

## Comment Report

**Project Name:** 2018 Periodic Review Standing Review Team - Standards Grading  
Comment Period Start Date: 5/14/2018  
Comment Period End Date: 6/28/2018  
Associated Ballots:

There were 15 sets of responses, including comments from approximately 64 different people from approximately 44 companies representing 7 of the Industry Segments as shown in the table on the following pages.

## Questions

1. For CIP-014-2, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
2. For COM-002-4, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
3. For FAC-003-4, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
4. For FAC-013-2, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
5. For IRO-006-5, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
6. For MOD-020-0, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
7. For MOD-025-2, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
8. For MOD-026-1, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
9. For MOD-027-1, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
10. For MOD-028-2, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.
11. Two Periodic Reviews are planned for 2019 from the following eligible standards and standards families: CIP-014-2, COM-002-4, FAC-003-4, FAC-013-2, IRO-006-5, MOD-020-0, MOD-025-2, MOD-026-1, MOD-027-1, and MOD-028-2. Based on the ongoing efforts of the SRT, which standards and standards families should have the highest priority for review in 2019? Please explain your response.

**12. Please provide any additional comments here, on improving the standards grading process, the SRT's approach to standards grading, or any other input you believe would be helpful in instructing the SRT's final grading.**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Southwest Power Pool, Inc. (RTO)	Charles Yeung	2	SPP RE	SRC	Charles Yeung	SPP	2	SPP RE
					Ben Li	IESO	2	NPCC
					Greg Campoli	NYISO	2	NPCC
					Lori Spence	MISO	2	MRO
					Mark Holman	PJM	2	RF
					Matt Goldberg	ISONE	1	NPCC
					Ali Miremadi	CAISO	1	WECC
					Nathan Bigbee	ERCOT	1	Texas RE
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hills	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
MRO	Dana Klem	1,2,3,4,5,6	MRO	MRO NSRF	Joseph DePoorter	Madison Gas & Electric	3,4,5,6	MRO
					Larry Heckert	Alliant Energy	4	MRO
					Amy Casucelli	Xcel Energy	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jodi Jensen	Western Area Power Administration	1,6	MRO
					Kayleigh Wilkerson	Lincoln Electric System	1,3,5,6	MRO
					Mahmood Safi	Omaha Public Power District	1,3,5,6	MRO
					Brad Parret	Minnesota Power	1,5	MRO
					Terry Harbour	MidAmerican Energy Company	1,3	MRO
					Tom Breene	Wisconsin Public Service Corporation	3,5,6	MRO

					Jeremy Voll	Basin Electric Power Cooperative	1	MRO
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Mike Morrow	Midcontinent ISO	2	MRO
Seattle City Light	Ginette Lacasse	1,3,4,5,6	WECC	Seattle City Light Ballot Body	Pawel Krupa	Seattle City Light	1	WECC
					Hao Li	Seattle City Light	4	WECC
					Bud (Charles) Freeman	Seattle City Light	6	WECC
					Mike Haynes	Seattle City Light	5	WECC
					Michael Watkins	Seattle City Light	1,4	WECC
					Faz Kasraie	Seattle City Light	5	WECC
					John Clark	Seattle City Light	6	WECC
					Tuan Tran	Seattle City Light	3	WECC
					Laurrie Hammack	Seattle City Light	3	WECC
					Southern Company - Southern Company Services, Inc.	Marsha Morgan	1,3,5,7	SERC
Jennifer Sykes	Southern Company Generation and Energy Marketing	6	SERC					
R Scott Moore	Alabama Power Company	3	SERC					
William Shultz	Southern Company Generation	5	SERC					
Southwest Power Pool, Inc. (RTO)	Matthew Harward	2	MRO	SPP Standards Review Group	Matthew Harward	Southwest Power Pool, Inc.	2	MRO

					Shannon Mickens	Southwest Power Pool, Inc.	2	MRO
					John Allen	City Utilities of Springfield, Missouri	4	MRO
					Tara Lightner	Sunflower Electric Power Corporation	1	MRO
					Robert Hirschak	Cleco Corporation	6	SERC
PPL - Louisville Gas and Electric Co.	Shelby Wade	3,5,6	RF,SERC	Louisville Gas and Electric Company and Kentucky Utilities Company	Charles Freibert	PPL - Louisville Gas and Electric Co.	3	SERC
					Dan Wilson	PPL - Louisville Gas and Electric Co.	5	SERC
					Linn Oelker	PPL - Louisville Gas and Electric Co.	6	SERC
Lower Colorado River Authority	Teresa Cantwell	1,5		LCRA Compliance	Michael Shaw	LCRA	6	Texas RE
					Dixie Wells	LCRA	5	Texas RE
					Teresa Cantwell	LCRA	1	Texas RE

1. For CIP-014-2, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Chris Scanlon - Exelon - 1,3,5,6

Answer No

Document Name

Comment

Exelon agrees that R.1 could be clarified regarding the required dates for the assessments. We disagree that the applicable entities are mis-identified and that the TO may not have the required expertise to perform the assessment.

RE's comments for R2 that there is no way to ensure the "quality" of the review is addressed in R2.1. Also, the discussion regarding the same entity was extensively discussed during the drafting of the standard and the SDT agreed with this provision. See also R6.

R4 Comment by the RE would open the requirement to an endless, everchanging assessment of emerging threats. The requirement as written is comprehensive in that it requires monitoring of unique characteristics, prior history and warnings as provided by qualified organizations.

R5 . Similar to above, these points were raised when the standard was written. There is no extant evidence that entities have failed to develop "adequate deterrence and detection" causing a threat to the reliability of the BES or that entities are failing to implement security plans in a reasonable time period.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC

Answer No

Document Name

Comment

The matrix used to assess the CIP standards do not ask relevant questions indicative of the intent and purpose of the CIP family of standards. The CIP standards are directed and intended to be around physical and logical security of the electronic devices which manage the data movement and calculations for the overall grid management, performance, and availability. The questions are not suited to measuring the performance or controls of the standards that provide the criteria to establishing these types of security. We believe the grading tool and the use of it should be reviewed and reconsidered in light of ongoing NERC activities. Details provided in our response to Q12.

Likes 0

Dislikes 0

Response

**Terry Bilke - Midcontinent ISO, Inc. - 2****Answer** No**Document Name****Comment**

See our comments on the last question.

Likes 0

Dislikes 0

**Response****Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,7 - SERC, Group Name Southern Company****Answer** No**Document Name****Comment**

CIP-014-2 R1: (1) The 60 calendar months requirement for subsequent risk assessments is sufficient, no additional clarity is needed. (2) The partnership agreement or co-ownership agreement between the two parties at a co-owned facility should determine/govern how the required risk assessment is performed. (3) The specific assessment methodology should be left to the discretion of the Transmission Owner and should not be prescribed because all systems are not the same. R2 clearly leaves the third party verifier with the responsibility to question the analysis, methodology, and findings of the Transmission Owner and to request changes.

