

## **Consideration of Comments on Second Posting of Coordinate Operations Standard**

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### **Background**

The Coordinate Operations Standard Drafting Team thanks all those who submitted comments with the last posting of the standard. After careful review and consideration of all comments received, the drafting team has modified the standard and is posting it for a 30-day review period, prior to ballot.

The Coordinate Operations Standard was posted for a second public comment period from June 2- July 2, 2004. The SDT asked industry participants to provide feedback to the standard through a special Standard Comment Form. There were 22 sets of comments, including comments from more than 96 different people 7 of the 9 Industry Segments, and all NERC Regions as shown in the table on the following pages. The comments can be viewed in their original format at:

[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/COORD\\_OPERATIONS\\_05\\_02\\_Comments.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/COORD_OPERATIONS_05_02_Comments.pdf)

The SDT made changes to the definitions and the standard based on the comments submitted by industry participants. The SDT's consideration of comments is provided in yellow highlighted text immediately under each question.

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 Director of Standards, Gerry Cauley at 609-452-8060 or at [gerry.cauley@nerc.net](mailto:gerry.cauley@nerc.net).

**There were only a very few, minor changes made to the standard, including those listed below:**

#### **Definitions:**

- Adopted the Adverse Reliability Impact definition from the Balance Resources and Demand standard
- Adopted the Real-time definition from the Operate within Limits standard

#### **Requirement 101 - 103**

- Changed adverse impact to 'Adverse Reliability Impact' to conform to the term used in other standards under development.
- Modified the language in the Compliance Monitoring sections to make it easier to understand and to eliminate language that would have placed requirements on the Compliance Monitor that may have conflicted with Regional Compliance Programs.
- Changed 'five days' to 'five business days' to clarify what was intended with respect to the time allowed for a RA to provide evidence to its Compliance Monitor
- Modified the levels of Non-compliance as requested to place a greater sanction on events that had adverse consequences

The SDT feels that additional postings of this standard for comment will not result in any additional significant changes to the standard and is moving the standard forward for its initial ballot.

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Commenter  "I" indicates a comment submitted by an individual  "G" indicates a comment submitted by one of the groups listed at the end of the table	Organization	Industry Segment								
		1	2	3	4	5	6	7	8	9
Scott Moore (G-10)	AEP	X								
Raj Rana (G-11)	AEP	X		X			X			
Dan Boezio (G-11)	AEP	X		X			X			
Dale McMaster (G-1)	AESO		X							
Peter Burke (I)	ATC	X								
Ed Riley (I) (G-1)	CA-ISO		X							
Alan Gale (G-4)	City of Tallahassee					X				
Bob Remly (G-4)	Clay Electric Cooperative			X						
Jason Smith (I)	Entergy	X								
Nat Stephens (I)	Entergy	X								
Jerry Stout (I)	Entergy	X								
Lynnda Ell (I)	Entergy Services	X								
Sam Jones (G-1)	ERCOT		X							
Joe Krupar (G-4)	Florida Municipal Power Agency			X						
Wendell Payne (G-4)	FPL	X								
Pedro Modia (G-4)	FPL	X								
Patti Metro (G-4)	FRCC		X							

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Linda Campbell (G-4)	FRCC		X			
Mark Bennett (G-4)	Gainesville Regional Utilities				X	
Dick Pursley (G-5)	Great River Energy		X			
David Kiguel (G-8)	Hydro One Networks (Ontario)	X				
Darrel W. Richardson (I)	IL Power Co	X			X	
Don Tench (G-1)	IMO		X			
Peter Henderson (G-12)	IMO		X			
Khaqan Khan (G-12) (G-8)	IMO		X			
Kathleen Goodman (G-8) (I)	ISO New England		X			
John Norden (G-8)	ISO New England		X			
Peter Brandien (G-1)	ISO-New England		X			
Karl Tammar (G-1)	ISO-RTO Council		X			
Ted Hobson (G-4)	JEA	X				
Mike Gammon (G-10)	KCPL	X				
Paul Elwing (G-4)	Lakeland Electric				X	
Amy Long (G-4)	Lakeland Electric	X				
Richard Gilbert (G-4)	Lakeland Electric				X	
John Horakh (I)	MAAC		X			
Gerald Rheault (I)	Manitoba Hydro	X		X	X	X
Robert Coish (G-5)	Manitoba Hydro		X			
Joe Knight (G-5)	MAPPCOR		X			
Paul Koskela (G-5)	Minnesota Power		X			

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Bill Phillips (G-1)	MISO		X
John Swanson (G-5)	Nebraska Public Power District		X
Ralph Rufrano (G-8)	New York Power Authority	X	
Alan Adamson (G-8)	New York State Reliability Council		X
Guy Zito (G-8)	Northeast Power Coordinating Council		X
Brian Hogue (G-8)	Northeast Power Coordinating Council		X
David Little (G-8)	Nova Scotia Power	X	
Karl Tammar (G-1)	NYISO		X
Michael C. Calimano (I)	NY-ISO		X
Joseph C. Fleury (I)	NYSRC		X
Joe Roos (G-4)	Ocala Electric Utility		X
Todd Gosnell (G-5)	Omaha Public Power District		X
Tom Washburn (G-4)	Orlando Utilities Commission		X
Tom Calabro (G-4)	Orlando Utilities Commission		X
Larry Larson (G-5)	Otter Tail Power		X
Bruce Balmat (G-1)	PJM		X
Albert DiCaprio (G-2)	PJM		X
Bruce Balmat (G-2) (G-1)	PJM		X
Joseph Willson (G-2)	PJM		X
Mark Kuras (G-2)	PJM		X
Preston Pierce (G-4)	Progress Energy Florida	X	
Philip Riley (G-3)	PSC of SC		X

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Mignon Clyburn (G-3)	PSC of SC				X
Elizabeth B. Fleming (G-3)	PSC of SC				X
G. O'Neal Hamilton (G-3)	PSC of SC				X
John E. Howard (G-3)	PSC of SC				X
Randy Mitchell (G-3)	PSC of SC				X
C. Robert Moseley (G-3)	PSC of SC				X
David A. Wright (G-3)	PSC of SC				X
Bernie Budnik (G-4)	Reedy Creek Improvement District		X		
John Giddens (G-4)	Reedy Creek Improvement District		X		
Ray Crooks (G-4)	Reedy Creek Improvement District			X	
Roman Carter (G-6)	SCGEM			X	
Joel Dison (G-6)	SCGEM			X	
Tony Reed (G-6)	SCGEM			X	
Lucius Burris (G-6)	SCGEM			X	
Clifford Shepard (G-6)	SCGEM			X	
Steve Wallace (G-4)	Seminole Electric Cooperative		X		
Marc Butts (G-7)	Southern Company Services	X			
Raymond Vice (G-7)	Southern Company Services	X			
John Lucas (G-7)	Southern Company Services	X			
Mike Hardy (G-7)	Southern Company Services	X			
Doug McLaughlin (G-7)	Southern Company Services	X			
Roger Green (G-6)	Southern Generation			x	

