

Consideration of Comments

Project 2010-INT-01

The Project 2010-INT-01 Drafting Team thanks all commenters who submitted comments on TOP-006-3 - Monitoring System Conditions. These standards were posted for a 45-day public comment period from June 14, 2012 through July 30, 2012. Stakeholders were asked to provide feedback on the standard and associated documents through a special electronic comment form. There were 32 sets of comments, including comments from approximately 143 different people from approximately 84 companies representing all 10 Industry Segments as shown in the table on the following pages.

The SDT reminds the industry that it was working under the constraints of the rapid revision project and that only those items authorized in the rapid revision project SAR can be changed.

The SDT would also like to point out that some of the comments made here are addressed in Project 2007-03, which dealt with clarifying requirement language and eliminating redundancy in the TOP standards. This project has been approved by the NERC Board of Trustees.

Several commenters pointed to a redundancy in Requirement R1.3. The SDT agrees with these comments and has made the clarifying change needed to remove this redundancy.

Several commenters pointed to a lack of clarity in Requirement R3. The SDT agrees with these comments and has made a clarifying change.

Commenters also pointed to the apparent redundancy in the VSL for Requirement R3. The SDT has made a clarifying change within the constraints of the rapid revision process that will be posted in the VRF/VSL non-binding poll.

The SDT has made only clarifying changes to the requirements and has not changed the context of any requirement. Therefore, the SDT is requesting that this project be moved to recirculation ballot.

All comments submitted may be reviewed in their original format on the standard's [project page](#).

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Vice President of Standards, Mark Lauby, at 404- 524-7077 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Standard Processes Manual: http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf

Index to Questions, Comments, and Responses

1. The SDT has altered Requirement R1.2 to apply solely to Transmission Operators and transmission information while creating a new Requirement R1.3 to apply solely to Balancing Authorities and generation information. Do you agree with these changes? This includes accompanying Measures, data retention, and VSLs. If not, please provide a detailed explanation and suggested changes. .. 10
2. The SDT has revised Requirement R3 to show that entities need only supply information for equipment they are responsible for and not for others equipment. Do you agree with this change? If not, please provide a detailed explanation and suggested changes. 20
3. The SDT has supplied suggested Time Horizons for all requirements. Do you agree with these assignments? If not, please provide a detailed explanation and suggested changes. 30
4. The SDT has supplied an Implementation Plan for this project. Do you agree with this plan? If not, please provide a detailed explanation and suggested changes..... 33
5. If you have any other comments on this Standard that you haven't already mentioned above, please provide them here keeping in mind the limited scope of this rapid development project: . 36

The Industry Segments are:

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

Group/Individual		Commenter	Organization	Registered Ballot Body Segment											
				1	2	3	4	5	6	7	8	9	10		
1.	Group	Guy Zito	Northeast Power Coordinating Council												x
Additional Member		Additional Organization		Region	Segment Selection										
1.	Alan Adamson	New York State Reliability Council, LLC		NPCC	10										
2.	Carmen Agavriloi	Independent Electricity System Operator		NPCC	2										
3.	Greg Campoli	New York Independent System Operator		NPCC	2										
4.	Sylvain Clermont	Hydro-Quebec TransEnergie		NPCC	1										
5.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.		NPCC	1										
6.	Gerry Dunbar	Northeast Power Coordinating Council		NPCC	10										
7.	Mike Garton	Dominion Resources Services, Inc.		NPCC	5										
8.	Kathleen Goodman	ISO - New England		NPCC	2										
9.	Michael Jones	National Grid		NPCC	1										
10.	David Kiguel	Hydro One Networks Inc.		NPCC	1										

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
11. Michael Lombardi	Northeast Utilities	NPCC	1																	
12. Randy MacDonald	New Brunswick Power Transmission	NPCC	9																	
13. Bruce Metruck	New York Power Authority	NPCC	6																	
14. Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5																	
15. Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																	
16. Robert Pellegrini	The United Illuminating Company	NPCC	1																	
17. Si-Truc Phan	Hydro-Quebec TransEnergie	NPCC	1																	
18. David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5																	
19. Brian Robinson	Utility Services	NPCC	8																	
20. Michael Schiavone	National Grid	NPCC	1																	
21. Wayne Sipperly	New York Power Authority	NPCC	5																	
22. Donald Weaver	New Brunswick System Operator	NPCC	2																	
23. Ben Wu	Oragne and Rockland Utilities	NPCC	1																	
24. Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3																	
2.	Group	WILL SMITH	MRO NSRF	X	X	X	X	X	X											
	Additional Member	Additional Organization	Region	Segment Selection																
1.	MAHMOOD SAFI	OPPD	MRO	1, 3, 5, 6																
2.	CHUCK LAWRENCE	ATC	MRO	1																
3.	TOM BREENE	WPS	MRO	3, 4, 5, 6																
4.	JODI JENSON	WAPA	MRO	1, 6																
5.	KEN GOLDSMITH	ALTW	MRO	4																
6.	ALICE IRELAND	XCEL	MRO	1, 3, 5, 6																
7.	DAVE RUDOLPH	BEPC	MRO	1, 3, 5, 6																
8.	JOE DEPOORTER	MGE	MRO	3, 4, 5, 6																
9.	SCOTT NICKELS	RPU	MRO	4																
10.	TERRY HARBOUR	MEC	MRO	1, 3, 5, 6																
11.	MARIE KNOX	MISO	MRO	2																
12.	LEE KITTELSON	OTP	MRO	1, 3, 4, 5																
13.	SCOTT BOS	MPW	MRO	1, 3, 5, 6																
14.	TONY EDDLEMAN	NPPD	MRO	1, 3, 5																
15.	MIKE BRYTOWSKI	GRE	MRO	1, 3, 5, 6																
16.	DAN INMAN	MPC	MRO	1, 3, 5, 6																

Group/Individual	Commenter	Organization	Registered Ballot Body Segment											
			1	2	3	4	5	6	7	8	9	10		
17. ERIC RUSKAMP	LES	MRO	1, 3, 5, 6											
3. Group	Chris Higgins	Bonneville Power Administration	x		x		x	x						
Additional Member Additional Organization Region Segment Selection														
1. Tedd	Snodgrass	WECC	1											
2. Rich	Ellison	WECC	1											
4. Group	Emily Pennel	Southwest Power Pool Regional Entity												x
Additional Member Additional Organization Region Segment Selection														
1. John Allen	City Utilities of Springfield	SPP	1, 4											
2. Doug Callison	Grand River Dam Authority	SPP	1, 3, 5											
3. Michelle Corley	Cleco Power	SPP	1, 3, 5											
4. Tony Eddleman	Nebraska Public Power District	MRO	1, 3, 5											
5. Allen Klassen	Westar Energy	SPP	1, 3, 5, 6											
6. Tiffany Lake	Westar Energy	SPP	1, 3, 5, 6											
7. Tara Lightner	Sunflower Electric Power Corporation	SPP	1											
8. Kyle McMenamin	Xcel Energy	SPP	1, 3, 5, 6											
9. Jerry McVey	Sunflower Electric Power Corporation	SPP	1											
10. Terri Pyle	Oklahoma Gas & Electric	SPP	1, 3, 5											
11. Bryan Taggart	Westar Energy	SPP	1, 3, 5, 6											
5. Group	Connie Lowe	Dominion	x		x		x	x						
Additional Member Additional Organization Region Segment Selection														
1. Louis Slade		RFC	5, 6											
2. Mike Garton		NPCC	5, 6											
3. Michael Crowley		SERC	1, 3											
4. Randi Heise		MRO	5, 6											
6. Group	Greg Rowland	Duke Energy	x		x		x	x						
Additional Member Additional Organization Region Segment Selection														
1. Doug Hills	Duke Energy	RFC	1											
2. Ed Ernst	Duke Energy	SERC	3											
3. Dale Goodwine	Duke Energy	SERC	5											
4. Greg Cecil	Duke Energy	RFC	6											