CIP-014-2 R2: The current language in the requirement is very clear that the “Transmission Owner shall have an unaffiliated third party verify the risk assessment.” If the Transmission Owner used a third party to perform the initial risk assessment, then that third party would not be “unaffiliated” with the Transmission Owner. In accordance with R2.1 the unaffiliated third party is required to meet predefined qualification criteria. R2 clearly leaves the third party verifier with the responsibility to question the analysis, methodology, and findings of the Transmission Owner and to request changes.

CIP-014-2 R3: The current language in the requirement is clear and there is no need to combine with a different requirement.

CIP-014-2 R4: Additional non-binding resource information in a guidance document could be beneficial.

CIP-014-2 R5: The timeline to implement the physical security enhancements and modifications in the physical security plans are Transmission Owner specific and situation specific. Artificially developing a uniform timeline for the implementation of security plans that are unique to each individual Transmission Owner would be very difficult to implement and could be counterproductive to the objective of greater physical security.

CIP-014-2 R6: The current language in the requirement is clear that the Transmission Owner shall have an unaffiliated third party review. We agree that adding clarification that if the Transmission Owner used a third party to perform the R4 risk and vulnerability evaluation or the R5 development of the physical security plans, then that same third party entity might not be able to perform an objective unaffiliated third party review of the plans they developed for the Transmission Owner.

Likes 0

Dislikes 0

**Response**



**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer** No

**Document Name**

**Comment**

Duke Energy disagrees with making changes to the standard at this time.

Likes 0

Dislikes 0

**Response**

**Teresa Cantwell - Lower Colorado River Authority - 1,5, Group Name LCRA Compliance**

**Answer** Yes

**Document Name**

**Comment**

No comment.

Likes 0

Dislikes 0

**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer** Yes

**Document Name**

**Comment**

(C1) (Q10) Reclamation asserts the standard is clear that the entity conducting the verification is not the same entity that conducted the risk assessment.

(Q1/Q8) Reclamation does not support a prescriptive methodology for the third-party verification of the risk assessment or for adequate deterrence, detection, and response.

(Q1) Reclamation supports consolidation opportunities to avoid duplication and overlap with other standards.

Likes 0

Dislikes 0

**Response**

**Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Allie Gavin - International Transmission Company Holdings Corporation - 1 - MRO,RF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name** Seattle City Light Ballot Body

**Answer**

**Document Name**

**Comment**

City Light supports the findings.

Likes 0

Dislikes 0

**Response**

**Richard Vine - California ISO - 2**

**Answer**

**Document Name**

**Comment**

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

**Response**

**Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name** SPP Standards Review Group

**Answer**

**Document Name**

**Comment**

The SPP Standards Review Group (SSRG) is neutral with regards to grading this standard.

Likes 0

Dislikes 0

**Response**

2. For COM-002-4, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer No

Document Name

Comment

BPA supports moving these requirements to a PER standard. This comment does not apply to a specific tool question as the scoring varied so widely.

Likes 0

Dislikes 0

Response

Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6

Answer No

Document Name

Comment

R1 – Q1: In regards to NERC’s comment; we disagree that R2-R7 create protocols and believe that R1 should continue to stand alone.

Q6: In regards to the PC’s comments, R5, R6, and R7 is equivalent to the intent of “Directive” language and thus re-introducing “Directive” risks additional confusion.

R2- Q1: In regards to the OC’s comment, we disagree with combining this requirement with PER-005. In regards to the RE comments; R4 provides guidance for corrective actions (i.e. remedial training) as written.

R3- C2: In regards to NERC’s comment, we do not agree with including TO and GO as “operating personnel”. If clarification is needed, NERC and Industry should renew the effort to define “operating personnel” as part of the NERC Glossary of Terms.

R4 - C2, Q1, Q2, Q5, Q11: we believe the requirement meets the task and purpose as written.

R5- Q1: R5 is specific to issuance of Operating Instructions during an **Emergency** (analogous to previous “directive” language). Combining with R1 would “dilute” the intent of the requirement.

R6- Q1: R6 is specific to receipt of Operating Instructions during an **Emergency** (analogous to previous "directive" language). Combining with R1 would "dilute" the intent of the requirement.

R7- Q1: R7 is specific to issuance of single party to multiple-party burst Operating Instructions during an **Emergency** (analogous to previous "directive" language). Combining with R1 would "dilute" the intent of the requirement.

Likes 0

Dislikes 0

### Response

**Teresa Cantwell - Lower Colorado River Authority - 1,5, Group Name** LCRA Compliance

**Answer**

No

**Document Name**

### Comment

1.) On the grading sheet, some of the questions need to be re-written or separated to provide clarity in the response. Several of the questions listed actually contain two questions and only have one response. Example: Q1. Should the requirement stand alone as is (or should it be consolidated with other standards)? Only one response was given.

2.) LCRA feels that initial training is adequate and does not require subsequent training on the communications protocols since the purpose of R4 to assess the adherence and effectiveness of the protocols also addresses providing feedback and taking corrective actions if protocols are not followed. LCRA also agrees with transferring all training related requirements within existing Reliability Standards into one training based Reliability Standard.

3.) The purpose of R5 isn't clear. R5 basically re-states requirements listed in the communication protocol, but explicitly states during an emergency. The communications protocol requirements in R1 state they must be used when issuing an Operating Instruction, it doesn't matter if there is an Emergency or not, the protocols must be followed. R5 could just simply state the communications protocols established in R1 must be followed and that would include issuing and receiving during normal and Emergency situations.

4.) Distribution Providers and Generator Operators are not required in R1 to develop communications protocols. If they will not be included in R1, LCRA feels that the requirement for Balancing Authorities and Transmission Operators in R6 can be removed since that would be required under the re-written R5, and just leave the requirement as-is for Distribution Providers and Generator Operators.

5.) Please define "burst Operating Instruction" for those in the industry not familiar with the term.