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Carl Monroe (G-1)	SPP	x
Robert Rhodes (G-10)	SPP	X
Chuck Feagans (G-9)	Tennessee Valley Authority	X
Sue Goins (G-9)	Tennessee Valley Authority	X
Edd Forsythe (G-9)	Tennessee Valley Authority	X
Gary Lewis (G-9)	Tennessee Valley Authority	X
Jerry Wynne (G-9)	Tennessee Valley Authority	X
Stuart Goza (G-9)	Tennessee Valley Authority	X
Kathleen Davis (G-9)	Tennessee Valley Authority	x
Roger Champagne (G-8)	TransEnergie (Quebec)	X
Peter Lebro (G-8)	US National Grid	X
Darrick Moe (G-5)	WAPA	X
Martin Trence (G-5)	Xcel Energy	X

G1 – ISO/RTO Council  
 G2 – MAAC  
 G3 - PSC of SC  
 G4 – FRCC  
 G5 – MAPPCOR  
 G6 - SCGEM

G7 – Southern Company Services  
 G8 - NPCC, CP9 Reliability Standards Working Group  
 G9 – TVA  
 G10 – SPP ORWG  
 G-11 – AEP  
 G-12 - IMO

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1. Do you agree with the changes made to the definition of Operating Procedure?

Summary consideration: Most commenters indicated they like the changes the SDT made to the definition. By using the word, 'should', the definition allows the system operator the flexibility to not follow the procedure as written if conditions present don't match those expected to be present. Each entity may add a standard phrase within each procedure to state that the system operator should only follow the procedure if the conditions present match the conditions expected to be present.

Commenter	Yes	No	Comments
Michael C. Calimano; NY-ISO; #2		x	The word 'must' is preferred. Operating Procedures must be followed
<p>By using the word, 'should', the definition allows the system operator the flexibility to not follow the procedure as written if conditions present don't match those expected to be present. If the word, 'must' were used in the definition, this could imply that the procedure must always be followed, step by step, exactly as written, even if the real-time conditions did not match the conditions for which the procedure were written.</p>			
Ed Riley; CA-ISO; #2		x	The word "must" is preferred over the word "shall". Operating Procedures need to be followed and in most cases in a specific order presented in the procedure. A qualifier can be added to the definition that allows the operator to vary from the procedure as warranted by system conditions.
<p>By using the word, 'should', the definition allows the system operator the flexibility to not follow the procedure as written if conditions present don't match those expected to be present. During the last posting of this standard, several entities indicated they were opposed to the use of the word, 'must' because, to them, the use of the word 'must' in the definition, implied that the procedure must always be followed, step by step, exactly as written, even if the real-time conditions did not match the conditions for which the procedure were written.</p> <p>A qualifier can be added to each procedure that allows the operator to vary from the procedure as warranted by system conditions.</p>			
<p>Karl Tammar; ISO-RTO (Group of 9); #2</p> <p>Peter Henderson / Khaqan Khan; IMO; #2</p>		x	<p>The word must is preferred but with the additional caveat added. See below:</p> <p>Operating Procedure: A document that identifies specific steps or tasks that <b>must</b> be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure <b>must</b> be followed in the order in which they are presented, and should be performed by the position(s) identified, <b>unless operating in that exact order is not appropriate for the specific situation</b>. A document that lists the specific steps to take in removing a specific transmission line from service is an example of an Operating Procedure.</p>



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<p>By using the word, 'should', the definition allows the system operator the flexibility to not follow the procedure as written if conditions present don't match those expected to be present. During the last posting of this standard, several entities indicated they were opposed to the use of the word, 'must' because, to them, the use of the word 'must' in the definition, implied that the procedure must always be followed, step by step, exactly as written, even if the real-time conditions did not match the conditions for which the procedure were written.</p>			
Al DiCaprio; MAAC (Group of 5); #2	x		MAAC agrees that the System Operator should not be made a slave to a printed procedure and must be allowed to vary procedures to fit the situations.
<p>Agreed. The SDT changed the definition after the first posting of this standard to clarify this.</p>			
Philip Riley (Group of 8); PSC of SC; #9	x		The PSCSC agrees real-time conditions may vary from expected conditions. We also believe procedures are the consensus best way to do the job. Therefore, if problems arise as a result of procedure non-compliance, we would expect a root-cause analysis to be conducted, with lessons-learned communicated to the appropriate people and fed back into the appropriate procedures.
<p>Agreed. This is what would normally happen, although this standard does not address analyses of events. There is another standard that will address analyses of events.</p>			
Gerald Rheault; Manitoba Hydro; #1,3,5,6	x		
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6	x		
Robert Coish; MAPP (Group of 9); #2	x		
Roman Carter; SCGEM (Group of 6); #5,6	x		
Marc Butts; Southern Company Services (Group of 5); #1	x		
Darrel W. Richardson; IL Power Co; #1,3	x		
Guy Zito; NPCC – CP9 (Group of 10) #1,2	x		
Peter Burke; ATC; #1	x		

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Kathleen A. Davis (Group of 7); TVA #1	x		
Kathleen Goodman; ISO-NE; #2	x		
Scott Moore; SPP (ORWG -6)#1,2	x		
John Horakh; MAAC; # 2	x		
Lynnda Ell; Entergy Services, Inc.; #1	x		
Raj Rana; AEP; #1,3,6	x		
Joseph C. Fleury; NYSRC; #2	x		

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

Summary consideration: The SDT had asked this question with the intent of using the response to modify all the Compliance Monitoring sections– and this question led to some confusion. Because some commenters indicated the language indicating that ‘an entity shall be subject to re-audit every 90 days until found fully compliant’ was inappropriate, the SDT sought the advice of NERC’s VP-Compliance and he recommended this language be removed from the entire standard because it may conflict with Regional Compliance Programs. Each Region has its own requirements for mitigation plans and including this requirement may conflict with those programs.

