61.0**

**61.0**

Thomas Mielnik, MAPP PSDWG

Levels of non-compliance should be made consistent.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**61.0**

Thomas Mielnik, MAPP PSDWG

In M1-1, replace: have a procedure with: make available its procedure.

**Response:** Your comment must be attached to the wrong standard because M1 does not contain the referenced language.

**61.0**

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

Resource Planner should not be included in this requirement. RS does not see a need for this.

**Response:** The Functional Model does indicate that the requirements in this standard are assigned to the Resource Planning Function. Reference pages 22-23 of the Functional Model.

**61.0**

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

These requirements are not consistent with current reporting practices in the west. Entities report information to WECC and WECC reports to NERC. This standard would require the LSA, PA and RP each to report to several entities.

**Response:** According to the Functional Model, the listed functions are responsible for providing data – these functions can delegate this task to WECC, but would still be held responsible for the requirement.

**61.0**

Peter Henderson, IMO

Section 1: Under "Level 1 of Non-Compliance", "... and 061.1-R1- 1." shall be read instead of "... 061." to be consistent with the standard.

Section 1: Under "Level 4 of Non-Compliance", "... and the reporting procedures as required in Reliability Standard 061.1-R1-1." shall be read instead of "... and the reporting procedures." to be consistent with the standard.

**Response:** Agreed. This change was implemented as suggested.

**61.0**

Robert Snow, Independent Contributor

All Actual and Forecast Demands must include the respective weather data to be useful. Any entity responsible for reliability has included weather data, such as THI, with the actual and forecast data.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**61.1**

61.1

Gerald Rheault, Manitoba Hydro

The RRO referenced here is not an entity identified in the Functional Model

**Response:** The Regional Reliability Organization is not in the Functional Model, but it is a defined term.

**61.2**

61.2

Robert Snow, Independent Contributor

Include this section in the next version as in version 0.

**Response:** This is up to the industry, not the SDT.

**61.3**

61.3

Robert Snow, Independent Contributor

Include this section in the next version as in version 0.

**Response:** This is up to the industry, not the SDT.

**61.5**

61.5\_M1

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

The measurement does not appear to be addressing the focus of 061.5. Change the term "actual and forecast demand data was" to read "nonmember entity demand data and forecast uncertainties were."

**Response:** The original language was more specific and has been retained for draft 3 of Version 0.

**61.5**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Levels of Non-compliance: in Level 1 change "061.5-R51- items a) or 061.5-R51- b)" to read "061.5-R5-1 item a or b." In Level 2 change "061.5-R51- items a) and 061.5-R51-b)" to read "061.5-R5-1 items a and b."

**Response:** The format has been changed for all standards – conforming changes were made to support your suggestion.

**61.6**

61.6\_R1

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Change "Regions" to "Regional Reliability Organizations."

**Response:** Agreed. This change was implemented for all the planning-related standards.

**61.6**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Levels of Non-compliance, Level 4: While it is a direct translation, the term "controlled demand-side management data" should be changed to "interruptible demands and direct control load management" to be consistent with the rest of the standard.

**Response:** Your proposed change does not change the intent and does improve the clarity, so it was adopted and is reflected in Draft 3 of Version 0.

Kirit Shah, Ameren

The Level 4 non-compliance seems a bit harsh (as compared to other Level 4's) for not having some data.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**61.7**

**61.7**

Peter Henderson, IMO

In R7-1, "... load management to Reliability Authority(ies) Coordinators and Transmission Operator(s) on request ..." shall be read instead of "...load management to system operators and security center coordinators on request ..." to be consistent with the standard.

**Response:** This section was modified to indicate that the information shall be provided to RCs, TOPs and BAs.

**61.7\_R1**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Change "system operators and security center coordinators" to "Reliability Authority(ies) and Transmission Operator(s)" to be consistent with 061.7 M7-1.

**Response:** This section was modified to indicate that the information shall be provided to RCs, TOPs and BAs.

**61.7**

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

Chifong Thomas

R7-1 and M7-1 are not consistent with respect to whom the data should be reported to. It appears that M7-1 is correct and R7-1 is in error.

**Response:** This section was modified to indicate that the information shall be provided to RCs, TOPs and BAs.

Karl Kohlrus

In the title who is a Security Center Coordinator? Did you mean Reliability Authority or Transmission Operator?

**Response:** The original document referenced 'Security Center Coordinator' which was the original name of the Reliability Coordinator. This has been updated to Reliability Coordinator.