Likes 0

Dislikes 0

### Response

**Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name** SPP Standards Review Group

**Answer**

No

<b>Document Name</b>	
<b>Comment</b>	
<p>The Standards Efficiency Review is considering this standard for retirement and the SRT may want to delay determination regarding this standard until that process is completed.</p> <p>The SSRG does not support the comment under Q6 that the term “Directives” should be reintroduced in this specific standard. As written, COM-002-4 is intended to be applied to Operating Instructions only; and to add an additional type of instruction for a more critical reliability related instruction may create unintended consequences or ambiguity that may conflict with or diminish the intended purposes. Additionally, do not agree with the proposal to combine R5 with R1 because the specificity of R5 language pertaining to “Operating Instructions during an Emergency” is appropriate for a stand-alone requirement.</p> <p>However, the SSRG does agree:</p> <ul style="list-style-type: none"> <li>Identified ambiguities should be cleaned-up (e.g., NERC comments Q10: 1.1)</li> <li>It’s appropriate to move the R2 training requirement to Reliability Standard PER-005. All training requirements should be comprised in one standard (See OC comment for COM-002-4).</li> </ul>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Terry Bilke - Midcontinent ISO, Inc. - 2</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
See our comments on the last question.	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Chris Scanlon - Exelon - 1,3,5,6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Exelon Generation comment: Exelon does not agree with PC C2 comment that the GOP should be included in the scope of R4. The GOP typically does not own the recorded lines and therefore has no ability to monitor the three-way communication from all parties in a consistent manner unless the	

discussion is broadcast or additional personnel are on the line to monitor the communication. Without ownership of the recorded line there is no way to provide effective, consistent feedback as expected in Measure M4. If a GOP failed to meet the requirements of three-way communications associated with issuance of an Operating Instruction during an emergency, that would fall within the scope of Requirement R6 which is currently applicable to the GOP.

Likes 0

Dislikes 0

### Response

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer**

Yes

**Document Name**

**Comment**

(C1) (Q6) Reclamation supports reintroduction of the term Directive to further distinguish situations that are a higher level of importance.

(Q1) Reclamation supports consolidating and streamlining the requirements within COM-002-4.

Likes 0

Dislikes 0

### Response

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

### Response

**Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,7 - SERC, Group Name Southern Company**

**Answer**

Yes

**Document Name**

**Comment**



Likes 0

Dislikes 0

**Response**

**Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC**

**Answer**

**Document Name**

**Comment**

SRC chose not to respond to this question.

Likes 0

Dislikes 0

**Response**

**Richard Vine - California ISO - 2**

**Answer**

**Document Name**

**Comment**

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

**Response**



3. For FAC-003-4, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

**Terry Bilke - Midcontinent ISO, Inc. - 2**

**Answer** No

**Document Name**

**Comment**

See our comments on the last question.

Likes 0

Dislikes 0

**Response**

**Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,7 - SERC, Group Name Southern Company**

**Answer** No

**Document Name**

**Comment**

Regarding the NERC C3 response, "potential to consider vegetation outside the right-of-way", caution should be given as to this consideration seeing the regulator cannot require entities to maintain where no legal rights exist. Thus, Southern Company recommends adjusting the scoring higher for FAC-003-4 R1 & R2 where the above subject is in question.

Likes 0

Dislikes 0

**Response**

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer** No

**Document Name**

**Comment**

R1: Duke Energy disagrees with considering vegetation outside the right-of way. Events that occur outside the right of way are random, not sequential in nature, and do not lead to cascading outages. Also, potential legal rights and siting issues could arise if outside of right of way is considered.

R1: Duke Energy agrees with the RE rep's comment regarding the need to revisit the issue of IROL(s) in light of the proposed changes to FAC-014 and the fact that the RC function can also declare IROL(s).

R2: Disagree with the assertion that Sustained Outage is unclear. We believe the term is clear and specific to how the system is operated currently.

R4: We disagree with consolidating with R1. R4 is a procedural based requirement as opposed to the other requirements which are performance based. Also, we are unsure that there is a reasonable alternative to the phrase "without any intentional time delay".

R5: Disagree with the idea of consolidating with other Requirements. This requirement could be moved to guideline, as we believe that the guidance is still valuable to industry.

R6: Duke Energy believes this requirement could be moved to a guideline.

R7: Duke Energy believes this requirement could be moved to a guideline. This is still needed for guidance for industry. This is also used by industry for consistency in non-NERC programs.

Likes 0

Dislikes 0

### Response

**Teresa Cantwell - Lower Colorado River Authority - 1,5, Group Name LCRA Compliance**

**Answer**

Yes

**Document Name**

**Comment**

No comment.

Likes 0

Dislikes 0

### Response

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer**

Yes

**Document Name**

**Comment**

(Q1) Reclamation supports consolidating and streamlining the requirements within FAC-003-4.

Likes 0

Dislikes 0

### Response

**Chris Scanlon - Exelon - 1,3,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Richard Vine - California ISO - 2**

**Answer**

**Document Name**

**Comment**

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

**Response**

**Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC**

**Answer**

**Document Name**

**Comment**

SRC chose not to respond to this question.

Likes 0

Dislikes 0

**Response**

**Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name SPP Standards Review Group**

**Answer**

**Document Name**

**Comment**

The SSRG is neutral with regards to grading this standard. However, the Standards Efficiency Review is considering this standard for retirement and the SRT may want to delay determination regarding this standard until that process is completed.

Likes 0

Dislikes 0

**Response**

4. For FAC-013-2, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

**Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name** SPP Standards Review Group

**Answer** No

**Document Name**

**Comment**

The SSRG agrees with the Standard Efficiency Review recommendation to retire standard based on the justification that this standard is primarily administrative in nature and does not require specific performance metrics or coordination among functional entities or provide reliability benefits not captured by other standards (See Combined\_SER\_SAR\_final\_06072018).

Likes 0

Dislikes 0

**Response**

**Terry Bilke - Midcontinent ISO, Inc. - 2**

**Answer** No

**Document Name**

**Comment**

See our comments on the last question.

Likes 0

Dislikes 0

**Response**

**Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name** Seattle City Light Ballot Body

**Answer** No

**Document Name**

**Comment**

Grading Standards Form - Question C2: The City Light SME does not believe this standard should be applicable to every Planning Coordinator. PCs that are not also TSPs do not have any ATC paths to study, which makes it less clear what transfers could be usefully studied.

Grading Standards Form - Questions Q1 & Q13: City Light agrees with the OC's comments that this standard is mostly redundant with TPL-001-4. We can't speak for utilities that are TSPs and have clear transfer paths, but for SCL this standard provides no clear reliability benefit beyond the TPL-001-4 standard. The ability to define your own methodology (per FAC-013 R1) has the potential benefit of allowing utilities to study something useful, but is



more likely to result in doing the bare minimum to meet the standard while providing little if any reliability benefit because the studies are redundant to TPL.

Likes 0

Dislikes 0

**Response**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

M28 - BPA agrees with the NERC OC's assertion that the intent of FAC-013 is met by TPL-001.

Likes 0

Dislikes 0

**Response**

**Teresa Cantwell - Lower Colorado River Authority - 1,5, Group Name LCRA Compliance**

**Answer**

Yes

**Document Name**

**Comment**

Not applicable to LCRA.