Commenter	Yes	No	Comments
Gerald Rheault; Manitoba Hydro; #1,3,5,6		x	Any entity which is found non-compliant should be required to prepare a mitigation plan indicating how and when he will take the steps required to become compliant. If this mitigation plan defines a plan and timelines which are unacceptable to the compliance monitor the entity should be required to modify his mitigation plan to meet the expectations of the compliance monitor. This exercise should adequately address the concerns raised above and resolve the problem.
<p>The handling of mitigation plans is handled at the Regional level and on the advice of NERC’s VP-Compliance, the language indicating the non-compliant entity would be subject to re-audit every 90 days has been removed from the revised standard.</p>			
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6		x	<p>The statement above implies that the 90-day re-audit requirement until an entity is fully compliant is used throughout the standard, but is actually only written in Requirement 103. We are not sure what re-auditing every 90 days really accomplishes, and in fact, puts more of a burden on the auditors rather than the non-compliant RA. The levels of non-compliance should be clear enough so that disclosure of non-compliance under the new Disclosure Guidelines will provide the correct incentive to not continue operating in a non-compliant manner. In addition, the NERC Compliance and Certification Committee (CCC) should develop the appropriate sanctions and penalties for the identified levels of non-compliance.</p> <p>Also, the Compliance Monitoring sections for Requirements 101, 102, and 103 still have inconsistent formatting. Formatting recommendations are provided in our following comments.</p>
<p>The SDT had originally planned on including the subject language in all three requirements if supported by the industry.</p>			
<p>The handling of mitigation plans is handled at the Regional level and on the advice of NERC’s VP-Compliance, the language indicating the non-compliant entity would be subject to re-audit every 90 days has been removed from the revised standard.</p>			

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<b>The formatting of the standard is being addressed by NERC's VP-Legal Counsel.</b>		
Al DiCaprio; MAAC (Group of 5); #2		<p>NERC's compliance process requires that all non-compliant entities submit a mitigation plan that (a) describes the actions that will be taken; and (b) when those actions will be implemented.</p> <p>MAAC believes that the addition of the arbitrary 90 day review period is unnecessary and not in keeping with the approved NERC Compliance process</p>
	x	
<b>The handling of mitigation plans is handled at the Regional level and on the advice of NERC's VP-Compliance, the language indicating the non-compliant entity would be subject to re-audit every 90 days has been removed from the revised standard.</b>		
Darrel W. Richardson; IL Power Co; #1,3		<p>However, this would seem to put an unnecessary burden on the Audit Team. It would seem that stiffer monetary penalties or threat of de-certification would have more impact.</p>
	x	
<b>The handling of mitigation plans is handled at the Regional level and on the advice of NERC's VP-Compliance, the language indicating the non-compliant entity would be subject to re-audit every 90 days has been removed from the revised standard.</b>		
Kathleen A. Davis (Group of 7); TVA #1		<p>We assume that the CM is the regional entity. clarify who will perform audits</p>
	x	
<b>The Compliance Monitor is the Regional Reliability Authority or NERC.</b>		
Scott Moore; SPP ORWG -6)#1,2		<p>The question implies that the revision applies to all three sections of the standard but the 90-day re-audit is only referenced in Section 103. The 90-day re-audit revision should apply equally to all three sections of the standard.</p>
	x	
<b>The SDT had originally planned on including the subject language in all three requirements if supported by the industry.</b>		
<b>The handling of mitigation plans is handled at the Regional level and on the advice of NERC's VP-Compliance, the language</b>		
John Horakh; MAAC; # 2		<p>The re-audit requirement is only in Section 103 (d) (1). Shouldn't it also be in Sections 101 (d) and 102 (d) ?</p>
	x	
<b>The SDT had originally planned on including the subject language in all three requirements if supported by the industry.</b>		
<b>The handling of mitigation plans is handled at the Regional level and on the advice of NERC's VP-Compliance, the language</b>		
Raj Rana; AEP; #1,3,6		<p>The question implies that this revised language applies to all three sections, but it is only found in Section 103. The 90-day re-audit should apply to all three sections, 101, 102, &amp; 103.</p>
	x	

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The SDT had originally planned on including the subject language in all three requirements if supported by the industry.			
The handling of mitigation plans is handled at the Regional level and on the advice of NERC's VP-Compliance, the language			
Robert Coish; MAPP (Group of 9); #2	x		
Michael C. Calimano; NY-ISO; #2	x		
Roman Carter; SCGEM (Group of 6); #5,6	x		
Marc Butts; Southern Company Services (Group of 5); #1	x		
Ed Riley; CA-ISO; #2	x		
Karl Tammar; ISO-RTO (Group of 9); #2	x		
Guy Zito; NPCC – CP9 (Group of 10) #1,2	x		
Peter Burke; ATC; #1	x		
Kathleen Goodman; ISO-NE; #2	x		
Lynnda Ell; Entergy Services, Inc.; #1	x		
Peter Henderson / Khaqan Khan; IMO; #2	x		
Philip Riley (Group of 8); PSC of SC; #9	x		
Joseph C. Fleury; NYSRC; #2	x		

3. Do you agree with the change from ‘approve’ to ‘agree to’?

Summary consideration: All commenters agreed with this change.

Commenter	Yes	No	Comments
Philip Riley (Group of 8); PSC of SC; #9	x		The PSCSC believes the important thing is to have assurance that the procedures/processes/plans have been “approved” or “agreed to” and not what the step is called.
This is what the SDT had intended.			
Michael C. Calimano; NY-ISO; #2	x		
Gerald Rheault; Manitoba Hydro; #1,3,5,6	x		
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6	x		
Robert Coish; MAPP (Group of 9); #2	x		
Roman Carter; SCGEM (Group of 6); #5,6	x		
Marc Butts; Southern Company Services (Group of 5); #1	x		
Darrel W. Richardson; IL Power Co; #1,3	x		
Ed Riley; CA-ISO; #2	x		
Karl Tammar; ISO-RTO (Group of 9); #2	x		
Guy Zito; NPCC – CP9 (Group of 10) #1,2	x		
Peter Burke; ATC; #1	x		
Kathleen A. Davis (Group of 7); TVA	x		

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#1			
Al DiCaprio; MAAC (Group of 5); #2	x		
Kathleen Goodman; ISO-NE; #2	x		
Scott Moore; SPP ORWG -6)#1,2	x		
John Horakh; MAAC; # 2	x		
Lynnda Ell; Entergy Services, Inc.; #1	x		
Peter Henderson / Khaqan Khan; IMO; #2	x		
Raj Rana; AEP; #1,3,6	x		
Joseph C. Fleury; NYSRC;	x		