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
7.	Group	Al DiCaprio	ISO/RTO Council Standards Review Committee		x								
Additional Member Additional Organization Region Segment Selection													
1.	Greg Campoli	NYISO	NPCC	2									
2.	Kathleen Goodman	ISO-NE	NPCC	2									
3.	Terry Bilke	MISO	MRO	2									
4.	Steve Myers	ERCOT	ERCOT	2									
5.	Ben Li	IESO	NPCC	2									
6.	Don Weavers	NBSO	NPCC	2									
8.	Group	Wayne Van Liere	SERC OC Standards Review Group			x							
Additional Member Additional Organization Region Segment Selection													
1.	Jeff Harrison	AECI	SERC	1, 3, 5, 6									
2.	Melvin Roland	Southern Co.	SERC	1, 5									
3.	Kelly Casteel	TVA	SERC	1, 3, 5, 6									
4.	Vicky Budreau	Santee Cooper	SERC	1, 3, 5, 6									
5.	Jake Miller	Dynegy	SERC	5									
6.	Jim Case	Entergy	SERC	1, 3, 6									
7.	Brad Young	LGE/KU	SERC	3									
8.	Troy Willis	GA Transmission	SERC	1									
9.	Scott Brame	NCEMCS	SERC	1, 3, 4, 5									
10.	Tim Hattaway	PowerSouth	SERC	1, 5									
11.	Sammy Roberts	Progress Energy	SERC	1, 3, 5, 6									
12.	Marc Butts	Southern Co.	SERC	1, 5									
13.	Todd Lucas	Southern Co.	SERC	1, 5									
14.	Cindy Martin	Southern Co.	SERC	1, 5									
15.	Dan Roethemeyer	Dynegy	SERC	5									
16.	Richard Jackson	Alcoa	SERC	5, 6, 7									
17.	Steve Corbin	SERC	SERC	10									
18.	Andy Burch	EEI	SERC	5									
19.	Robert Thomasson	BREC	SERC	1									
20.	Randy Castello	Southern Co.	SERC	1, 5									
21.	Mike Bryson	PJM	SERC	2									

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
22. John Troha		SERC	SERC 10										
9.	Group	Steve Rueckert	Western Electricity Coordinating Council										x
Additional Member		Additional Organization	Region	Segment Selection									
1. Phil O'Donnell		WECC	WECC 10										
10.	Group	Stephen Berger	PPL Corporation NERC Registered Affiliates	x		x		x	x				
Additional Member		Additional Organization		Region	Segment Selection								
1.	Brenda L. Truhe	PPL Electric Utilities Corporation		RFC	1								
2.	Brent Ingebrigston	LG&E and KU Services Company		SERC	3								
3.	Annette M. Bannon	PPL Generation, LLC on behalf of its Supply NERC Registered Entities		RFC	5								
4.				WECC	5								
5.	Elizabeth A. Davis	PPL EnergyPlus, LLC		MRO	6								
6.				NPCC	6								
7.				SERC	6								
8.				SPP	6								
9.				RFC	6								
10.				WECC	6								
11.	Group	Robert Rhodes	SPP Standards Review Group		x								
Additional Member		Additional Organization		Region	Segment Selection								
1.	John Allen	City Utilities of Springfield		SPP	1, 4								
2.	Doug Callison	Grand River Dam Authority		SPP	1, 3, 5								
3.	Michelle Corley	Cleco Power		SPP	1, 3, 5								
4.	Tony Eddleman	Nebraska Public Power District		MRO	1, 3, 5								
5.	Allen Klassen	Westar Energy		SPP	1, 3, 5, 6								
6.	Tiffany Lake	Westar Energy		SPP	1, 3, 5, 6								
7.	Tara Lightner	Sunflower Electric Power Corporation		SPP	1								
8.	Kyle McMenamin	Xcel Energy		SPP	1, 3, 5, 6								
9.	Jerry McVey	Sunflower Electric Power Corporation		SPP	1								
10.	Terri Pyle	Oklahoma Gas & Electric		SPP	1, 3, 5								
11.	Bryan Taggart	Westar Energy		SPP	1, 3, 5, 6								

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
12.	Group	Jason L. Marshall	ACES Power Marketing Standards Collaborators						x				
Additional Member		Additional Organization		Region		Segment Selection							
1.	Shari Heino	Brazos Electric Power Cooperative	ERCOT	1, 5									
2.	Bob Solomon	Hoosier Energy	RFC	1									
3.	Megan Wagner	Sunflower Electric Power Corporation	SPP	1									
4.	Forrest Brock	Western Farmers Electric Cooperative	SPP	1, 5									
5.	John Shaver	Arizona Electric Power Cooperative	WECC	4, 5									
6.	John Shaver	Southwest Transmission Cooperative, Inc.	WECC	1									
13.	Individual	Jim Eckelkamp	Progress Energy		x		x		x	x			
14.	Individual	DeWayne Scott	Tennessee Valley Authority		x		x		x	x			
15.	Individual	Shammara Hasty	Southern Company		x		x		x	x			
16.	Individual	Scott McGough	Georgia System Operations Corporation				x						
17.	Individual	Michael Falvo	Independent Electricity System Operator			x							
18.	Individual	Mace Hunter	Lakeland Electric		x		x		x				
19.	Individual	Thad Ness	American Electric Power		x		x		x	x			
20.	Individual	RoLynda Shumpert	South Carolina Electric and Gas		x		x		x	x			
21.	Individual	Wayne Sipperly	New York Power Authority		x		x		x	x			
22.	Individual	Terri Pyle	Oklahoma Gas & Electric		x		x		x				
23.	Individual	Patrick Brown	Essential Power, LLC						x				
24.	Individual	Jonathan Appelbaum	The United illuminating Company		x								
25.	Individual	Don Jones	Texas Reliability Entity										x
26.	Individual	Scott Bos	Muscatine Power and Water		x		x		x	x			
27.	Individual	Andrew Z. Pusztai	American Transmission Company		x								
28.	Individual	Jack Stamper	Clark Public Utilities		x								
29.	Individual	Darryl Curtis	Oncor Electric Delivery		x								
30.	Individual	Chris Mattson	Tacoma Power		x		x	x	x	x			

Group/Individual		Commenter	Organization	Registered Ballot Body Segment										
				1	2	3	4	5	6	7	8	9	10	
31.	Individual	Tony Kroskey	Brazos Electric Power Cooperative, Inc.	X										
32.	Individual	Michael Gammon	Kansas City Power & Light	X		X		X	X					

1. The SDT has altered Requirement R1.2 to apply solely to Transmission Operators and transmission information, while creating a new Requirement R1.3 to apply solely to Balancing Authorities and generation information. Do you agree with these changes? This includes accompanying Measures, data retention, and VSLs. If not, please provide a detailed explanation and suggested changes.

Summary Consideration: The SDT reminds the industry that it was working under the constraints of the rapid revision project and that only those items authorized in the rapid revision project SAR can be changed.

The SDT would also like to point out that some of the comments made here are addressed in Project 2007-03, which dealt with clarifying requirement language and eliminating redundancy in the TOP standards. This project has been approved by the NERC Board of Trustees.