Likes 0

Dislikes 0

**Response**

**Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Shelby Wade - PPL - Louisville Gas and Electric Co. - 3,5,6 - SERC, Group Name Louisville Gas and Electric Company and Kentucky Utilities Company**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,7 - SERC, Group Name Southern Company**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
N/A	
Likes 0	
Dislikes 0	
<b>Response</b>	
Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
SRC chose not to respond to this question.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Richard Vine - California ISO - 2	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

**Response**

5. For IRO-006-5, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

**Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name** Seattle City Light Ballot Body

**Answer** No

**Document Name**

**Comment**

The language of requirement R1, IRO-006-5, is properly limited to cross-Interconnection transactions. This is because other standards – the regional standards, IRO-006-EAST-2, IRO-006-TRE-1 and IRO-006-WECC-2 – apply to transactions within each of those Interconnections. If the PC's recommended revision was adopted, the language of requirement R1, IRO-006-5 would overlap and duplicate the regional requirements for following relief procedures within the Interconnections. As a result, NERC should not pursue the PC's recommended revision.

Likes 0

Dislikes 0

**Response**

**Terry Bilke - Midcontinent ISO, Inc. - 2**

**Answer** No

**Document Name**

**Comment**

See our comments on the last question.

Likes 0

Dislikes 0

**Response**

**Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name** SPP Standards Review Group

**Answer** No

**Document Name**

**Comment**

The SSRG doesn't see a need to revise this standard given it specifically applies to interchange events across Interconnection boundaries. The PC response for Q10 is confusing because TLR only exists in the East Interconnection, and where ERCOT and the West Interconnection use different vernacular and processes for interchange events.

Likes 0

Dislikes 0

**Response**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** No

**Document Name**

**Comment**

J30 - NERC states the standard could use more specific terminology. The PC agrees, and specifically recommends deletion of “in another interconnection” from R1. BPA agrees with the PC for deletion of "in another interconnection" from R1. The plain reading of current R1 applies only to TLR requests from responsible entities (RC, BA, TOP) *in another Interconnection* to RCs or BAs in a different interconnection, **and** only requires curtailments of those "transactions that cross an Interconnection boundary."

This language was a turning point for the IRO-006-WECC X 5 year review team. The team felt, at best the IRO-006-5 standard applied between RCs because of the focus is on entities “in another interconnection” and “transactions that cross an interconnection boundary.”

If the suggested language is removed, then the remaining language continues to be focused on only "transactions that cross an interconnection boundary." This still keeps the focus of the standard to be applied between RCs. BPA is not sure that is the result that the PC wanted – that the standard "should apply to all TLRs regardless of interconnection boundaries."

Likes 0

Dislikes 0

**Response**

**Teresa Cantwell - Lower Colorado River Authority - 1,5, Group Name LCRA Compliance**

**Answer** Yes

**Document Name**

**Comment**

No comment.

Likes 0

Dislikes 0

**Response**

**Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response****Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,7 - SERC, Group Name Southern Company****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

**Richard Vine - California ISO - 2**

**Answer**

**Document Name**

**Comment**

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

**Response**

**Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC**

**Answer**

**Document Name**

**Comment**

SRC chose not to respond to this question.

Likes 0

Dislikes 0

**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**



6. For MOD-020-0, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

**Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name** SPP Standards Review Group

**Answer** No

**Document Name**

**Comment**

The SSRG agrees with the Standard Efficiency Review recommendation to retire standard based on the justification that this standard is duplicative of the data provision requirements included in Reliability Standards MOD-31-2 and IRO-010-2 (See Combined\_SER\_SAR\_final\_06072018).

Likes 0

Dislikes 0

**Response**

**Terry Bilke - Midcontinent ISO, Inc. - 2**

**Answer** No

**Document Name**

**Comment**

See our comments on the last question.

Likes 0

Dislikes 0

**Response**

**Teresa Cantwell - Lower Colorado River Authority - 1,5, Group Name** LCRA Compliance

**Answer** Yes

**Document Name**

**Comment**

No comment.

Likes 0

Dislikes 0

**Response**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Shelby Wade - PPL - Louisville Gas and Electric Co. - 3,5,6 - SERC, Group Name Louisville Gas and Electric Company and Kentucky Utilities Company**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,7 - SERC, Group Name Southern Company**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

<b>Response</b>	
<b>Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
SRC chose not to respond to this question.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Richard Vine - California ISO - 2</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee	
Likes 0	
Dislikes 0	
<b>Response</b>	

7. For MOD-025-2, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

**Terry Bilke - Midcontinent ISO, Inc. - 2**

**Answer** No

**Document Name**

**Comment**

See our comments on the last question.

Likes 0

Dislikes 0

**Response**

**Chris Scanlon - Exelon - 1,3,5,6**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Teresa Cantwell - Lower Colorado River Authority - 1,5, Group Name LCRA Compliance**

**Answer** Yes

**Document Name**

**Comment**

No comment.

Likes 0

Dislikes 0

**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer** Yes

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

BPA believes MOD-025-R3 Should have guidelines to ensure GO's provide more detailed P-Q curves with accurate points showing the formulaic equations used on the OEL and UEL segments of which Pmax is held constant. Furthermore, doing so would allow TPs to derive the steady-state Q versus P relationship for the OEL and UEL portions of the curve based on the equations provided. In so doing, TPs will then have a proper use for the MOD-025 reports which they could then enter into the models.

Likes 0

Dislikes 0

**Response**

**Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,7 - SERC, Group Name Southern Company**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Richard Vine - California ISO - 2**

**Answer**

**Document Name**

**Comment**

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

**Response**

**Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC**

**Answer**

**Document Name**

**Comment**

SRC chose not to respond to this question.

Likes 0

Dislikes 0

**Response**

**Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name SPP Standards Review Group**

**Answer**

**Document Name**

**Comment**

The SSRG is neutral with regards to grading this standard. However, the Standards Efficiency Review is considering this standard for modification or consolidation with another standard under Phase 2 of the Standards Efficiency Review project and the SRT may want to delay determination regarding this standard until that process is completed.

Likes 0



Dislikes 0

**Response**

8. For MOD-026-1, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

**Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name SPP Standards Review Group**

**Answer** No

**Document Name**

**Comment**

The Standards Efficiency Review is considering this standard for modification or consolidation with another standard under Phase 2 of the Standards Efficiency Review project and the SRT may want to delay determination regarding this standard until that process is completed. Additionally, with regards to Q10, it would be helpful to clarify in unambiguous terms that the NERC List of Acceptable Models should be utilized by GOs and TPs when responding to information requests.

Likes 0

Dislikes 0

**Response**

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer** No

**Document Name**

**Comment**

R2: Duke Energy disagrees that there is a gap in the standard by leaving out SVCs and STACOMs, and does not believe these should be in the standard as they are not susceptible to the same level of degradation.

Likes 0

Dislikes 0

**Response**

**Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,7 - SERC, Group Name Southern Company**

**Answer** No

**Document Name**

**Comment**

MOD-026-1 R3, R4, R5

Southern Company believes Attachment 1 adequately addresses the time frame. Consequently, we do not agree with the RE's scoring since guidance is provided in the Attachment.