**61.7\_R2.1**

Guy Zito, NPCC-CP9

A. Ralph Rufrano, NY Pwr Auth

Chris de Graffenried, NY Pwr Auth

Peter Lebro, National Grid

“... load management to Reliability Coordinators and Transmission Operator(s) on request ...” shall be read instead of “...load management to system operators and security center coordinators on request ...” to be consistent with the standard.

**Response:** This section was modified to indicate that the information shall be provided to RCs, TOPs and BAs.

**61.8**

**61.8\_M1**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

M8-1 is basically a repeat of R8-1. To be consistent with similar measurements, revise it to read: "The Load Serving Entity's, Planning Authority's and Resource Planner's forecasts shall each be clearly documented per Reliability Standard 061.8-R8-1."

**Response:** The original language seemed clear enough and was not changed.

**61.8\_M2**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

M8-2 is basically a repeat of R8-2. To be consistent with similar measurements, revise it to read: "The Load Serving Entity's, Planning Authority's and Resource Planner's forecasts shall each include information per Reliability Standard 061.8-R8-2."

**Response:** The original language seems clear enough and was not changed.

**63.0**

**63.0**

Kirit Shah, Ameren

It is recommended that the old section III Discussion section remain. It also recommended that the Introduction, Standard S1 and S2, and Measurements M1 and M2 from the old standard be carried over to the new standard 63. The guides section has been eliminated. These guides contain many critical items as stated in the black-out recommendations, such as restricted use of zone-3 relays and coordination with neighboring utility systems.

**Response:** The SDT agrees that there was much valuable information contained within the original Introductions, Guides and Discussions. This is useful background information, but does not contain any requirements. New Reliability Standards do not contain explanatory information. The extra information should be included in a supporting document, not in the standard.

**63.0**

Peter Henderson, IMO

Section 2: It is suggested to add "facilities" after "...that owns protection system(s)..." In R2-1 and R2-2. R2-1 and R2-2 define requirements for transmission, generation owners and Distribution providers, while Standard 053.1 refers to transmission, generation and End-use facilities. 053.2 goes on to infer End-use facilities are owned by Distribution providers and Load Serving Entities (LSE).

But 063.2 excludes LSEs. Suggest the same entities be used consistently throughout.

**Response:** The SDT modified the standard to use the phrase, ‘ . . . that owns a transmission protection system. . . ’ While the LSE isn't the ‘owner’ of end-use facilities, it does play a role in identifying the need for new facility connections.

**63.0**

Tracy Edwards, BPA

I thought that version 0 was just a reformatting of the old standards. But it appears some standards have been omitted. For transmission protection, 063, the old standard III.A.S2 that required sufficient redundancy to eliminate a single point of failure has been omitted.

There is something similar to this for the special protection /RAS standards but not for line protection. I think this should be included. Lack of redundancy was critical to the June 14, 2004 Westwing disturbance in WECC.

**Response:** The Planning Committee dropped 'S2' several years ago – therefore it was not included in the documents used for this translation to Version 0.

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

It does not appear that III.A.M2 was translated into the Version 0 standard.

**Response:** The Planning Committee dropped 'III.A.M2' several years ago – therefore it was not included in the documents used for this translation to Version 0.

**63.0**

Rebecca Berdahl, BPA

This is a standard that should not be changed - use the original language.

**Response:** Agreed.

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

RS believes this is a standard that should not be changed. This standard has been translated very well and the confusing parts of the old standard have been resolved.

**Response:** Agreed.

**63.1**

**63.1 R1.1**

Kirit Shah, Ameren

Change 'monitoring' to 'reporting'. It would be difficult to monitor all facilities, the SDT could expect reporting of events.

Also for R1.1 item 'a'; Measure 1.1

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**63.1**

Thomas Mielnik, MAPP PSDWG

In M1-1, replace: have a procedure with: make available its procedure.

**Response:** The original language was accepted by most in the industry, so no change was made.

**63.2**

**63.2\_R1**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Add the word "and" between "Generator Owner" and "Distribution Provider."

This also applies to R2-2.

**Response:** Agreed – this change was implemented and is reflected in Draft 3 of Version 0.

**63.3\_R2**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Include Distribution Providers that owns transmission protection system(s). Since they are included in 62.2 they should also be included in 63.3.

This change should also be applied to measures M3-1 and M3-2

**Response:** The SDT tried to improve the consistency with this series of standards. Under the Functional Model, the LSE doesn't necessarily 'own' facilities. Where the LSE was retained, the LSE was referenced as an entity that 'operates' the facilities.

**63.2\_R2.1**

Guy Zito, NPCC-CP9

Chris de Graffenried, NY Pwr Auth

Peter Lebro, National Grid

It is suggested to add "facilities" after "...that owns protection system(s)..." In R2-1 and R2-2.