Several commenters pointed to a redundancy in Requirement R1.3. The SDT agrees with these comments and has made the clarifying change needed to remove this redundancy.

R1.3 Each Balancing Authority shall inform its Reliability Coordinator ~~and its Transmission Operator(s)~~ of all generation resources available for use.

Organization	Yes or No	Question 1 Comment
Dominion	No	The splitting of the previous R1.2 into a revised R1.2 and a new R1.3 is a good start but falls short of adding the necessary clarity. Dominion suggests the word “all” be deleted in R1, R1.1, R1.2and R1.3 and that R1 should be linked to R1.1, R1.2 and R1.3 as follows: Each Transmission Operator and Balancing Authority shall know the status of generation and transmission resources available for use “as specified in R1.1, R1.2 and R1.3”. Alternatively, Dominion feels that considerable overlap exists in requirements between R1 of TOP-006-2 and R14, R16 and R17 of TOP-002-2b and R1 can therefore be eliminated.
SERC OC Standards Review Group	No	The splitting of the previous R1.2 into a revised R1.2 and a new R1.3 is a good start but falls short of adding the necessary clarity. We suggest the word “all” be deleted in R1, R1.1, R1.2and R1.3 and that R1 should be linked

Organization	Yes or No	Question 1 Comment
		to R1.1, R1.2 and R1.3 as follows: Each Transmission Operator and Balancing Authority shall know the status of generation and transmission resources available for use “as specified in R1.1, R1.2 and R1.3”. Alternatively, we feel that considerable overlap exists in requirements between R1 of TOP-006-2 and R14, R16 and R17 of TOP-002-2b and R1 can therefore be eliminated.
Tennessee Valley Authority	No	The splitting of the previous R1.2 into a revised R1.2 and a new R1.3 is a good start but falls short of adding the necessary clarity. We suggest the word “all” be deleted in R1, R1.1, R1.2 and R1.3 and that R1 should be linked to R1.1, R1.2 and R1.3 as follows: Each Transmission Operator and Balancing Authority shall know the status of generation and transmission resources available for use “as specified in R1.1, R1.2 and R1.3”. Alternatively, we feel that considerable overlap exists in requirements between R1 of TOP-006-2 and R14, R16 and R17 of TOP-002-2b and R1 can therefore be eliminated.
PPL Corporation NERC Registered Affiliates	No	The splitting of the previous R1.2 into a revised R1.2 and a new R1.3 is a good start but falls short of adding the necessary clarity. The TOP (or GOP) cannot be held responsible for transmission (or generation) resources outside of its area of responsibility (i.e. outside its jurisdiction or not under its control). The revised R1.2 and new R1.3 do not state this distinction and are thus too broad. Suggest R1 be revised to: Each Transmission Operator and Balancing Authority shall know the status of generation and transmission resources available for use as specified in R1.1 and R1.2. Suggest R1.2 be revised to: Each Transmission Operator shall inform the Reliability Coordinator and other affected Transmission Operators of transmission resources under its control which are available for use. Suggest R1.3 be revised to: Each Balancing Authority shall inform its Reliability Coordinator and Transmission Operator of generation resources within its Balancing Authority Area which are available for use.

Response: The scope presented to the SDT under the rapid revision process only authorized changes to Requirements R1.2 and R3.

Organization	Yes or No	Question 1 Comment
No change made.		
Duke Energy	No	<p>(1) R1.2 - The TOP should continue to inform its BA about transmission resources available for use. The Functional Model states that the Transmission Operator “15. Provides Real-time operations information to the Reliability Coordinator and Balancing Authority.” Also, since TOPs can’t determine which other TOPs may be “affected”, we believe the TOP should inform “adjacent” TOPs about transmission resources available for use. Reword R1.2 as follows: “ Each Transmission Operator shall inform its Reliability Coordinator, Balancing Authority and adjacent Transmission Operators of all transmission resources available for use.”</p> <p>(2) M2 - Revise to be consistent with our suggested change to R1.2 above.</p> <p>(3) M5 - Revise to be consistent with our suggested change to R3 below.</p> <p>(4) VSLs for R1.2 and R3 - Revise to be consistent with our suggested changes to R1.2 and R3.</p> <p>Also, the Lower and Severe VSLs for R3 appear to be reversed (i.e. failure to provide “any” information is a more serious violation than a failure to provide “all” information).</p>
<p>Response: In general, the Transmission Operator is responsible for transmission and for reporting transmission information to the Reliability Coordinator. Similarly, the Balancing Authority is responsible for generation and for reporting generation information to the Reliability Coordinator. OASIS is the mechanism for providing transmission information to other parties. The SDT believes that the Transmission Operator will know who the affected Transmission Operators are and that changing the phrase to “adjacent” will force unneeded and unwanted information on some Transmission Operators. No change made.</p> <p>Since the requirement was not changed, there is no corresponding change to the measure.</p> <p>Please see response to Requirement R3 comments.</p> <p>Since the requirement didn’t change, there is no corresponding change to the VSL.</p>		

Organization	Yes or No	Question 1 Comment
Please see response to Requirement R3 comments.		
Lakeland Electric	No	I agree with the changes to R1.2. The new R1.3 is redundant in requiring the BA to inform it's TO of all generator resources available for use when R1.1 requires the GO to inform it's TO of all generator resources available for use. Redundant information would be passing through a third party, the BA.
Western Electricity Coordinating Council	No	1.1 Requires Generator Operator to inform both BA and TOP of Generation Status while 1.3 Requires BA to inform TOP of Generation Status. This is duplicative. IF GOP must inform both TOP and BA there is no need to require BA to inform TOP. Preferable change would be for GOP to only inform BA and require BA to inform TOP. but could also work to have GOP inform both functions and remove requirement for BA to inform TOP from 1.3.
Clark Public Utilities	Yes	R1.3 is confusing to me. My utility is a TOP but not a BA. We have a transmission system which our own personnel operate and we have generation connected to our transmission. Our entire transmission system (with its connected generation) is located within the metering boundaries of one BA. R1.1 states our generator is supposed to notify my utility's TOP organization as well as our BA of its availability. I have no problem with R1.1. R1.3 states the BA is supposed to notify its RC and its TOP. Our BA is also a TOP for its own transmission facilities. Our generator is not attached directly to our BA's transmission facilities but to our transmission facilities. Is R1.3 telling the BA it is supposed to notify it own TOP organization of the generator availability (generator attached to my utility's transmission system)? Chances are the people operating our BA are the same people operating our BA's transmission system so this notification seems kind of pointless. In the alternative, is R1.3 telling the BA it needs to notify the TOP that operates the transmission system the generator is connected to? The generator already did that in R1.1 so this would also seem to be pointless. Does the SDT intend for R1.3 to require the BA to notify its RC and "affected