Likes 0

Dislikes 0

### Response

#### Terry Bilke - Midcontinent ISO, Inc. - 2

Answer

No

Document Name

### Comment

See our comments on the last question.

Likes 0

Dislikes 0

### Response

#### Chris Scanlon - Exelon - 1,3,5,6

Answer

No

Document Name

### Comment

Comments: MOD-026 and MOD-027 are formatted similarly, so Exelon agrees that the comment from the RE that the timeframe to submit a verified model is not clear in the Requirement language and that this applies to both MOD-026 and MOD-027.

Related to MOD-027, NERC comments that MOD-027 does not include a "go and fix it requirement" like MOD-026 R5. However, Exelon argues that MOD-026 R5 is somewhat redundant and conflicts with MOD-026 R3. Requirement R3 requires the GO to provide a written response to its Transmission Planner within 90 calendar days of receiving one of the listed items, which includes written comments from the TP that the **model response did not match the recorded response to a transmission system event**. R5 requires the GO to respond to the TP within 90 calendar days following receipt of a technically justified unit request. "Technically justified" is defined as the TP demonstrating that the **simulated unit or plant response does not match the measured unit or plant response**. We think the standard requirements conflict with each other because R3 allows the GO an option to respond to the TP with a technical basis for maintaining the submitted model. However, R5 does not allow the GO the option to maintain the original model parameters and requires the GO to either submit a verification plan or revised model parameters within the 90 calendar days. Exelon believes Requirements R3 and R5 for MOD-026 should be consolidated into one requirement.

Likes 0

Dislikes 0

**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer** Yes

**Document Name**

**Comment**

(C3) Reclamation supports the addition of a schedule (instead of a plan) within which to submit a revised and/or verified model to the TP. Reclamation recommends the new language follow the pattern stated in R4 for providing a written response.

Reclamation also supports moving timeframe requirements from Attachment 1 into the requirement language of the standard.

Likes 0

Dislikes 0

**Response**

**Teresa Cantwell - Lower Colorado River Authority - 1,5, Group Name LCRA Compliance**

**Answer** Yes

**Document Name**

**Comment**

No comment.

Likes 0

Dislikes 0

**Response**

**Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body**

**Answer** Yes

**Document Name**

**Comment**

Our City Light SME agrees with the scoring and findings of the SRT. There are some good comments on the unnecessary differences between 026 and 027.

Likes 0

Dislikes 0

**Response**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC**

**Answer**

**Document Name**

**Comment**

SRC chose not to respond to this question.

Likes 0

Dislikes 0

**Response**

**Richard Vine - California ISO - 2**

**Answer**

**Document Name**

**Comment**

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

**Response**

9. For MOD-027-1, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Chris Scanlon - Exelon - 1,3,5,6

Answer No

Document Name

Comment

See MOD-026

Likes 0

Dislikes 0

Response

Terry Bilke - Midcontinent ISO, Inc. - 2

Answer No

Document Name

Comment

See our comments on the last question.

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,7 - SERC, Group Name Southern Company

Answer No

Document Name

Comment

MOD-027-1 R3, R4

Southern Company believes Attachment 1 adequately addresses the time frame. Consequently, we do not agree with the RE's scoring since guidance is provided in the Attachment.

Likes 0

Dislikes 0

<b>Response</b>	
Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name SPP Standards Review Group	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
The Standards Efficiency Review is considering this standard for modification or consolidation with another standard under Phase 2 of the Standards Efficiency Review project and the SRT may want to delay determination regarding this standard until that process is completed. Additionally, with regards to Q10, it would be helpful to clarify in unambiguous terms that the NERC List of Acceptable Models should be utilized by GOs and TPs when responding to information requests.	
Likes	0
Dislikes	0
<b>Response</b>	
Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Our City Light SME agrees with the scoring and findings of the SRT. There are some good comments on the unnecessary differences between 026 and 027.	
Likes	0
Dislikes	0
<b>Response</b>	
Teresa Cantwell - Lower Colorado River Authority - 1,5, Group Name LCRA Compliance	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
No comment.	
Likes	0
Dislikes	0



**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer** Yes

**Document Name**

**Comment**

(C3) Reclamation supports the addition of a schedule (instead of a plan) within which to submit a revised and/or verified model to the TP. Reclamation recommends the new language follow the pattern stated in R4 for providing a written response.

(Q4) Reclamation also supports moving timeframe requirements from Attachment 1 into the requirement language of the standard.

Likes 0

Dislikes 0

**Response**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

BPA believes having GO's required to perform a model review upon receiving a technically justified request from their TP was never addressed in this requirement. Also, there is a lack of mention of inverter controls, which may lead to the controls not being verified.

Likes 0

Dislikes 0

**Response**

**Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Richard Vine - California ISO - 2**

**Answer**

**Document Name**

**Comment**

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

**Response**

**Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC**

**Answer**

**Document Name**

**Comment**

SRC chose not to respond to this question.

Likes 0

Dislikes 0

**Response**

10. For MOD-028-2, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

**Terry Bilke - Midcontinent ISO, Inc. - 2**

**Answer** No

**Document Name**

**Comment**

See our comments on the last question.

Likes 0

Dislikes 0

**Response**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

BPA agrees with the NERC OC comments on MOD-028-2.

Likes 0

Dislikes 0

**Response**

**Teresa Cantwell - Lower Colorado River Authority - 1,5, Group Name LCRA Compliance**

**Answer** Yes

**Document Name**

**Comment**

No comment.

Likes 0

Dislikes 0

**Response**

**Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,7 - SERC, Group Name Southern Company**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name SPP Standards Review Group**

**Answer**

**Document Name**

**Comment**

The SPP Standards Review Group is neutral with regards to grading this standard. However, the Standards Efficiency Review is considering this standard for retirement and the SRT may want to delay determination regarding this standard until that process is completed.

Likes 0

Dislikes 0

<b>Response</b>	
<b>Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
SRC chose not to respond to this question.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Richard Vine - California ISO - 2</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee	
Likes 0	
Dislikes 0	
<b>Response</b>	

11. Two Periodic Reviews are planned for 2019 from the following eligible standards and standards families: CIP-014-2, COM-002-4, FAC-003-4, FAC-013-2, IRO-006-5, MOD-020-0, MOD-025-2, MOD-026-1, MOD-027-1, and MOD-028-2. Based on the ongoing efforts of the SRT, which standards and standards families should have the highest priority for review in 2019? Please explain your response.

Chris Scanlon - Exelon - 1,3,5,6

Answer

Document Name

Comment

MOD 26, 27. See above comments.