4. Do you agree with this addition to Requirement 101?

**Summary consideration: Most commenters agreed with this requirement and no additional changes were made.**

Commenter	Yes	No	Comments
Al DiCaprio; MAAC (Group of 5); #2			<p>MAAC agrees with the idea but not with the words as written.</p> <p>Requirement 101.a.1.i.f needs clarification. Terminology-wise “adverse impact” is not a defined phrase. Format-wise it doesn’t fit into the list of conditions requiring plans. Having the authority to act for conditions outside one’s RA is one thing; having the obligation to act is another – what is the intent of the requirement?</p> <p>MAAC’s RA has the authority to take all actions appropriate to its tariff and Operating Agreement and does not need a NERC standard to mandate that authority. However, the words written into this posting leaves open the possibility for a standard that will mandate “no adverse impacts” and leave the interpretation of “adverse impact” up to some undefined person or persons.</p>
<p><b>The intent was to require that the RA have the authority to take the actions identified in its documented procedures, processes and plans.</b></p>			
Gerald Rheault; Manitoba Hydro; #1,3,5,6	x		<p>The “Authority” identified in this above statement should be defined in the Agreement to be developed by the RAs with each other as part of the Certification requirements.</p>
<p><b>The SDT agrees and expects that documenting this authority will be required for certification.</b></p>			
Michael C. Calimano; NY-ISO; #2	x		
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6	x		
Robert Coish; MAPP (Group of 9); #2	x		
Roman Carter; SCGEM (Group of 6); #5,6	x		
Marc Butts; Southern Company Services (Group of 5); #1	x		
Darrel W. Richardson; IL Power Co;	x		



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#1,3			
Ed Riley; CA-ISO; #2	x		
Karl Tammar; ISO-RTO (Group of 9); #2	x		
Guy Zito; NPCC – CP9 (Group of 10) #1,2	x		
Peter Burke; ATC; #1	x		
Kathleen A. Davis (Group of 7); TVA #1	x		
Kathleen Goodman; ISO-NE; #2	x		
Scott Moore; SPP ORWG -6)#1,2	x		
John Horakh; MAAC; # 2	x		
Lynnda Ell; Entergy Services, Inc.; #1	x		
Peter Henderson / Khaqan Khan; IMO; #2	x		
Philip Riley (Group of 8); PSC of SC; #9	x		
Raj Rana; AEP; #1,3,6	x		
Joseph C. Fleury; NYSRC; #2	x		

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

Summary consideration: Ongoing reviews are expected to be made to these documents to keep them current. The intent was to set a 'minimum' requirement for how often these reviews must be conducted. If an RA makes changes in their operations that would impact a procedure, and the associated procedure was updated, then those changes have in essence caused the documents to be updated more frequently than mandated, and there is nothing in this requirement to preclude this. The Regions may want to establish a review period that is shorter than 3 years, but the 3 year review period seems to be acceptable to most commenters.

Commenter	Yes	No	Comments
Robert Coish; MAPP (Group of 9); #2		x	Procedures may require updating at any time to reflect changing conditions such as system equipment additions (e.g. new reactive resources available for voltage control). The requirement should be that procedures reflect current system conditions. There should be a Document Change Control Procedure in place to ensure procedures reflect current conditions. An additional periodic review time period should be left up to each RA since different documents may appropriately have different review time periods. Procedures should have a review time period of three years or less.
Ongoing reviews are expected to be made to these documents to keep them current. The intent was to set a 'minimum' requirement for how often these reviews must be conducted. If an RA makes changes in their operations that would impact a procedure, and the associated procedure was updated, then those changes have in essence caused the documents to be updated more frequently than mandated, and there is nothing in this requirement to preclude this.			
Ed Riley; CA-ISO; #2		x	Three years is too long of a review cycle. We recommend review on an annual basis or if an RA has a change in their operations or system that would impact any procedures.
Ongoing reviews are expected to be made to these documents to keep them current. The intent was to set a 'minimum' requirement for how often these reviews must be conducted. If an RA makes changes in their operations that would impact a procedure, and the associated procedure was updated, then those changes have in essence caused the documents to be updated more frequently than mandated, and there is nothing in this requirement to preclude this.			
Scott Moore; SPP (ORWG -6)#1,2		x	A review period of at least annually would be much more appropriate.
Ongoing reviews are expected to be made to these documents to keep them current. The intent was to set a 'minimum' requirement for how often these reviews must be conducted. If an RA makes changes in their operations that would impact a procedure, and the			

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associated procedure was updated, then those changes have in essence caused the documents to be updated more frequently than mandated, and there is nothing in this requirement to preclude this.			
Raj Rana; AEP; #1,3,6		x	Annual review should be required.
Ongoing reviews are expected to be made to these documents to keep them current. The intent was to set a 'minimum' requirement for how often these reviews must be conducted. If an RA makes changes in their operations that would impact a procedure, and the associated procedure was updated, then those changes have in essence caused the documents to be updated more frequently than mandated, and there is nothing in this requirement to preclude this.			
Karl Tammar; ISO-RTO (Group of 9); #2 Michael C. Calimano; NY-ISO; #2	x	x	A review shall be made earlier if an RA makes changes in their operations that would impact a procedure.
Ongoing reviews are expected to be made to these documents to keep them current. The intent was to set a 'minimum' requirement for how often these reviews must be conducted. If an RA makes changes in their operations that would impact a procedure, and the associated procedure was updated, then those changes have in essence caused the documents to be updated more frequently than mandated, and there is nothing in this requirement to preclude this.			
Peter Henderson / Khaqan Khan; IMO; #2	x		We also support that the review to be made on a bi-annual basis. A review should/could be made earlier if an RA makes significant changes in their operations that would/could impact this procedure.
The standard requires a minimum of once every three years – this doesn't preclude an entity from reviewing these documents more frequently.			
John Horakh; MAAC; # 2	x		Every three years or more frequently
The standard requires a minimum of once every three years – this doesn't preclude an entity from reviewing these documents more frequently.			
Gerald Rheault; Manitoba Hydro; #1,3,5,6	x		
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6	x		
Roman Carter; SCGEM (Group of 6); #5,6	x		
Marc Butts; Southern Company Services (Group of 5); #1	x		

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Darrel W. Richardson; IL Power Co; #1,3	x		
Guy Zito; NPCC – CP9 (Group of 10) #1,2	x		
Peter Burke; ATC; #1	x		
Kathleen A. Davis (Group of 7); TVA #1	x		
Al DiCaprio; MAAC (Group of 5); #2	x		
Kathleen Goodman; ISO-NE; #2	x		
Lynnda Ell; Entergy Services, Inc.; #1	x		
Philip Riley (Group of 8); PSC of SC; #9	x		
Joseph C. Fleury; NYSRC; #2	x		