Organization	Yes or No	Question 1 Comment
		<p>TOPs?" This make a little more sense than the current wording. If this is the intent of the SDT the wording doesn't do it. It seems to me that if per R1.1 the generator notifies it's BA and its TOP and then per R1.3 the BA notifies its RC, everyone has been notified of the generator availability and therefore, R1.3 would not need to include a TOP notification. This issue is not critical to me since it provides a confusing requirement for the BA and my utility is not a BA. Therefore I plan to vote in the affirmative on the draft but the SDT should consider cleaning R1.3 up a bit to make it clear what TOP is supposed to be notified by the BA in R1.3.</p>
<p>Response: The SDT agrees and, in the interest of clarification and lack of duplication, has deleted Transmission Operator.</p> <p>R1.3 Each Balancing Authority shall inform its Reliability Coordinator and its Transmission Operator(s) of all generation resources available for use.</p>		
Brazos Electric Power Cooperative, Inc.	No	Please see the formal comments submitted by ACES Power Marketing.
ACES Power Marketing Standards Collaborators	No	<p>(1) Conceptually, we agree with splitting out the BA and TOP requirements. However, additional changes may be warranted. Since the GOP is already obligated to notify its TOP of all generation resources available for use pursuant to R1.1, does it make sense to obligate the BA to also notify the same TOP of the same information in R1.3?</p> <p>(2) Furthermore, does this requirement work as intended for a situation where a generator is pseudo-tied out to another BA which is becoming increasingly common? The problem is that use of the word "its" in R1.3 with regard to a BA informing "its" TOPs could lead to confusion. As an example, one of our members, Sunflower, has several wind farms in its BA Area that are pseudo-tied out to other BA Areas. Let's say Acme Wind Company is the GOP for a wind farm located in Sunflower's footprint and interconnected to transmission facilities owned and</p>

Organization	Yes or No	Question 1 Comment
		<p>operated by Sunflower. Let’s further assume that the Acme wind farm is pseudo-tied to KCP&L’s BA. If the status of the Acme wind farm changes, they, as GOP, will contact their Host BA (KCP&L) and the Transmission Operator (Sunflower) per R1.1. Requirement 1.3 then requires the KCP&L BA to notify “its Transmission Operator(s)” of all generation resources available for use. Who do they contact about the Acme outage? KCP&L TOP? Sunflower TOP? Both? The word “its” is possessive and implies that the KCP&L BA has a link to certain Transmission Operators. How is that link defined? Is it the TOPs that are directly interconnected to the generation resources that are part of their BA? If that is the case, when would more than one TOP need to be informed of a generator outage - i.e. why does the revised Standard say Transmission Operator(s)?</p> <p>(3) Eliminating the need for the BA to notify the TOP in R1.3 is the cleanest solution. At a minimum, if this requirement is going to remain the wording should be changed to something like “Each BA shall inform ... affected Transmission Operator(s) of all generation resources available for use.” This latter solution would be consistent with R1.2.</p> <p>(4) In R1.3, using the word “its” to describe which RC a BA should inform about the status of generation resources is also confusing. If ACME has another generator in Sunflower’s footprint interconnected to transmission facilities owned and operated by Sunflower that is pseudo-tied to ERCOT BA, they will notify ERCOT of a status change on this generator per R1.1. ERCOT BA would then be required to notify “its” RC which presumably is the ERCOT RC. The RC for the system in which the generator is located (SPP RC) would not be notified. Replacing “its” with “affected” again seems to make more sense.</p> <p>(5) While we understand that the scope of the rapid revision is fairly limited, we believe that it should be expanded to write appropriate VSLs for R1.2 and R1.3. Both requirements escalate non-compliance immediately to a</p>

Organization	Yes or No	Question 1 Comment
		<p>Severe VSL for failure to notify the appropriate parties of all transmission or generation resources available for use regardless of the number of resources. We believe gradated VSLs could be written based on the percentage of resources for which the responsible entity did not notify the appropriate parties.</p>
<p>Response: The SDT agrees and, in the interest of clarification and lack of duplication, has deleted Transmission Operator.</p> <p>R1.3 Each Balancing Authority shall inform its Reliability Coordinator and its Transmission Operator(s) of all generation resources available for use.</p> <p>The indicated change to Requirement R1.3 will alleviate this concern.</p> <p>The indicated change to Requirement R1.3 will alleviate this concern.</p> <p>Pseudo-ties cover generators that exist outside of the Balancing Authority Area. The Generator Operator will report to the Transmission Operator in whose area it is physically connected in. No change made.</p> <p>The VSL for Requirement R1.2 was already approved and the SDT didn't change anything there. The VSL for Requirement R1.3 was copied from the approved VSL for Requirement R1.2. No change made.</p>		
Georgia System Operations Corporation	No	See Comment no. 5
<p>Response: Please see response to comment 5.</p>		
The United Illuminating Company	No	<p>The phrasing for R1 can still be interpreted to apply to both Transmission Operators and Balancing Authorities even with the proposed changes to the sub-requirement. We have seen NERC Compliance apply the requirements at the Requirement level without regard to the subrequirements phrasing. We suggest adding an additional phrase to R1 such that R1 states, Each Transmission Operator and Balancing Authority shall know the status of all generation and transmission resources available for use AS SPECIFIED FURTHER IN THE SUB_REQUIREMENTS. In the alternative, each sub</p>

Organization	Yes or No	Question 1 Comment
		requirement could be relabeled as its own requirement.
<p>Response: The scope presented to the SDT under the rapid revision process only authorized changes to Requirements R1.2 and R3. Furthermore, the suggested wording change does nothing to satisfy the situation cited. By their nature and grammatical definition, sub-requirements are nested under requirements and must be taken into context as part of the requirement. No change made.</p>		
Southern Company	Yes	<p>The GOP is already required to provide information on generating unit availability to the TOP under R1.1. Requiring the BA to also provide this same information to the TOP in R1.3 appears to be unnecessarily redundant.</p> <p>Also, the SDT should consider the redundancy of R1.1 and R1.3 to requirements in other standards that specify information exchange on generating resource availability and capability (e.g., TOP-002-2b, R14.; TOP-003-1, R1.; IRO-010-1a, R3.; etc.)</p>
<p>Response: The SDT agrees and, in the interest of clarification and lack of duplication, has deleted Transmission Operator.</p> <p>R1.3 Each Balancing Authority shall inform its Reliability Coordinator and its Transmission Operator(s) of all generation resources available for use.</p> <p>Such changes are not within scope of this rapid revision project. No change made.</p>		
American Transmission Company	Yes	<p>ATC is encouraged by the action of the SDT in splitting the responsibilities of BAs and TOPs rather than having one requirement for both functions. ATC is further recommending that NERC consider doing this for other Reliability Standards where BAs and TOPs are obligated to same requirements in one requirement, and revise in the same manner.</p>
<p>Response: In order to accomplish this, a Standards Authorization Request (SAR) is needed. The SDT encourages ATC to submit such a request which should include the specific instances where ATC feels such a correction should be made. It should be noted that such changes were within scope of Project 2007-03 and have been made in the Board of Trustees approved changes to the</p>		

Organization	Yes or No	Question 1 Comment
TOP family of standards.		
Muscatine Power and Water	Yes	Thank you
MRO NSRF	Yes	The NSRF agrees, thank you.
Northeast Power Coordinating Council	Yes	
New York Power Authority		NYPA is supporting the comments submitted by the NPCC Regional Standards Committee (RSC).
Bonneville Power Administration	Yes	
Southwest Power Pool Regional Entity	Yes	
ISO/RTO Council Standards Review Committee	Yes	
SPP Standards Review Group	Yes	
Independent Electricity System Operator	Yes	
American Electric Power	Yes	
South Carolina Electric and Gas	Yes	
Oklahoma Gas & Electric	Yes	

Organization	Yes or No	Question 1 Comment
Essential Power, LLC	Yes	
Texas Reliability Entity	Yes	
Oncor Electric Delivery	Yes	
Tacoma Power	Yes	
Kansas City Power & Light	Yes	
Response: Thank you for your support.		

- The SDT has revised Requirement R3 to show that entities need only supply information for equipment they are responsible for and not for others' equipment. Do you agree with this change? If not, please provide a detailed explanation and suggested changes.