Likes 0

Dislikes 0

Response

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Document Name

Comment

The NSRF recommends that the SRT's review be based on: 1) risk to reliability [or emerging risk]; 2) risk of not understanding a (new) Standard; and 3) risk of non-compliance to an Applicable Entity. We make the following recommendations:

1. CIP-014-2 (1)
2. MOD-026-1 (1, 2)
3. MOD-027-1 (1, 2)
4. MOD-025-2 (1, 2)
5. FAC-013-2 (1)
6. COM-002-4, FAC-003-4, IRO-006-5 MOD-020-0 and MOD-028-2 (3)

Likes 0

Dislikes 0

Response

Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body

Answer



**Document Name**

**Comment**

City Light believes the SRT should focus on any standards not part of the Standards Efficiency Review Project and should coordinate with the SER teams on those standards that they are also reviewing and planning to revise/retire to optimize industry efforts.

Likes 0

Dislikes 0

**Response**

**Richard Vine - California ISO - 2**

**Answer**

**Document Name**

**Comment**

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

**Response**

**Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC**

**Answer**

**Document Name**

**Comment**

SRC chose not to respond to this question.

Likes 0

Dislikes 0

**Response**

**Terry Bilke - Midcontinent ISO, Inc. - 2**

**Answer**

**Document Name**

**Comment**

None. See our answer to the last question.

Likes 0

Dislikes 0

## Response

**Shelby Wade - PPL - Louisville Gas and Electric Co. - 3,5,6 - SERC, Group Name** Louisville Gas and Electric Company and Kentucky Utilities Company

**Answer**

**Document Name**

**Comment**

Louisville Gas and Electric Company and Kentucky Utilities Company (LG&E/KU) recommend 2018-eligible Reliability Standards FAC-013-2 and MOD-020-0 for a periodic review in 2019.

### **FAC-013-2**

LG&E/KU believes Reliability Standard FAC-013-2 should have the highest priority for a periodic review in 2019 and supports the Standards Efficiency Review (SER) Team's justification to retire FAC-013-2. LG&E/KU agrees with the SER Team's comment that in general FAC-013-2 "fails to meet System reliability objectives". In this regard, the SER Team noted, among other things, that:

"The standard does not specify performance metrics or define what acceptable system performance is.

Assessing transfer capability above the 'known commitments for Firm Transmission Service and Interchange' required by TPL-001-4 (R1.1.5), serves a market function as opposed to securing System reliability."

As the SER Team pointed out, most of the standard has already been recommended for retirement - the 2013 NERC Independent Experts Review Project identified R2 and R3 as administrative and recommended them for retirement, and R3 was approved for retirement by FERC in 2014.

LG&E/KU additionally recommends FAC-013-2 for reevaluation because the Transmission Planning required for FERC Order 1000 replaces the need for FAC-013 requirements. The performance of the assessment and methodology provides no reliability benefit to the BES. The reporting requirements entailed by the standard – an annual assessment and responses to regular data requests – provides no reliability benefit while creating a high degree of regulatory burden.

### **MOD-020-0**

LG&E/KU also recommends Reliability Standard MOD-020-0 for review in 2019 and supports the Standards Efficiency Review (SER) Team's justification for retiring MOD-020-0: "This requirement is duplicative of the data provision requirements included in Reliability Standards MOD-031-2 and IRO-010-2."

As further explained by the SERT Team:

"MOD-020-0 R1 requires the Load-Serving Entity, Transmission Planner, and Resource Planner to provide Interruptible Demand and Direct Control Load Management upon requests by the Transmission Operators, Balancing Authorities, and Reliability Coordinators.

In MOD-031-2 R1.4.5 requires the Planning Coordinator or Balancing Authority to request, as necessary, total available peak hour forecast of controllable and dispatchable Demand Side Management from the applicable entities. R2 then requires each applicable entity identified in the data request to provide the requested data to the PC or BA.

In IRO-010-2 R1 requires the Reliability Coordinator to list necessary data and information needed to perform its Operating Planning Analyses and Real-Time Assessments, and R2 requires the RC to distribute its data specifications to all applicable entities. R3 then requires each applicable entity to respond to the request as specified.”

Additionally, the premise of MOD-020-0 R1 is that the BES can be protected through load reduction through interruption of demands or direct control load management (DCLM). While general reliability can be and is enhanced through the Resource Planner’s consideration of interruptible demands, real time reliability is not affected since TOPs, BAs and RCs do not have direct authority to interrupt load, and the tools to effectuate an interruption through other functional entities take too long to respond to real time events. With respect to DCLM, a load control program covers loads spread across a broad area and is not concentrated in specific areas that would help in real time. Since TOPs, BAs and RCs have no ability to reduce loads through interruption or DCLM, having information about the amount of interruptible demands and DCLM is of no value and the requirement to provide such information adds unwarranted burden.

Likes 0

Dislikes 0

### Response

**Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name** SPP Standards Review Group

**Answer**

**Document Name**

**Comment**

Based on the list contained in the question, the order of highest priority should be CIP, COM, IRO, FAC, and MOD families. For the 2019 reviews, it may be more efficient to forego grading standards that are, or are expected, to be retired or modified pursuant to the Standards Efficient Review project.

Likes 0

Dislikes 0

### Response

**Teresa Cantwell - Lower Colorado River Authority - 1,5, Group Name** LCRA Compliance

**Answer**

**Document Name**

**Comment**

LCRA would like to see a higher priority placed on the MOD suite of standards as these are newer standards and are not as “mature” as other standards. Ensuring accurate models and model validity is also of great importance in the area of system modeling.

Likes 0

Dislikes 0

**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer**

**Document Name**

**Comment**

Reclamation recommends MOD-026-1 and MOD-027-1 should have the highest priority for review in 2019.

(Q4) Reclamation supports clarifying the timeframes expected in these standards by moving language from Attachment 1 into the requirements.

Likes 0

Dislikes 0

**Response**

**Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6**

**Answer**

**Document Name**

**Comment**

COM-002-4

Likes 0

Dislikes 0

**Response**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

**Document Name**

**Comment**

IRO-006-5 - BPA agrees with the PC for deletion of "in another interconnection" from R1. The plain reading of current R1 applies only to TLR requests from responsible entities (RC, BA, TOP) in another Interconnection to RCs or BAs in a different interconnection, and only requires curtailments of those "transactions that cross an Interconnection boundary."

If the suggested language is removed, then the remaining language continues to be focused on only "transactions that cross an interconnection boundary." This still keeps the focus of the standard to be applied between RCs. BPA is not sure that is the result that the PC wanted – that the standard "should apply to all TLRs regardless of interconnection boundaries."

Likes 0

Dislikes 0

**Response**

12. Please provide any additional comments here, on improving the standards grading process, the SRT's approach to standards grading, or any other input you believe would be helpful in instructing the SRT's final grading.

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Teresa Cantwell - Lower Colorado River Authority - 1,5, Group Name LCRA Compliance

Answer

Document Name

Comment

LCRA appreciates the opportunity to comment and review from an industry perspective.