R2-1 and R2-2 define requirements for transmission, generation owners and Distribution providers, while Standard 053.1 refers to transmission, generation and End-use facilities. 053.2 goes on to infer End-use facilities are owned by Distribution providers and Load Serving Entities (LSE). But 063.2 excludes LSEs. Suggest the same entities be used consistently throughout.

**Response:** The original language was accepted by most in the industry, so no change was made.

**63.3**

**63.3**

Richard Kafka, Pepco

A general question that applies to several standards - what voltage level will define Transmisison Facilites or will some other measure define Transmisison Facilites?

**Response:** The V0 SDT developed a definition of Bulk Electric System that will be presented to the industry in the revised glossary for Reliability Standards. The Forward to V0 will include a statement to indicate that the standards are intended to preserve the reliability of the Bulk Electric System. There will be no definitive voltage level used to determine what entities must comply with these standards.

**63.3**

Thomas Mielnik, MAPP PSDWG

Replace Standard 63.3 title: Transmission Protection Maintenance and Testing with: Transmission Protection System Maintenance and Testing".

**Response:** Agreed – this change is reflected in the 3<sup>rd</sup> draft of Version 0.

**65.0**

**65**

Kirit Shah, Ameren

Section M4 from the old standard, which required generator owners to provide operating characteristics of their generating equipment or protective relay or controls was not carried over. The guides section has been eliminated. These guides contain many critical items as stated in the black-out recommendations. These guides should be maintained as explanation of "good utility practice" in many of our parallel operating agreements.

**Response:** The SDT agrees that there was much valuable information contained within the original Introductions, Guides and Discussions. This is useful background information, but does not contain any requirements. New Reliability Standards do not contain explanatory information. The extra information should be included in a supporting document, not in the standard.

**67.0**

**67.0**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

General Comments:

1. There needs to be consistency in the use of either "Under Frequency" or "Underfrequency." The current compliance templates use "Underfrequency."

**Response:** This term was added to the glossary as a single word and was changed throughout the planning standards to conform to the spelling used in the glossary.

**67.1**

**67.1\_R1**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Un-capitalize the word "Program" in the first sentence and in item c.

**Response:** This error was corrected and the word, 'program' is not capitalized in Draft 3 of Version 0.

**67.1M1**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Un-capitalize the words "Program" and "Current."

**Response:** These errors were corrected and the words, 'program' and 'current' are not capitalized in Draft 3 of Version 0.

**67.2**

**67.2**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Levels of Non-compliance, Level-1: change the reference to "Reliability Standard 067.1-R1" to read "Reliability Standard 067.1-R1-1."

**Response:** A new format was adopted for Version 0, and the reference was changed to follow the new format.

**67.2**

Robert Snow, Independent Contributor

Include the measures in the original standard.

**Response:** Measures were included in Draft 2 of Version 0 and have been retained for Draft 3 of Version 0.

**67.3**

**67.3**

Ed Riley, CA-ISO

Remove Transmission Operator from R3-1, R3-2, M3-1, and M3-2. The Transmission Operator is not responsible for equipment maintenance programs. This item could be a show stopper for the California ISO and has been identified as such in Question 11.

**Response:** Agreed. This error has been corrected and Draft 3 of Version 0 does not include the TOP in these requirements.

**67.3\_R and M**

Chifong Thomas

Peter Mackin, TANC

Required -results- are unclear. Suggest changing to read -... shall provide evidence of implementation and compliance with schedules to test and maintain to the Regional ...-.

**Response:** The wording was changed to clarify the intent.

**67.4**

**67.4**

Howard Rulf, We Energies

Why include LSE here and not also in 067.2 and 067.3?

**Response:** Under the Functional Model, the LSE doesn't own equipment, but may operate equipment (implements load shedding). The original standard included the language, 'entities that own or operate'. Standard 67.2 requires entities to ensure that their UFLS programs are consistent with Regional UFLS requirements. An entity that merely operates equipment would not be expected to be responsible for this requirement. Standard 67.3 (MOD-008-0) applies to entities that own the equipment, so the LSE was not included. Standard 67.4 (MOD-009-0) requires entities to analyze the performance of UFLS programs – and since the LSE may have used the program, the LSE needs to provide feedback on the program.

**67.4**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

General Comment: Since load serving entities are not included in Standards 067.2 and 067.3, they should also not appear in 067.4.