Summary Consideration: The SDT reminds the industry that it was working under the constraints of the rapid revision project and that only those items authorized in the rapid revision project SAR can be changed.

The SDT would also like to point out that some of the comments made here are addressed in Project 2007-03 which dealt with clarifying requirement language and eliminating redundancy in the TOP standards. This project has been approved by the NERC Board of Trustees.

Several commenters pointed to a lack of clarity in Requirement R3. The SDT agrees with these comments and has made a clarifying change.

Commenters also pointed to the apparent redundancy in the VSL for Requirement R3. The SDT has made a clarifying change within the constraints of the rapid revision process that will be posted in the VRF/VSL non-binding poll.

R3. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate technical information concerning protective relays ~~for which the entity has responsibility within the Reliability Coordinator Area, the Transmission Operator Area, and the Balancing Authority Area, respectively.~~

<p>R3 VSL</p>	<p>The responsible entity <u>Reliability Coordinator, the Transmission Operator, or the Balancing Authority,</u> failed to provide any <u>some</u> of the appropriate technical information concerning protective relays for which it has responsibility within their respective Reliability Coordinator Area, the Transmission Operator Area, and the Balancing Authority to their operating personnel.</p>	<p>N/A</p>	<p>N/A</p>	<p>The responsible entity <u>Reliability Coordinator, the Transmission Operator, or the Balancing Authority,</u> failed to provide all of the appropriate technical information concerning protective relays for which it has responsibility within their respective Reliability Coordinator Area, the Transmission Operator Area, and the Balancing Authority to their operating personnel.</p>
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Organization	Yes or No	Question 2 Comment
New York Power Authority		NYPA is supporting the comments submitted by the NPCC Regional Standards Committee (RSC).
Northeast Power Coordinating Council	No	The requirement to provide “appropriate technical information” should be revised to require applicable operational information.
Southwest Power Pool Regional Entity	No	"Responsibility" is not the appropriate word in R3 and M5. In R3 and M5, SPP RE recommends stating "...appropriate technical information concerning protective relays in the entity’s footprint. "
<p>Response: The SDT does not see any additional clarification with the suggested wording change of ‘appropriate’ to ‘applicable’. No change made.</p> <p>The SDT has clarified the wording of the requirement.</p> <p>R3. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate technical information concerning protective relays for which the entity has responsibility within the Reliability Coordinator Area, the Transmission Operator Area, and the Balancing Authority Area, respectively.</p>		
Dominion	No	The R3 revision is an improvement but is still too broad as “appropriate technical information” could mean the detailed specifications of a relay or what protective/operating functions it performs. Operating personnel need to know the purpose and function of relays but not the internal workings of the relay (i.e. what the relay does, not how it does it).Dominion believes that the language in R3 is duplicated in Standard PRC-001, R1; therefore, R3 can be eliminated - if not, it should be rewritten as follows:R3: Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate information concerning the functions of protective relays for which the entity has responsibility.

Organization	Yes or No	Question 2 Comment
SERC OC Standards Review Group	No	The R3 revision is an improvement but is still too broad as “appropriate technical information” could mean the detailed specifications of a relay or what protective/operating functions it performs. Operating personnel need to know the purpose and function of relays but not the internal workings of the relay (i.e. what the relay does, not how it does it).We also believe that the language in R3 is duplicated in Standard PRC-001, R1; therefore, R3 can be eliminated - if not, it should be rewritten as follows:R3: Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate information concerning the functions of protective relays for which the entity has responsibility.
PPL Corporation NERC Registered Affiliates	No	The R3 revision is an improvement but is still too broad as “appropriate technical information” could mean the detailed specifications of a relay or what protective/operating functions it performs. Operating personnel need to know the purpose and function of relays but not the internal workings of the relay (i.e. what the relay does not how it does it).Suggested language:R3: Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide System Operators with appropriate information concerning the functions of protective relays to allow such personnel to perform their real-time operating duties on protective relays for which the entity has responsibility.
Tennessee Valley Authority	No	The R3 revision is an improvement but is still too broad as “appropriate technical information” could mean the detailed specifications of a relay or what protective/operating functions it performs. Operating personnel need to know the purpose and function of relays but not the internal workings of the relay (i.e. what the relay does, not how it does it).We also believe that the language in R3 is duplicated in Standard PRC-001, R1; therefore, R3 can be eliminated - if not, it should be rewritten as follows:R3: Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate information concerning the functions of protective relays for which the entity has responsibility.

Organization	Yes or No	Question 2 Comment
Duke Energy	No	<p>PRC-001-2 Requirement R1 states “Each Transmission Operator, Balancing Authority, and Generator Operator shall be familiar with the purpose and limitations of protection system schemes applied in its area. [Violation Risk factor: High][Time Horizon: Operations Planning, Same-day Operations, Real-time Operations] . We believe that this requirement is redundant with TOP-006-3 except for the RC, so we suggest that R3 be rewritten to apply only to the RC. Since the phrases “its operating personnel” and “appropriate technical information” lack clarity needed for effective compliance, we propose that the rewrite should use wording similar to PRC-001-2 R1, as follows: “Each Reliability Coordinator shall be familiar with the purpose and limitations of protection system schemes applied in its area.” Alternatively, since PRC-001-2 is now being revised to include just R1, TOP-006-3 could be revised to include the RC, TOP, BA and GOP, and PRC-001-2 could then be retired.</p>
<p>Response: The scope of the rapid revision process provided to the SDT focused solely on the issue of the information to be provided within the scope of TOP-006-3, Requirement R3, and does not provide the latitude suggested in the comments. No change made.</p>		
ISO/RTO Council Standards Review Committee	No	<p>This requirement applies to RC, TOP and BA, and these entities have no responsibilities for the design or proper operation of the protective relays. These entities are responsible for meeting their respective, applicable standard requirements. Some of the tasks these entities perform may require an understanding of the protective relays, and this is the information that needs to be provided to the operating personnel. We therefore suggest the following alternative language to R3: R3. Each RC, TOP, and BA shall provide its operating personnel with technical information concerning protective relays that is related to the respective entity’s responsibility for meeting NERC standards.</p>
<p>Response: The SDT agrees with the interpretation of the nature of the requirement but does not believe that any additional clarity is supplied by the suggested wording. However, the SDT has made clarifying changes based on your comment and the comments of others.</p> <p>R3. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with</p>		

Organization	Yes or No	Question 2 Comment
<p>appropriate technical information concerning protective relays for which the entity has responsibility <u>within the Reliability Coordinator Area, the Transmission Operator Area, and the Balancing Authority Area, respectively.</u></p>		
The United Illuminating Company	No	<p>UI agrees with the concept but disagrees with the phrasing, for which the entity has responsibility. Responsibility to do what? Responsibility to operate or responsibility to build, or responsibility to maintain etc. Was the intent to provide operating personnel information of protection systems deployed in the operating area which impacts the functions the Entity registered for.</p>
Western Electricity Coordinating Council	No	<p>Change does not provide the clarity that is desired. This would require determining “responsibility” for protection systems between RC and TOP. In its role as RC with a wide area view what is its responsibility for a protection system as opposed to the TOP. Within a TOP/BA footprint what Protection system “responsibility” is split between these two functions. A BA should be as interested in Generator Protection systems as any Transmission Protection systems. Do not believe this change is required as R3 already identified the word “appropriate” technical information.</p>
<p>Response: The SDT has clarified the wording of the requirement.</p> <p>R3. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate technical information concerning protective relays for which the entity has responsibility <u>within the Reliability Coordinator Area, the Transmission Operator Area, and the Balancing Authority Area, respectively.</u></p>		
Georgia System Operations Corporation	No	See Comment no. 5
<p>Response: Please see response to comment 5.</p>		
Texas Reliability Entity	No	<p>Responsibility is one aspect to consider but impact to the area of the responsible entities in question is as important to consider. With the proposed wording it appears that Reliability Coordinators and Balancing Authorities, in general, will not provide any technical information to their personnel concerning protective relays. Determining</p>