Likes 0

Dislikes 0

Response

Matthew Harward - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name SPP Standards Review Group

Answer

Document Name

Comment

Given the multiple and diverging opinions and comments contained in the 2018 Grading Tool Master spreadsheet, it may be too generalized to ask whether the reviewing entity agrees with the findings with merely a "yes" or "no". Additionally, the 2018 Grading project includes standards that are being reviewed and proposed for retirement pursuant to the Standards Efficiency Review, and to the extent Standards Grading runs parallel with the work of the Standards Efficiency Review team, structuring the grading so that it does not contain duplicative or conflicting recommendations would be a more efficient use of resources.

Likes 0

Dislikes 0

**Response**

**Terry Blilke - Midcontinent ISO, Inc. - 2**

**Answer**

**Document Name**

**Comment**

Our understanding of the purpose of Standards Grading is to use technical committee input to determine whether the set of standards are effective and efficient. We support this concept, but not how the process has been applied.

Assuming NERC is following sound quality practices to create standards, there should not be a need to make incremental changes or improvements early in the standards lifecycle. Unless there is a fatal flaw with a standard, there should be no periodic review or other changes under a different initiative until a standard has undergone two audit cycles (been effective for at least 7 years). There is only one standard in this grading set that fist this criterion.

Grading should be done as a first step in the periodic review process and then only after the suggested 7 year point. Additionally, the industry should be given a chance to voice their opinion on whether the review team’s recommendations merit officially opening the standard for changes.

Finally, this grading effort seems duplicative of the SER and any changes to standards (other than FERC-directed standards) should wait until the SER effort is complete.

Likes 0

Dislikes 0

**Response**

**Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC**

**Answer**

**Document Name**

**Comment**

Although a grading scale can be a means to monitor the standards, the parameters used in the process alone cannot truly tell the story of how each standard is performing. Because the standards grading parameters are designed to be applicable across all standards and not directed to measure the intent and effectiveness of each unique standard, the results tend to generalize too much. This generalization is reflected in the high correlation of the average scores. At a minimum, it is apparent that there is questionable value in having four independent technical committees responding to the questions for each standard. The high correlation in the average scores indicates the standards either have reached “steady state” and needs no review – or if that is not the expected result, then the process needs to be changed. We believe it is a clear indication that the process and the grading category/criteria need to be reviewed and updated.

Timing of Reviews

Our understanding of the purpose of Standards Grading is to use technical committee input to determine whether the set of standards are of good quality, effective and efficient. The IRC SRC supports the concept, but not on which standards they have been applied.

Given that NERC employs a stakeholder process to develop and approve its standards which include subject matter experts, there should not be a need to make incremental improvements early in a standard's lifecycle. If standards have a significant number of self-reports or violations after a few years then a standards grading team could analyze if the violations were interpretation or poor standard design and then they should be put on the list for grading and review.

At that point, grading can be done as part of the periodic review. Additionally, the industry should be given a chance to voice their opinion on whether the review team's recommendations merit officially opening the standard for changes.

#### Reviewers

The NERC Standard Process is built on some several built-in concepts. One concept is that proposed standards are filtered by the Industry and that Industry-supported standards are reviewed by the FERC. Therefore, there seems to be little value in asking (as does the Grading Process) if an approved mandatory standard "supports a Reliability Principle", or if "the correct entities are identified".

#### Additional Considerations

The grading and monitoring of the effectiveness of standards must be revised to include the concept of the effectiveness of the standard to support reliability with less subjective and more quantitative measures. We understand that the Standards Committee and the technical committee attempted to create just such a grading mechanism prior to proposing the present grading tool. More work should be done to explore ways to quantitatively measure standards performance as they pertain to their reliability purpose. Such work should could be done during the standards drafting phase. Given the historical evolution of the changes to NERC standards, putting the standards drafting teams accountable to creating quantitative reliability measures is consistent with efforts which try to "clean-up" standards like Paragraph 81, Standards Efficiency Review, and even Reliability Based Compliance which are intended to focus resources on those requirements which have the greatest impact on reliability. Quantitative measures associated with proposed standards would focus the standards drafting teams and industry review and understanding towards what requirements are truly focused on reliability.

Likes 0

Dislikes 0

#### Response

**Richard Vine - California ISO - 2**

**Answer**

**Document Name**

**Comment**

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

#### Response



Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Document Name

Comment

Below, are noted issues that the NSRF has experienced within this current set of Standards and recommend they be added to the PR list. The NSRF believes this is one method for industry to comment on issues experienced while employing the PR group of Standards. We also recommend that the questions to industry (this form) does not ask if we agree with the comments (PC, OC, NERC, RE) but rather are there any additional issues that Entities have experienced with the Standards relating to whether individual standards are necessary, clear, and efficient in addressing identified reliability risks.

The NSRF request revising the “within 90 calendar days” obligation in MOD-026, R6 and MOD-027-1, R5 because it may take more than 90 days for a power flow application software developer to conclude that a model is unusable or modify its application to make a model usable. We suggest revising the wording to “within 90 calendar days or a mutually agreed timeframe”.

The NSRF does not disagree with any comment as we do not want to suppress any views and inputs from any review group. Since the gathered information (score) will be used in the prioritization of the 2019-2020 RSDP.

The NSRF recommends that there needs to be a balance between the amount of resources (time, personnel hours, cost, etc.) put into the standards grading process and the benefit that our industry will receive from the review. As stated in the preamble, “*The primary focus of standards development activity has shifted to Periodic Reviews (PRs) to determine whether individual standards are necessary, clear, and efficient in addressing identified reliability risks.*” Then there must be continuous action after the grading is completed as there are valid comments by the review groups that need to be addressed. Our industry needs well-worded Standards by which the intent is accomplished for the reliability of the BPS. Not an audit “got cha” due to the ambiguous wording of the Standard or auditor’s view that is different from an Entity’s view. We, the industry have put a great amount of resources into this project and want to see it succeed starting in 2019.

Likes 0

Dislikes 0

Response

### Comments information received from Ruida Shu - NPCC

#### Questions

The tool provides a summary of the scoring for each standard and requirement. The SRT would like industry feedback on each of the questions below. Note that the tool has “Content” (C1-C3) questions and “Quality” (Q1-Q13) questions. If providing comment, indicate the question (e.g., C2, Q5, etc.) that best matches your concern.

1. For **CIP-014-2**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

Comments:

2. For **COM-002-4**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

Comments:

3. For **FAC-003-4**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

Comments:

4. For **FAC-013-2**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

Comments:

5. For **IRO-006-5**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

Comments:

6. For **MOD-020-0**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

Comments:

7. For **MOD-025-2**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

Comments:

8. For **MOD-026-1**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

Comments:

9. For **MOD-027-1**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

Comments:

10. For **MOD-028-2**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

Comments:

11. Two Periodic Reviews are planned for 2019 from the following eligible standards and standards families: CIP-014-2, COM-002-4, FAC-003-4, FAC-013-2, IRO-006-5, MOD-020-0, MOD-025-2, MOD-026-1, MOD-027-1, and MOD-028-2. Based on the ongoing efforts of the SRT, which standards and standards families should have the highest priority for review in 2019? Please explain your response.