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

**Summary consideration: All commenters indicated support for this inclusion in the standard.**

Commenter	Yes	No	Comments
Roman Carter; SCGEM (Group of 6); #5,6 Marc Butts; Southern Company Services (Group of 5); #1	x		We recommend that each Procedure, Process or Plan have a version number AND date.
The intent in having a version control number or date is to ensure that two or more RAs using one of these documents have some element that can be referenced to verify that both entities have the same version of the document. This could be accomplished by having a version number or by using a date, but requiring both is not essential. Including both would be good practice, but goes beyond what was intended for this requirement.			
Darrel W. Richardson; IL Power Co; #1,3	x		However, we are not sure of the value of the version control number or date unless two documents happen to be side-by-side. If an operator only has one document in front of them, how does this ensure the operator has the latest version.
The intent in having a version control number or date is to ensure that two or more RAs using one of these documents have some element that can be referenced to verify that both entities have the same version of the document. The entities using these documents for coordination of activities will most likely be RAs in different geographic locations.			
John Horakh; MAAC; # 2	x		Change the requirement to "Include the date revised or reviewed". A version control number would only insure that everyone is using the same version. The date should be required, either the date revised or the date reviewed, if no changes were made upon review. With the date, you can tell if the review is being done as required. The date also insures everyone is using the same version.
Since different entities use 'date' in different ways, for example, approval date, revision date, etc., we removed the 'approval' from the reference to date in the measure. This allows entities to use approval date, revision date, effective date, or any other type of date that is most appropriate. The intent was to provide the end users with a reference that could be exchanged between users to confirm that all involved had the same version of the document in hand.			
Michael C. Calimano; NY-ISO; #2	x		
Gerald Rheault; Manitoba Hydro; #1,3,5,6	x		

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Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6	x		
Robert Coish; MAPP (Group of 9); #2	x		
Ed Riley; CA-ISO; #2	x		
Karl Tammar; ISO-RTO (Group of 9); #2	x		
Guy Zito; NPCC – CP9 (Group of 10) #1,2	x		
Peter Burke; ATC; #1	x		
Kathleen A. Davis (Group of 7); TVA #1	x		
Al DiCaprio; MAAC (Group of 5); #2	x		
Kathleen Goodman; ISO-NE; #2	x		
Scott Moore; SPP ORWG -6)#1,2	x		
Lynnda Ell; Entergy Services, Inc.; #1	x		
Peter Henderson / Khaqan Khan; IMO; #2	x		
Philip Riley (Group of 8); PSC of SC; #9	x		
Raj Rana; AEP; #1,3,6	x		
Joseph C. Fleury; NYSRC; #2	x		

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

Summary consideration: The intent of a distribution list is to ensure that there is some documentation that identifies the entities that should receive a copy of the associated procedure. The standard is silent on how detailed the distribution list needs to be.

Commenter	Yes	No	Comments
Raj Rana; AEP; #1,3,6			Not a big issue could go either way.
Roman Carter; SCGEM (Group of 6); #5,6 Marc Butts; Southern Company Services (Group of 5); #1		x	This may be a good practice for some procedures (spanning RA to RA agreements) but should not be a requirement for all procedures.
Most commenters supported the inclusion of a distribution list and this was not removed from the standard.			
Al DiCaprio; MAAC (Group of 5); #2		x	MAAC questions the value of a NERC Standard that requires a Distribution list for procedures when electronic distribution and web-site distribution is a growing trend.
The standard doesn't require that the distribution list be paper-based –the use of an electronic distribution list is not precluded from this standard.			
Robert Coish; MAPP (Group of 9); #2	x		The distribution list could be indicated by a distribution list reference number on some documents to avoid having to produce long lists on every document.
The standard doesn't require any particular type of distribution list - the use of a distribution list reference number with associated tables that identify the members of each distribution list would meet this requirement.			
Kathleen A. Davis (Group of 7); TVA #1	x		should say "distribution list or equivalent"
The standard doesn't require any particular type of distribution list – so the phrase, 'or equivalent' doesn't seem necessary.			
John Horakh; MAAC; # 2	x		The distribution list indicates how the distribution was made on a particular date. The distribution list may change for subsequent dates.
The distribution list is not intended to serve as a record of when a procedure was distributed – it is intended to be a list of entities or individuals who should receive a copy of the associated document.			
Michael C. Calimano; NY-ISO; #2	x		

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Gerald Rheault; Manitoba Hydro; #1,3,5,6	x		
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6	x		
Darrel W. Richardson; IL Power Co; #1,3	x		
Ed Riley; CA-ISO; #2	x		
Karl Tammar; ISO-RTO (Group of 9); #2	x		
Guy Zito; NPCC – CP9 (Group of 10) #1,2	x		
Peter Burke; ATC; #1	x		
Kathleen Goodman; ISO-NE; #2	x		
Scott Moore; SPP ORWG -6)#1,2	x		
Lynnda Ell; Entergy Services, Inc.; #1	x		
Peter Henderson / Khaqan Khan; IMO; #2	x		
Philip Riley (Group of 8); PSC of SC; #9	x		
Joseph C. Fleury; NYSRC; #2	x		



8. Do you have any other comments on Requirement 101?

**Summary consideration: Most commenters agreed with the requirement as proposed, and no significant changes were made.**

Commenter	Yes	No	Comments
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6	x		<p>General Questions/Comments:</p> <ul style="list-style-type: none"> <li>Requirements (a)(1) states that "... Operating Procedures, Processes or Plans shall address Scenarios that affect other Reliability Authority Areas as well as those developed in coordination with other Reliability Authorities..." What if a Reliability Authority does not know a scenario affects another Reliability Authority? Should there be a process in-place to communicate a new condition that occurs or is this the intention of Requirement 103?</li> </ul> <p>If a new condition occurs, and requires coordination with other RAs, this is addressed in Requirement 103.</p> <ul style="list-style-type: none"> <li>Measures (b)(1)(i) – the listing of these items (A-F) should not be included since the measure is that the Reliability Authority has provided for real-time use the latest approved version of the Operating Procedures, Processes, or Plans and the items in (b)(1)(i) are already identified in the requirements portion of 101.</li> </ul> <p>The industry agreed with the requirements and measures as they appear in the standard. There does seem to be some disagreement in the industry on whether details should be included in the requirement as well as the measure or whether the requirement should be a high level statement of the desired performance, with the details of the desired performance identified in the measures.</p> <ul style="list-style-type: none"> <li>Measures (b)(1)(ii) – "... The Reliability Authority shall have evidence that these Operating Procedures, Processes or Plans were..." For clarity, examples of the type of evidence should be provided. Possibly, documentation of agreement date and the distribution date.</li> </ul> <p>There are many different types of evidence, and this has been left to each individual entity – it could include items such as signatures on procedures, copies of approved meeting minutes, tapes of phone conversations, copies of email transmittals, etc.)</p>