Organization	Yes or No	Question 2 Comment			
		<p>the extent of “responsibility” as used here is ambiguous and difficult to determine. Does an SPS owned by a Generator Owner, Transmission Owner, or Distribution Provider meet the intent of the “responsibility” phrase for the Reliability Coordinator and Transmission Operator? Suggest changing the wording to “Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate technical information concerning protective relays WITHIN OR IMPACTING THEIR AREA(S).”</p> <p>The VSLs for R3 seem inappropriate in that a Lower VSL is applicable if the responsible entity failed to provide “any” appropriate technical information yet a Severe VSL is applicable if the responsible entity failed to provide “all” appropriate technical information. We suggest you revise this to use less ambiguous terminology.</p>			
<p>Response: The SDT has clarified the wording of the requirement.</p> <p>R3. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate technical information concerning protective relays for which the entity has responsibility within the Reliability Coordinator Area, the Transmission Operator Area, and the Balancing Authority Area, respectively.</p> <p>Under the scope of the rapid revision process, the SDT is limited in what it can do with regard to previously approved wording. The SDT has made a clarifying change to the wording to the extent feasible within these constraints.</p>					
R3 VSL		<p>The responsible entity <u>Reliability Coordinator, the Transmission Operator, or the Balancing Authority,</u> failed to provide any <u>some</u> of the appropriate technical information</p>	N/A	N/A	<p>The responsible entity <u>Reliability Coordinator, the Transmission Operator, or the Balancing Authority,</u> failed to provide all of the appropriate technical information concerning protective</p>

Organization	Yes or No	Question 2 Comment
	<p>concerning protective relays for which it has responsibility within <u>their respective Reliability Coordinator Area, the Transmission Operator Area, and the Balancing Authority</u> to their operating personnel.</p>	<p>relays for which it has responsibility within <u>their respective Reliability Coordinator Area, the Transmission Operator Area, and the Balancing Authority</u> to their operating personnel.</p>
Brazos Electric Power Cooperative, Inc.	No	Please see the formal comments submitted by ACES Power Marketing.
ACES Power Marketing Standards Collaborators	Yes	<p>(1) We conceptually agree with the change but believe a further refinement is necessary. The changes indicate that each RC, TOP and BA is to provide “its operating personnel with appropriate technical information concerning protective relays for which the entity has responsibility”. Because some debate could arise over what responsibility an RC, BA and TOP have, we think that this should be changed to “its operating personnel with appropriate technical information concerning protective relays in its RC Area, TOP Area and BA Area, respectively”. RC Area, TOP Area, and BA Area are defined in the NERC glossary and provided more specificity over which protective relays. Otherwise, an auditor may interpret an RC or TOP having responsibility for protective relays outside of their areas because of the need to maintain a wide area view. Ultimately, the protective relays that each RC, TOP and BA has responsibility for are those in their RC Area, TOP Area and BA Area, respectively.</p> <p>(2) We agree with using “operating personnel” rather than the NERC defined term “System Operator”. We believe that an RC, TOP or BA should be free to have technical experts that are knowledgeable about “appropriate technical information</p>

Organization	Yes or No	Question 2 Comment
		<p>concerning protective relays” and that are not System Operators to support compliance with this requirement. However, we suggest adding a footnote or another explanation to make clear that this is the intent of the drafting team. Otherwise, there will be opportunity for debate in the future over who constitutes “operating personnel”.</p>
<p>Response: The SDT has clarified the wording of the requirement.</p> <p>R3. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate technical information concerning protective relays for which the entity has responsibility within the Reliability Coordinator Area, the Transmission Operator Area, and the Balancing Authority Area, respectively.</p> <p>The SDT agrees. This is what was intended.</p>		
Southern Company	Yes	<p>The SDT effectively addresses the ambiguity in R3 with respect to responsibility. However, we recommend that the SDT clarify what constitutes “appropriate technical information” concerning protective relays.</p>
<p>Response: Under the scope of the rapid revision process, the SDT is limited in what it can do with regard to previously approved wording. No change made.</p>		
American Transmission Company	Yes	<p>Since it is acknowledged there would be double jeopardy with PRC-001 R1 until Project 2007-03 Real-time Operations is approved and TOP-006 R3 is retired, ATC recommends deleting R3 of TOP-006-2 at this time and introducing the Reliability Coordinator as an Applicable Function within PRC-001-2 and include as part of PRC-001-2 R1.</p>
<p>Response: The SDT is not aware of any ‘acknowledgement’ that PRC-001-1.1, Requirement R1 presents a double jeopardy situation with regard to TOP-006-3, Requirement R3. The scope of the rapid revision process provided to the SDT focused solely on the issue of the information to be provided within the scope of TOP-006-3, Requirement R3, and does not provide the latitude suggested in the comment. No change made.</p>		

Organization	Yes or No	Question 2 Comment
Muscatine Power and Water	Yes	Thank you
MRO NSRF	Yes	The NSRF agrees, thank you.
Bonneville Power Administration	Yes	
SPP Standards Review Group	Yes	
Independent Electricity System Operator	Yes	
Lakeland Electric	Yes	
American Electric Power	Yes	
South Carolina Electric and Gas	Yes	
Oklahoma Gas & Electric	Yes	
Essential Power, LLC	Yes	
Clark Public Utilities	Yes	
Oncor Electric Delivery	Yes	
Tacoma Power	Yes	
Kansas City Power & Light	Yes	

Organization	Yes or No	Question 2 Comment
Response: Thank you for your support.		

3. The SDT has supplied suggested Time Horizons for all requirements. Do you agree with these assignments? If not, please provide a detailed explanation and suggested changes.

Summary Consideration: In keeping with the stated purpose of the Reliability Standard, the SDT has changed the Time Horizon for Requirements R3 and R4 to Real-time Operations.

Organization	Yes or No	Question 3 Comment
Brazos Electric Power Cooperative, Inc.	No	Please see the formal comments submitted by ACES Power Marketing.
ACES Power Marketing Standards Collaborators	No	Since the purpose of the standard is “to ensure critical reliability parameters are monitored in real-time”, we question if R4 should have Operations Planning and Same-day Operations time horizons. The purpose of the requirement is to “predict the system’s near-term load pattern”. Given the purpose, we can deduce that this near-term time frame may be intended for the Real-time Operations horizon which covers within one hour of the actual operation.
Response: The SDT agrees and has made the change to the Time Horizon for Requirement R4 so that it only applies to Real-time Operation.		
Georgia System Operations Corporation	No	See Comment no. 5
Response: Please see response to comment 5.		
Kansas City Power & Light	No	The Requirement 3 time horizon is "Operations Planning" but the measure for R3 is written like the time horizon should include "Same-day Operation" and "Real-time Operations". It is recommended to modify R3 to reflect the purpose of the standard which is to monitor system conditions in real time.
Response: The SDT agrees and has made the change to the Time Horizon for Requirement R3 so that it only applies to Real-time		

Organization	Yes or No	Question 3 Comment
Operations.		
Muscatine Power and Water	Yes	Thank you
MRO NSRF	Yes	The NSRF agrees, thank you.
Bonneville Power Administration	Yes	
Southwest Power Pool Regional Entity	Yes	
Dominion	Yes	
Duke Energy	Yes	
ISO/RTO Council Standards Review Committee	Yes	
Western Electricity Coordinating Council	Yes	
SPP Standards Review Group	Yes	
Southern Company	Yes	
Independent Electricity System Operator	Yes	
Lakeland Electric	Yes	

Organization	Yes or No	Question 3 Comment
American Electric Power	Yes	
South Carolina Electric and Gas	Yes	
Oklahoma Gas & Electric	Yes	
Essential Power, LLC	Yes	
The United Illuminating Company	Yes	
Texas Reliability Entity	Yes	
American Transmission Company	Yes	
Clark Public Utilities	Yes	
Oncor Electric Delivery	Yes	
Tacoma Power	Yes	
Northeast Power Coordinating Council	Yes	
New York Power Authority		NYPA is supporting the comments submitted by the NPCC Regional Standards Committee (RSC).
Response: Thank you for your support.		