Comments:

Highest priority for review should be MOD-026-1 and MOD-027.1. We believe that the MOD-026-1 and MOD-027-1 standards have a gap in that they have left out elements like SVCs and STATCOMs. These devices provide essentially reliability services. They are installed to increase transfer limits. The fact that they are omitted results in a reliability gap.

MOD-026-1 only requires tests completed, and relies on the GO or TO to exercise their own judgement/determination on the degree of adequacy and completeness of these tests. For example the Generator, Exciter, PSS, and VC models must be confirmed: "Documentation demonstrating the applicable unit's model response matches the recorded response for a voltage excursion from either a staged test or a measured system disturbance". One cannot truly provide an accurate model without more than one test. That is to say, one can match the response to a voltage excursion with many parameters being incorrect. The wording in the standard only requires some voltage excursion.

We also find that the wording in both standards is 'loose' on the accuracy of the models, in that it does not provide sufficient specificity/criteria for judging accuracy. This may lead to circular arguments between the GO and TOP. For example, a GO who does not use the models may have a different view of what is accurate as compared to the planners using the models. Therefore they may submit a model and the TP may state it is not accurate enough, and the GO may argue that it is good (with a lot of back and forth and no resolution).

Inaccurate/invalid models of governors have a negative effect on the entire interconnections' ability to study events.

12. Please provide any additional comments here, on improving the standards grading process, the SRT's approach to standards grading, or any other input you believe would be helpful in instructing the SRT's final grading.

Comments:

***Comments information received from Brian Van Gheem - ACES***

## **Questions**

The tool provides a summary of the scoring for each standard and requirement. The SRT would like industry feedback on each of the questions below. Note that the tool has "Content" (C1-C3) questions and "Quality" (Q1-Q13) questions. If providing comment, indicate the question (e.g., C2, Q5, etc.) that best matches your concern.

1. For **CIP-014-2**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

Comments:

We believe the content and quality scoring identified by the SRT confirms that the requirements of this Reliability Standard are well understood. To clarify any inconsistencies or ambiguities, industry responded by developing implementation guidance, some of which is even ERO Enterprise-Endorsed. We disagree with the suggestions to revise the Reliability Standard to clarify criteria necessary for the risk assessment methodology, as well as reducing the timeframe between risk assessments.

2. For **COM-002-4**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

3. For **FAC-003-4**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

4. For **FAC-013-2**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

5. For **IRO-006-5**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

6. For **MOD-020-0**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

7. For **MOD-025-2**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

8. For **MOD-026-1**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

Comments:

(1) We believe the content and quality scoring identified by the SRT confirms the adequacy of the requirements of this Reliability Standard. However, one SRT representative identified significant reliability gaps with this and the MOD-027-1 Reliability Standard. If such a reliability gap exists, we believe the representative should capture their concerns in a SAR and follow the Standard Development Process defined within the NERC Rules of Procedure. The SRT identified other concerns regarding the quality of models provided to TPs. We believe these concerns should also be incorporated into the SAR to provide some proactive accountability to TPs.

(2) One SRT representative stated that “one cannot truly provide an accurate model without more than one test.” We remind the SRT that such facilities were tested on numerous occasions by the manufacturer prior to site installation. Moreover, for compliance with this Reliability Standard, an entity confirms no significant deviations exist for the validity and accuracy of the initial base model. This is done using several individual field tests, conducted on the same or consecutive days during the facility’s outage, and then collectively consolidated into one best test result.

9. For **MOD-027-1**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

Comments:

We believe the comments identified for Reliability Standard MOD-026-1 apply to this standard too.

10. For **MOD-028-2**, do you agree with the scoring and findings of the SRT? If not, please comment on which tool question(s) the comment applies to and provide a supporting explanation.

Yes

No

11. Two Periodic Reviews are planned for 2019 from the following eligible standards and standards families: CIP-014-2, COM-002-4, FAC-003-4, FAC-013-2, IRO-006-5, MOD-020-0, MOD-025-2, MOD-026-1, MOD-027-1, and MOD-028-2. Based on the ongoing efforts of the SRT, which standards and standards families should have the highest priority for review in 2019? Please explain your response.

Comments:

We believe COM-002-4 and the identified MOD Standard Family should have the highest priority for review in 2019. We also agree with the suggestion of moving the communications protocols to a Reliability Guideline. The MOD Reliability Standards still contain functional registrations that have since been retired (e.g. LSE), and these standards should be revised to remove these references accordingly. We believe the other standards proposed for a review should be allowed time to mature, unless there is a reliability impact identified.

12. Please provide any additional comments here, on improving the standards grading process, the SRT's approach to standards grading, or any other input you believe would be helpful in instructing the SRT's final grading.

Comments:

(1) We thank the SRT for consolidating all the individual responses and comments into a summary worksheet. The additional worksheet made the review of the Standards Grading Tool easier this year.

(2) However, we still have concerns regarding the overall standard grading process. The process consolidates input from two distinct sample sets equally assessed by NERC and the Regional Entities. Moreover, the consolidation of individual committee member entries into a single SRT representative entry removes any statistical outliers or provides an opportunity for individual committee member entries to be reassessed their initial entries through after-the-fact committee alignment discussions. We believe four data sets are statistically insufficient for data collection, as many statistical textbooks identify that a sampling set of at least 30 is necessary. At a minimum, the process should not allow a consolidation of individual committee member entries into a single SRT representative entry.

(3) We question how a process can identify a content and quality score of 100%, yet disregard responses to the three general questions regarding Reliability Objectives, Paragraph 81 criteria, and appropriateness for guidance development. This year, the risk assessment for CIP-014 and the communications protocols of COM-002 were identified as being better served in a Reliability Guideline, yet the participants continued to score the related requirements necessary for reliability. If a requirement is identified as meeting the Paragraph 81 criteria or should be developed into a Reliability Guideline, then a project should be considered to retire that requirement regardless of other grading identified.

(4) We believe some of the questions have identical meanings that unfairly weigh those responses with other questions. For instance, how different is the content question "identifying who does what and when" from the question regarding the identification of the correct functional entity? Likewise, the quality question asking if the requirement is "complete and self-contained" is nearly identical to the question asking if the requirement is "stand-alone" or should it be consolidated with other standards. What reference materials are

available that provide background and the expectations associated with answering the content and quality questions, and has these materials been provided to the SRT? We believe the FAQ document should be expanded to clarify the meaning of each question and how potential scoring values should be interpreted.

(5) We thank you for this opportunity to comment.