		<p>Based on our comments above we recommended the reformatting of (a)(1)(i) and (a)(2) for clarity as follows:</p> <p>(a)(1) The Reliability Authority shall have Operating Procedures, Processes, or Plans in place for activities that require notification, exchange of information or coordination of actions with one or more other Reliability Authorities to support interconnection reliability. These Operating Procedures, Processes or Plans shall address Scenarios that affect other Reliability Authority Areas as well as those developed in coordination with other Reliability Authorities.</p> <p>(i) These shall collectively address, as a minimum, the following:</p> <ul style="list-style-type: none"> <li>A) Communications and notifications under which one Reliability Authority notifies other Reliability Authorities including the process to follow in making those notifications; and the data and information to be exchanged with other Reliability Authorities.</li> <li>B) Coordination of information exchange to support reliability assessments.</li> <li>C) Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.</li> </ul> <p>Examples of Scenarios that require Operating Procedures, Processes, or Plans include but are not limited to:</p> <ul style="list-style-type: none"> <li>A) Sabotage attacks</li> <li>B) IROL violations</li> <li>C) Energy and capacity shortages</li> <li>D) Planned or unplanned outage information</li> <li>E) Voltage control, including the coordination of reactive resources for voltage control</li> </ul> <p>The change suggested modifies the list that was supported by the rest of the industry as a 'minimum list' of topics that must be addressed.</p>
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		<p>(a) (2) A Reliability Authority's Operating Procedures, Processes or Plans developed to support another Reliability Authority's Operating Procedure, Process or Plan shall include:</p> <ul style="list-style-type: none"> <li>(i) A reference to the other Reliability Authority's Operating Procedure, Process or Plan.</li> <li>(ii) The agreed-upon actions from the other Reliability Authority's Operating Procedure, Process or Plan.</li> </ul> <p>We also recommend reformatting of (b)(2) for clarity and elimination of duplicate information that is already covered in (b)(1) to:</p> <p>(b)(2) The Reliability Authority's Operating Procedures, Processes or Plans developed (for its system operators' internal use) to support another Reliability Authority's Operating Procedure, Process or Plan shall:</p> <ul style="list-style-type: none"> <li>(i) Include a reference to the associated source document, and</li> <li>(ii) Support the agreed-upon actions from the source document. (What is meant by "support"? The word support can have different meanings to different people. This should be clear.)</li> </ul> <p>There are many different ways of presenting this information, and since the industry seems to support the format already used, the SDT did not make the suggested change. We've asked the industry to comment on the technical content of the standard, not the format. David Cook, NERC's VP-Legal Counsel, is providing oversight to the format.</p>
Kathleen A. Davis (Group of 7); TVA #1	x	<p>101 Procedures (a) Requirements (1) ".....shall address Scenarios that affect other Reliability Authority Areas....."</p> <p>The term "Scenarios" needs clarification. This is defined as a "Possible Event." If the required analysis of Scenerios is defined in other Standards then a reference to that Standard should be given. As written this is too vague!</p>
<p>The SDT is not aware of any other SDT that is using the term, 'Scenario'. Right now, we only have 1 standard approved – for Cyber Security. Several others are in various stages of development, and there is no way to foresee all the references that may occur in these standards. Anyone who uses the word, 'scenario' and capitalizes the word when it is used, must agree to the definition of Scenario as presented here.</p>		
Scott Moore; SPP ORWG -6)#1,2	x	<p>The last sentence in (a)(1) seems redundant. Isn't scenarios that affect other RA</p>

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			Areas basically the same as scenarios developed in coordination with other RAs? Real-time is capitalized in Measures (1). It should be lower case as in the rest of the standard.
A scenario that affects another RA may or may not be one that is already coordinated with another RA.			
Real-time should have been capitalized throughout the standard, and this will be corrected.			
Lynnda Ell; Entergy Services, Inc.; #1	x		Red lining (or otherwise noting) changes to documents is an important process for complete identification of all changes. This should be a requirement when moving from one version of an approved document to the following version of the document for all changes between the two versions. In order to follow the evolution of a procedure, process or plan, appending a summary of all the changes from version one to the current version would be helpful.
The industry commenters did not indicate support for documenting all changes or providing a summary. This does not preclude any entity from doing these things, it just means that NERC will not require this.			
Philip Riley (Group of 8); PSC of SC; #9	x		The PSCSC agrees with the “summary of changes” idea and recommends adding such a requirement to the standard.
The industry commenters did not indicate support for providing a summary. This does not preclude any entity from doing this, it just means that NERC will not require this.			
Michael C. Calimano; NY-ISO; #2		x	
Gerald Rheault; Manitoba Hydro; #1,3,5,6		x	
Robert Coish; MAPP (Group of 9); #2		x	
Roman Carter; SCGEM (Group of 6); #5,6		x	
Marc Butts; Southern Company Services (Group of 5); #1		x	
Darrel W. Richardson; IL Power Co; #1,3		x	
Ed Riley; CA-ISO; #2		x	
Karl Tammar; ISO-RTO (Group of 9);		x	

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#2			
Guy Zito; NPCC – CP9 (Group of 10) #1,2		x	
Peter Burke; ATC; #1		x	
Al DiCaprio; MAAC (Group of 5); #2		x	
Kathleen Goodman; ISO-NE; #2		x	
John Horakh; MAAC; # 2		x	
Peter Henderson / Khaqan Khan; IMO; #2		x	
Raj Rana; AEP; #1,3,6		x	
Joseph C. Fleury; NYSRC;		x	

9. Do you agree with the Compliance Monitoring for 101?

Summary consideration: The SDT removed the language that indicated the self-certification would include a list of the latest approved version of documents distributed to other Reliability Authorities that include notifications, information exchange or the coordination of actions between Reliability Authorities or that addresses Scenarios in the Reliability Authority Area that may impact other Reliability Authority Areas. This language was removed because it would have expanded the scope of what is commonly accepted as 'self-certification'.

In addition, the language describing how the Compliance Monitor would verify compliance (by contacting other RAs) was moved so that this language appears as part of the process of an audit or an investigation upon a complaint, rather than as part of the self-certification process. In cross-referencing the compliance monitoring with the levels of non-compliance, the SDT discovered that the list of evidence to be provided to the Compliance monitor as part of an audit was missing 'evidence of distribution' of the procedures – and the SDT added this.