4. The SDT has supplied an Implementation Plan for this project. Do you agree with this plan? If not, please provide a detailed explanation and suggested changes.

Summary Consideration: The only negative response supplied here has no detailed explanation provided and refers to question 5. No changes were made due to comments to this question.

Organization	Yes or No	Question 4 Comment
Georgia System Operations Corporation	No	See Comment no. 5
Response: Please see response to comment 5.		
MRO NSRF	Yes	The NSRF agrees, thank you.
Muscatine Power and Water	Yes	Thank you
Bonneville Power Administration	Yes	
Southwest Power Pool Regional Entity	Yes	
Dominion	Yes	
Duke Energy	Yes	
ISO/RTO Council Standards Review Committee	Yes	
Western Electricity	Yes	

Organization	Yes or No	Question 4 Comment
Coordinating Council		
SPP Standards Review Group	Yes	
Brazos Electric Power Cooperative, Inc.	No	Please see the formal comments submitted by ACES Power Marketing.
ACES Power Marketing Standards Collaborators	Yes	
Southern Company	Yes	
Independent Electricity System Operator	Yes	
Lakeland Electric	Yes	
American Electric Power	Yes	
South Carolina Electric and Gas	Yes	
Oklahoma Gas & Electric	Yes	
Essential Power, LLC	Yes	
The United Illuminating Company	Yes	
American Transmission Company	Yes	

Organization	Yes or No	Question 4 Comment
Clark Public Utilities	Yes	
Oncor Electric Delivery	Yes	
Tacoma Power	Yes	
Kansas City Power & Light	Yes	
Northeast Power Coordinating Council	Yes	
New York Power Authority		NYPA is supporting the comments submitted by the NPCC Regional Standards Committee (RSC).
Response: Thank you for your support.		

5. If you have any other comments on this Standard that you haven't already mentioned above, please provide them here keeping in mind the limited scope of this rapid development project:

Summary Consideration: The SDT reminds the industry that it was working under the constraints of the rapid revision project and that only those items authorized in the rapid revision project SAR can be changed.

The SDT would also like to point out that some of the comments made here are addressed in Project 2007-03, which dealt with clarifying requirement language and eliminating redundancy in the TOP standards. This project has been approved by the NERC Board of Trustees.

No new changes were made due to comments to this question.

Organization	Yes or No	Question 5 Comment
Bonneville Power Administration		BPA thanks you for the opportunity to comment on the Rapid Revision of TOP-006 and supports the standard as written with no other comments or concerns.
Response: Thank you for your support.		
New York Power Authority		NYPA is supporting the comments submitted by the NPCC Regional Standards Committee (RSC).
Northeast Power Coordinating Council		CAN-0026 dated Dec. 9, 2011 should be withdrawn because it expanded the scope to include protective relays regardless of ownership or maintenance responsibility that may impact the entity.
Response: CANs are reviewed periodically and appropriate actions, such as withdrawal, are made as new standards and requirements go into effect.		
Kansas City Power & Light		Clarifying R3 for equipment an entity is responsible for was successfully completed. However, the introducion of the measure has confused the intent for R3. Suggest

Organization	Yes or No	Question 5 Comment
		<p>modifying R3 to make it clear this is for operator awareness of real-time operating conditions:Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate technical information concerning a loss or compromise of functional operation of protective relays for which the entity has responsibility.</p>
<p>Response: The SDT has made a clarifying change to the wording.</p> <p>R3. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide its operating personnel with appropriate technical information concerning protective relays for which the entity has responsibility within the Reliability Coordinator Area, the Transmission Operator Area, and the Balancing Authority Area, respectively.</p>		
<p>Dominion</p>		<p>Dominion suggests in M3 where “Transmission Operators” is referenced this be changed to read as “Transmission Operator(s)”.</p>
<p>Response: The SDT believes that the two wordings are identical and, thus, no change is needed.</p>		
<p>Western Electricity Coordinating Council</p>		<p>In 1.1 the GO is required to inform its Host BA of all generation resources available for use, and in 1.3 the BA is required to inform its RC and TOPs of all generation resources available for use. Is there any need for other BAs to be informed of generation resources available for use?</p>
<p>Response: The SDT agrees and, in the interest of clarification and lack of duplication, has deleted Transmission Operator.</p> <p>R1.3 Each Balancing Authority shall inform its Reliability Coordinator and its Transmission Operator(s) of all generation resources available for use.</p>		
<p>MRO NSRF</p>		<p>In the Table of Compliance Elements under the R3 row, it appears the criteria for Lower VSL and Severe VSL are the same. Currently in the Lower VSL column, it states the responsible entity failed to provide any of the information; and, in the severe, it states the responsible entity failed to provide all of the information. If an entity fails to provide any of the information, there is a perception they can’t provide any of the</p>

Organization	Yes or No	Question 5 Comment			
		information at all, which is very similar to failing to provide all. Recommend the word “any” be changed to “some” in the Lower VSL column.			
Muscatine Power and Water		MPW would like to point out that in the Table of Compliance Elements under the R3 row, it appears the criteria for Lower VSL and Severe VSL are the same. Currently in the Lower VSL column, it states the responsible entity failed to provide any of the information; and, in the severe, it states the responsible entity failed to provide all of the information. If an entity fails to provide any of the information, there is a perception they can’t provide any of the information at all, which is very similar to failing to provide all. MPW recommends the word “any” be changed to “some” in the Lower VSL column.			
<p>Response: Under the scope of the rapid revision process, the SDT is limited in what it can do with regard to previously approved wording. The SDT has made a clarifying change to the wording to the extent feasible within these constraints.</p>					
R3 VSL		<p>The responsible entity-Reliability Coordinator, the Transmission Operator, or the Balancing Authority, failed to provide anysome of the appropriate technical information concerning protective relays for which it has responsibility-within their respective Reliability Coordinator Area, the</p>	N/A	N/A	<p>The responsible entity-Reliability Coordinator, the Transmission Operator, or the Balancing Authority, failed to provide all of the appropriate technical information concerning protective relays for which it has responsibility-within their respective Reliability Coordinator Area, the Transmission</p>