**Response:** Under the Functional Model, the LSE doesn't own equipment, but may operate equipment (implements load shedding). The original standard included the language, 'entities that own or operate'. Standard 67.2 requires entities to ensure that their UFLS programs are consistent with Regional UFLS requirements. An entity that merely operates equipment would not be expected to be responsible for this requirement. Standard 67.3 (MOD-008-0) applies to entities that own the equipment, so the LSE was not included. Standard 67.4 (MOD-009-0) requires entities to analyze the performance of UFLS programs – and since the LSE may have used the program, the LSE needs to provide feedback on the program.



**67.4\_R1**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Insert a comma between the words "program" and "shall," such that it reads "...required by the Regional Reliability Organization to have an underfrequency load shedding program, shall analyze..."

**Response:** This requirement was revised so that the comma is no longer needed.

**67.4\_M1**

Terry Blackwell, SCPSA

Bob Jones, SERC Planning Stds Subcommittee

Change M4-1 to read: "The Transmission Owner's, Transmission Operator's, and Distribution Provider's (required by the Regional Reliability Organization to have an underfrequency load shedding program) analysis and documentation of underfrequency load shedding program performance following an underfrequency event shall include all elements identified in Reliability Standard 067.4-R4-1." This change is needed to fix the incorrect use of the apostrophe in the phrase "shedding program's analysis".

**Response:** This measure was revised to improve its clarity such that the use of the apostrophe is no longer an issue.

**68.0**

**68.0**

Thomas Mielnik, MAPP PSDWG

In purpose replace: end users of electricity on the bulk electric system to drop loads. with: the dropping of end use load from the bulk electric system. The standard does not require action by the end users, it requires action by the LSEs, TOs, TOP, and DP.

**Response:** The purpose statement was revised to omit the reference to dropping of loads.

**68.0**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Purpose: Revise the end of the first sentence from "...requiring end users of electricity on the bulk electric system to drop loads" to read "requiring the interruption of electrical supply to end users."

**Response:** The purpose statement was revised to omit the reference to dropping of loads.

**68.0**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

General Comments:

1. There needs to be consistency in the use of either "Under Voltage" or "Undervoltage." The original compliance templates used "Undervoltage."
2. Since load serving entities are not included in Standard 067, they should also not appear in Standard 068.

**Response:** Agreed. The glossary uses the word, 'Undervoltage' and the standards were revised to reflect this.

The standards in the UFLS and UVS sequence were revised to include the Transmission Owner and Distribution Provider for all requirements related to owners of the equipment. For requirements where the LSE or TOP may operate these UFLS or UVLS programs, the LSE and TOP were added to the list of entities that are required to assess effectiveness and provide data related to the operation of these programs. This seems to be consistent with the Functional Model.

**68.3**

**68.3**

Thomas Mielnik, MAPP PSDWG

Add at the end of M3-1, in their undervoltage loadshedding program technical assessment. The elements in R3-1, are for inclusion in Technical Assessments of undervoltage loadshedding programs not for programs themselves.

**Response:** This measure was revised to clarify what was intended.

**68.3**

Thomas Mielnik, MAPP PSDWG

In Non-Compliance Level 4, clarify what one of the requirements means. MAPP PSDWG prefers breaking this level into two levels of non-compliance.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**68.3\_M1**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Revise the phrase "shall include" to read "shall have an assessment which includes."

**Response:** This measure was revised to clarify what was intended.

**68.3**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Levels of Non-compliance, Level 4: revise the reference to "Reliability Standard 068.3-R3" to read "Reliability Standard 068.3-R3-1."

**Response:** Conforming changes were made to support this suggestion.

Kirit Shah, Ameren

Should NERC be requiring the creation of Databases?

**Response:** The SDT is translating, not evaluating the appropriateness of the source documents.

**68.4**

**68.4**

Thomas Mielnik, MAPP PSDWG

In R4-2, replace: Regions with: Regional Reliability Organizations.

**Response:** Your suggested change was implemented and is reflected in Draft 3 of Version 0.

**68.4**

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

The statement: shall provide documentation of the program and its implementation; should be replaced by: shall provide documentation of the maintenance and testing program and its implementation

**Response:** The standard has been changed to reflect this suggestion.

**68.5**

Robert Snow, Independent Contributor

Return this section to the standard. It proved useful after the August blackout.

**Response:** This is up to the industry, not the SDT.

**69.0**

**69.0**

Ed Riley, CA-ISO

The way this is currently written it could apply to any SPS. It should be rewritten to indicate that it only applies to SPS's that protect the Interconnection as a whole and not SPSs that are installed for local reliability problems.