Commenter	Yes	No	Comments
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6		x	<p>We recommend the reformatting of section (d)(1) for clarity and consistency as follows:</p> <ul style="list-style-type: none"> <li>(i) The Reliability Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually. The self-certification shall include a list of the latest approved version of documents distributed to other Reliability Authorities that require notifications, information exchange or the coordination of actions between Reliability Authorities or that addresses Scenarios in the Reliability Authority Area that may impact other Reliability Authority Areas.</li> <li>(ii) The Compliance Monitor shall also use a scheduled on-site review at least once every three years. The Compliance Monitor shall interview other Reliability Authorities to identify Operating Procedures, Processes or Plans that were distributed to the Reliability Authority being audited to verify that these documents are available for real-time use by the receiving Reliability Authority's system operators</li> <li>(iii) The Compliance Monitor shall conduct an investigation upon a complaint within 30 days of the alleged infraction's discovery date. The Compliance Monitor shall complete the investigation and report back to all involved Reliability Authorities (the Reliability Authority that complained as well as the Reliability Authority that was investigated) within 45 days after the start of the investigation.</li> </ul>

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<p>There are many different ways of presenting this information, and since the industry seems to support the format already used, the SDT did not make the suggested change. We've asked the industry to comment on the technical content of the standard, not the format. David Cook, NERC's VP-Legal Counsel, is providing oversight to the format.</p>			
Al DiCaprio; MAAC (Group of 5); #2		x	<p>Annual Certification is just that – an entity attesting that it is in compliance. The Annual Certification proscribed by this standard is not an attestation as much as it is a mini-audit.</p> <p>Item (d) 3 should state “5 business days” instead of “5 days”.</p>
<p>The self-certification component did include a requirement that would have expanded the scope of what is commonly accepted as 'self-certification'. The SDT removed the language that referenced providing a list of procedures as part of the annual self-certification.</p> <p>Several commenters suggested that '5 days' be changed to '5 business days', and this has been changed.</p>			
Karl Tammar; ISO-RTO (Group of 9); #2			
Michael C. Calimano; NY-ISO; #2	x		Item (d) 3 should state “5 business days” instead of “5 days”.
<p>Several commenters suggested that '5 days' be changed to '5 business days', and this has been changed.</p>			
Kathleen A. Davis (Group of 7); TVA 1	x		would prefer that the “calendar year” be changed to Rolling 12 months
<p>A 'rolling 12 months' is more complex to track – so this change wasn't made.</p>			
Peter Henderson / Khaqan Khan; IMO; #2	x		With regards to standard 101 section d (3), we suggest a change be made to indicate .....5 “ <b>business</b> ” days.
<p>Several commenters suggested that '5 days' be changed to '5 business days', and this has been changed.</p>			
Robert Coish; MAPP (Group of 9); #2	x		
Roman Carter; SCGEM (Group of 6); #5,6	x		
Gerald Rheault; Manitoba Hydro; #1,3,5,6	x		
Marc Butts; Southern Company Services (Group of 5); #1	x		
Darrel W. Richardson; IL Power Co;	x		

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#1,3			
Ed Riley; CA-ISO; #2	x		
Guy Zito; NPCC – CP9 (Group of 10) #1,2	x		
Peter Burke; ATC; #1	x		
Kathleen Goodman; ISO-NE; #2	x		
Scott Moore; SPP ORWG -6)#1,2	x		
John Horakh; MAAC; # 2	x		
Lynnda Ell; Entergy Services, Inc.; #1	x		
Philip Riley (Group of 8); PSC of SC; #9	x		
Raj Rana; AEP; #1,3,6	x		
Joseph C. Fleury; NYSRC; #2	x		



10. Do you agree with the Levels of Non-compliance for 101?

**Summary consideration: Most commenters agreed with the levels of non-compliance, and they were not changed.**

Commenter	Yes	No	Comments
Al DiCaprio; MAAC (Group of 5); #2		x	As long as an entity has a document with a date and a distribution list that entity is compliant even if the document did not address any of the real time problems on its system.
<p>The documents required in this standard provide a tool for system operators to use to facilitate coordination between RAs. Most commenters agreed with this, and requested that this be a focus of this standard. Although having a plan is not a guarantee that the plan is 'good' – RAs that have achieved certification are expected to have the motivation to perform reliably under a wide array of conditions and are expected to put forth a good faith effort in developing documents that are technically sound. The industry did not ask for a requirement that Compliance Monitors evaluate the 'quality' of these documents.</p>			
Philip Riley (Group of 8); PSC of SC; #9		x	The PSCSC must reiterate its view that the approach appears to be compliance-based rather than performance-based. Is the objective having procedures on hand, or a reliable system? The PSCSC maintains that the real objective is reliability, and not readily available procedures. The real measure of success is effective implementation of the procedures such that reliability is not compromised.
<p>The documents required in this standard provide a tool for system operators to use to facilitate coordination between RAs. Most commenters agreed with this, and requested that this be a focus of this standard. Although having a plan is not a guarantee that the plan is 'good' – RAs that have achieved certification are expected to have the motivation to perform reliably under a wide array of conditions and are expected to put forth a good faith effort in developing documents that are technically sound. The industry did not ask for a requirement that Compliance Monitors evaluate the 'quality' of these documents.</p>			
Roman Carter; SCGEM (Group of 6); #5,6  Marc Butts; Southern Company Services (Group of 5); #1	x		section (e) (1) (i) should not include the phrase “distribution list” (at the end of that paragraph)
<p>The standard does require that there be a distribution list and most industry commenters supported retaining this requirement.</p>			
Scott Moore; SPP (ORWG -6)#1,2	x		<p>Change (e)(1)(ii) to read “...action(s) required as a result of other Reliability Authorities’ Operating Procedures, Processes or Plans, ...”</p> <p>Insert “as listed in (a) at the end of (e)(4)(ii).</p>

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We've asked the industry to comment on the technical content of the standard, not the format. David Cook, NERC's VP-Legal Counsel, is providing oversight to the format.			
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6	x		In (i) for Level One should include the word "a" as indicated "...to support interconnection reliability do not include a version control number or date, and a distribution list, or ..."
The suggested change was implemented.			
Michael C. Calimano; NY-ISO; #2	x		
Gerald Rheault; Manitoba Hydro; #1,3,5,6	x		
Robert Coish; MAPP (Group of 9); #2	x		
Darrel W. Richardson; IL Power Co; #1,3	x		
Ed Riley; CA-ISO; #2	x		
Karl Tammar; ISO-RTO (Group of 9); #2	x		
Guy Zito; NPCC – CP9 (Group of 10) #1,2	x		
Peter Burke; ATC; #1	x		
Kathleen A. Davis (Group of 7); TVA #1	x		
Kathleen Goodman; ISO-NE; #2	x		
John Horakh; MAAC; # 2	x		
Lynnda Ell; Entergy Services, Inc.; #1	x		
Peter Henderson / Khaqan Khan; IMO; #2	x		
Raj Rana; AEP; #1,3,6	x		