Organization	Yes or No	Question 5 Comment
	<p><u>Transmission Operator Area, and the Balancing Authority</u> to their operating personnel.</p>	<p><u>Operator Area, and the Balancing Authority</u> to their operating personnel.</p>
Progress Energy		PGN supports the comments submitted by Duke
<p>Response: Please see responses provided to Duke comments in questions 1 – 4.</p>		
Oklahoma Gas & Electric		<p>Regarding R3 and M3, it might be appropriate to provide more information on what is considered "appropriate technical information". Can we assume this is related to the requirements in the PRC-001 standard?</p>
<p>Response: Under the scope of the rapid revision process, the SDT is limited in what it can do with regard to previously approved wording. No change made.</p>		
Georgia System Operations Corporation		<p>The industry and the NERC Board have already approved retiring TOP-006. TOP-001 through TOP-006 are going to be replaced with new versions of TOP-001 through TOP-003. The new versions have already been filed with FERC and are pending FERC's approval. No additional time should be spent on this interpretation for TOP-006 by NERC or by the industry. This project should be closed.</p>
<p>Response: The new versions of TOP-001 through TOP-003 have been approved by the Board of Trustees, but have not yet been filed with FERC due to coordination issues with other projects. Once filed, FERC is under no time deadline to respond to the filing. In addition, Project 2007-03 has a 24-month implementation time frame. Therefore, the Standards Committee authorized the rapid revision project commented on here. No change made.</p>		
PPL Corporation NERC Registered Affiliates		<p>The SDT has indicated that some language has been added “bring the standard up to the current boiler plate wording approved by the Standards Committee,” specifically in section A.5. (Proposed) Effective Date. It is not clear by what means the Standards</p>

Organization	Yes or No	Question 5 Comment			
		<p>Committee has developed or instructed the SDT to implement what has been indicated as “boiler plate” language. The SC has a document entitled Drafting Team Guidelines that does include “default language” to be used in developing standards. The SDT should develop standards based upon the SC approved document entitled Drafting Team Guidelines.</p> <p>If suggested language provided in comments 1 and 2 are adopted, Measures for R1, R1.2, R1.3 and R3 would need to be revised to be consistent with the revised language.</p> <p>The VSLs for R3 seem to be reversed (i.e. failure to provide any info should be Severe and failure to provide all info should be Lower).</p>			
<p>Response: The SDT did provide the default language. No change made.</p> <p>Measures have been updated as needed for changes to the requirements.</p> <p>Under the scope of the rapid revision process, the SDT is limited in what it can do with regard to previously approved wording. The SDT has made a clarifying change to the wording to the extent feasible within these constraints.</p>					
R3 VSL		<p>The responsible entity-Reliability Coordinator, the Transmission Operator, or the Balancing Authority, failed to provide anysome of the appropriate technical information concerning protective relays for which it has responsibility-within</p>	N/A	N/A	<p>The responsible entity-Reliability Coordinator, the Transmission Operator, or the Balancing Authority, failed to provide all of the appropriate technical information concerning protective relays for which it has responsibility-within <u>their respective</u></p>

Organization	Yes or No	Question 5 Comment		
	<p><u>their respective Reliability Coordinator Area, the Transmission Operator Area, and the Balancing Authority to their operating personnel.</u></p>			<p><u>Reliability Coordinator Area, the Transmission Operator Area, and the Balancing Authority to their operating personnel.</u></p>
<p>SERC OC Standards Review Group</p>		<p>The SDT has indicated that some language has been added “bring the standard up to the current boiler plate wording approved by the Standards Committee”, specifically in section A.5. (Proposed) Effective Date. It is not clear by what means the Standards Committee has developed or instructed the SDT to implement what has been indicated as “boiler plate” language. The SC has a document entitled Drafting Team Guidelines that does include “default language” to be used in developing standards. The SDT should develop standards based upon the SC approved document entitled Drafting Team Guidelines.</p> <p>The VSLs for R3 seem to be reversed (ie. failure to provide any info should be Severe and failure to provide all info should be Lower). This appears to have been in error since the initial version.</p>		
<p>Tennessee Valley Authority</p>		<p>The SDT has indicated that some language has been added “bring the standard up to the current boiler plate wording approved by the Standards Committee”, specifically in section A.5. (Proposed) Effective Date. It is not clear by what means the Standards Committee has developed or instructed the SDT to implement what has been indicated as “boiler plate” language. The SC has a document entitled Drafting Team Guidelines that does include “default language” to be used in developing standards. The SDT should develop standards based upon the SC approved document entitled Drafting Team Guidelines.</p> <p>The VSLs for R3 seem to be reversed (ie. failure to provide any info should be Severe</p>		

Organization	Yes or No	Question 5 Comment			
		and failure to provide all info should be Lower). This appears to have been in error since the initial version.			
<p>Response: The SDT did provide the default language. No change made.</p> <p>-Under the scope of the rapid revision process, the SDT is limited in what it can do with regard to previously approved wording. The SDT has made a clarifying change to the wording to the extent feasible within these constraints.</p>					
R3 VSL		<p>The responsible entity-Reliability Coordinator, the Transmission Operator, or the Balancing Authority, failed to provide anysome of the appropriate technical information concerning protective relays for which it has responsibility within their respective Reliability Coordinator Area, the Transmission Operator Area, and the Balancing Authority to their operating personnel.</p>	N/A	N/A	<p>The responsible entity-Reliability Coordinator, the Transmission Operator, or the Balancing Authority, failed to provide all of the appropriate technical information concerning protective relays for which it has responsibility within their respective Reliability Coordinator Area, the Transmission Operator Area, and the Balancing Authority to their operating personnel.</p>
Texas Reliability Entity		There is not a Measurement for Requirement 6.			

Organization	Yes or No	Question 5 Comment
		Should “Complaint” be added in the “Compliance Monitoring and Assessment Processes” section?
<p>Response: It is not within the scope of the SDT to supply a measurement for Requirement R6 under the rapid revision process. No change made.</p> <p>‘Complaint’ is already included in that section. No change made.</p>		
SPP Standards Review Group		<p>While we like what the SDT has done in providing clarification in R1.2, 1.3 and 3, we feel there are other issues that need to be addressed in Requirement 3. While the SDT is working on Requirement 3, it is an excellent time to go ahead and address these concerns. We have listed them below. Recognizing that these issues may be beyond the scope of the SAR in responding to the request for clarification from FMPP, these items are worthy of consideration. We feel that while a team is assembled to address other issues in the standard, that these specific issues should also be reviewed as well. The VSLs for R3 appear to need some work. The lack of providing ‘any’ protective relay information in the Low VSL is actually worse than not providing ‘all’ the protective relay information in the Severe VSL. We suggest replacing ‘any’ in the Low VSL with ‘some’.The use of the term operating personnel gives us concern in determining what is the scope of that audience. Typically, auditors look at System Operators as being that group to which the information is addressed. However, on occasion, an auditor will include others in that category such as plant operators, field personnel, etc. We need clarification on exactly what is the scope of operating personnel. If it is intended to be only the System Operators, that is what the requirement should say. If not, we need to understand what is the breadth of personnel to include. We also have concerns about the potential for expanding the obligations of System Operators to inform others rather than being the target of that training/information. This is based upon the use of operator logs and voice recordings as evidence that the dissemination of information has actually taken place. We would also ask the SDT if they could clarify that the information provided in R3 is training information and not real-time operating information regarding serviceability of</p>

Organization	Yes or No	Question 5 Comment
		<p>protective relay schemes. Additionally, we have concerns regarding the scope of the technical information called for in the requirement, especially with regards to what is 'appropriate'. The SDT's interpretation of and our interpretation of what is appropriate may be different. We suggest that the SDT eliminate the ambiguity and provide a defined scope of what information should be included.</p>
<p>Response: SPP is correct that the indicated items are not within the scope provided to the SDT under the rapid revision process. Such changes can only be undertaken through the submittal of a SAR addressing the specific items, and the SDT encourages SPP to pursue these changes in such a manner. No change made.</p>		

END OF REPORT