**Response:** This should be addressed in the Region's criteria and associated procedure for reviewing SPS's

**69.1**

**69.1**

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

Chifong Thomas

Suggest renaming title to Special Protection System REVIEW Procedure.

**Response:** Agree. This change was implemented and is reflected in Draft 3 of Version 0.

Jeffrey Miller, WECC Reliability Subcommittee

Dr. J. Kondragunta, So CA Edison

Phil Park, BCTC

Chifong Thomas

RS believes that only SPS with regional impact should have a review requirement.

**Response:** This should be addressed in the Region's criteria and associated procedure for reviewing SPS's

Peter Henderson, IMO

As currently stated, the levels of non-compliance are not selective. Some of the items listed in R1-1 are more critical than others. Missing R1-1 c is not the same as missing R1-1 h.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**69.2**

**69.2 R2.1**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Change the term "Reliability Authorities" to read "Regional Reliability Organizations."

**Response:** This error has been corrected in Draft 3 of Version 0.

**69.3**

**69.3**

Terry Blackwell, SCPSA

Bob Jones, SERC Planning Stds Subcommittee

Levels of Non-compliance: Levels 1 and 2 use the phrase "The summary (or detailed) Regional Reliability Organization Special Protection System assessment," while Levels 3 and 4 use "The Regional Reliability Organization's summary (or detailed) Regional Reliability Organization Special Protection System assessment." This needs to be made consistent.

**Response:** The levels of non-compliance were revised so they all start with the same phrase.

**69.3\_R2**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

Change the term "Reliability Authorities" to read "Regional Reliability Organizations."

**Response:** This error has been corrected in Draft 3 of Version 0.

**69.6**

**69.6 R6.1**

Ed Riley, CA-ISO

In f, it needs to be changed to require that the last two dates of testing and maintenance are kept. This is necessary to verify an action that is required bi-annually or bi-monthly.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**70.0**

**70.0**

Rebecca Berdahl, BPA

All existing measurements in the original standards need to be included in the Version 0 document.

Partial measurement compliance does not achieve industry compliance to the standard.

Include the introduction language of the original NERC standards. Functional model entities need to include power pools.

**Response:** Power Pools do not have a 'one for one' association with Functional Model entities. This standard does not assign any requirements to Power Pools. The language in draft 2 was an even translation. Making the suggested change to the levels of non-compliance is a Version 1 issue.

**70.1**

**70.1**

Rebecca Berdahl, BPA

As written it is unclear what must be reported as a blackstart unit. For hydro generation facilities, the house unit at a hydro plant is the blackstart unit and not each unit at the facility - this interpretation should be clarified in the Version 0 Standard.

**Response:** If a particular unit is classified as a blackstart unit in the associated Region's Restoration Plan, then that unit must be reported as a blackstart unit under this standard.

**70.1**

Bob Jones, SERC Planning Stds Subcommittee

Terry Blackwell, SCPSA

The Testing Frequency requirement listed in R1-1c should clarify that generator owners who own less than three blackstart units do not have to retest the same unit consecutively (every year) as long as the generator owner tests its blackstart unit(s) every three years.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

**70.4**

**70.4**

Jeffrey Miller, WECC Reliability Subcommittee

Phil Park, BCTC

Chifong Thomas

As written it is unclear what must be reported as a blackstart unit. RS interprets that a house unit at a hydro plant would be the blackstart unit and not each unit at the facility.

**Response:** If a particular unit is classified as a blackstart unit in the associated Region's Restoration Plan, then that unit must be reported as a blackstart unit under this standard.

**72.0**

**72.0 M1.2**

Kenneth Goldsmith, Alliant Energy

Please add the following: . . . annual work plan with supporting documentation maintained at a central location.

**Response:** This seems overly restrictive, and doesn't add to reliability.

**72.0**

Guy Zito, NPCC-CP9

A. Ralph Rufrano, NY Pwr Auth

Chris de Graffenried, NY Pwr Auth

Peter Lebro, National Grid

Peter Henderson, IMO

Compliance Monitoring Process-

The basic goal of reporting vegetation contact is to more quickly identify the proximity of growing vegetation to critical transmission, and the threat posed, and to further identify possible trends suggesting poor vegetation management on the part of a given TO. It is the opinion of the NPCC Task Force on Coordination of Operation that the above exceptions permitted in the current standard contradict the very intent of the vegetation reporting program and considerably weaken the effort. Such exceptions must not be permitted if the initiative is to succeed.

**Response:** The language in draft 2 was an even translation. Making the suggested change is a Version 1 issue.

Karl Kohlrus

The Levels of Non-Compliance is not in a consistent format with other standards.

**Response:** Agreed – but it is a direct translation.