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Joseph C. Fleury; NYSRC; #2	x		
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11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

**Summary consideration: Most commenters agreed with this change so additional changes were not made.**

Commenter	Yes	No	Comments
Ed Riley; CA-ISO; #2		x	Conference calls should be daily and conducted by the real-time personnel that would be using conference calls to notify other RA's of adverse system conditions.
<p><b>Most commenters did not support having daily calls – there is nothing in the standard that precludes RAs from having daily calls if this is what they agree to.</b></p>			
Gerald Rheault; Manitoba Hydro; #1,3,5,6	x		Daily calls could be a burden on the operators but it definitely would be desirable that there be a call once a week at the very least and more frequently if agreed to by all RAs involved.
<p><b>Agreed.</b></p>			
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6	x		<p>We have no trouble with the idea of weekly conference calls. However, conference calls with an adjacent Reliability Authority may be handled with a normal everyday phone. We are not sure what kind of testing this would need. If the conference call is intended to utilize some other system such as a conference bridge, hotline, satellite phone or other communication forum as mentioned, then this weekly testing may be very important. Does there need to be some further clarification of what is really meant?</p> <p>In Measure (b)(4), "... the Reliability Authority shall provide the Compliance Monitor with evidence that the requested reliability related information was provided to other Reliability Authorities..." For clarity, examples of the type of evidence should be provided.</p>
<p><b>The 'testing' of the communication system is a side-benefit of periodic calls – the standard does not require periodic 'testing' of the communication system – and the standard doesn't specify what type of communication system(s) are to be used.</b></p>			
<p><b>Evidence can be anything you want to use – providing examples in the standard may limit the interpretation of what may be 'evidence' – and the intent was to make this as inclusive as possible.</b></p>			
Darrel W. Richardson; IL Power Co; #1,3	x		We agree with the intent but think that there should be something that would trigger calls on a more often basis (i.e., weather/temperature, reserve margin level, etc).

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<p>Requirement 101 requires that the RA have a communications procedure and Requirement 102 states that you follow the procedure from 101 to make notifications and exchange data with other RAs – and for conditions that aren't foreseen so that they aren't identified in the communication procedure required in 101, the RAs follow Requirement 103.</p>			
Scott Moore; SPP (ORWG -6)#1,2	x		A weekly call is appropriate, however; it needs to be extended to all RAs with whom the initiating RA shares operating procedures, processes or plans not just those adjacent RAs.
<p>The standard does not preclude the inclusion of additional RAs in periodic conference calls – however this standard doesn't require their inclusion because their inclusion may not be relevant for all conditions.</p>			
Michael C. Calimano; NY-ISO; #2	x		
Robert Coish; MAPP (Group of 9); #2	x		
Roman Carter; SCGEM (Group of 6); #5,6	x		
Marc Butts; Southern Company Services (Group of 5); #1	x		
Karl Tammar; ISO-RTO (Group of 9); #2	x		
Guy Zito; NPCC – CP9 (Group of 10) #1,2	x		
Peter Burke; ATC; #1	x		
Kathleen A. Davis (Group of 7); TVA #1	x		
Al DiCaprio; MAAC (Group of 5); #2	x		
Kathleen Goodman; ISO-NE; #2	x		
John Horakh; MAAC; # 2	x		
Lynnda Ell; Entergy Services, Inc.; #1	x		
Peter Henderson / Khaqan Khan; IMO; #2	x		

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Philip Riley (Group of 8); PSC of SC; #9	x		
Raj Rana; AEP; #1,3,6	x		
Joseph C. Fleury; NYSRC; #2	x		

12. Do you agree with the Compliance Monitoring for 102?

Summary consideration: Most commenters agreed with this section. Several commenters suggested '5 days' be changed to '5 business days' and this change was made.

Commenter	Yes	No	Comments
Roman Carter; SCGEM (Group of 6); #5,6  Marc Butts; Southern Company Services (Group of 5); #1			Formal notifications to reveal a particular event may need to be documented but not routine communications in which system has no abnormalities.
The documentation may be as simple as an audio tape or a log entry.			
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6		x	We recommend the reformatting of section (d)(1) for clarity and consistency as follows:  (i) The Reliability Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually.  (ii) The Compliance Monitor shall also use a scheduled on-site review at least once every three years and investigations upon complaint. The Compliance Monitor shall interview other Reliability Authorities within the Interconnection and verify that the Reliability Authority being audited has been making notifications and exchanging reliability related information according to approved procedures.  (iii) The Compliance Monitor shall conduct an investigation upon a complaint within 30 days of the alleged infraction's discovery date. The Compliance Monitor shall complete the investigation and report back to all involved Reliability Authorities (the Reliability Authority that complained as well as the Reliability Authority that was investigated) within 45 days after the start of the investigation.
There are many different ways of presenting this information, and since the industry seems to support the format already used, the SDT did not make the suggested change. We've asked the industry to comment on the technical content of the standard, not the format. David Cook, NERC's VP-Legal Counsel, is providing oversight to the format.			

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Al DiCaprio; MAAC (Group of 5); #2		x	Maintaining 12 months of tape records is excessive. Item (d) 3 should state "5 business days" instead of "5 days".
Most entities supported keeping the documentation for a rolling 12 months so this wasn't changed.			
Michael C. Calimano; NY-ISO; #2 Karl Tammar; ISO-RTO (Group of 9); #2		x	Item (d) 3 should state "5 business days" instead of "5 days".
Several entities suggested changing '5 days' to '5 business days' and this change was made to the standard.			
Peter Henderson / Khaqan Khan; IMO; #2		x	With regards to standard 102 section d (3), we suggest a change be made to indicate .....5 " <b>business</b> " days.
Several entities suggested changing '5 days' to '5 business days' and this change was made to the standard.			
Gerald Rheault; Manitoba Hydro; #1,3,5,6		x	
Robert Coish; MAPP (Group of 9); #2		x	
Darrel W. Richardson; IL Power Co; #1,3		x	
Ed Riley; CA-ISO; #2		x	
Guy Zito; NPCC – CP9 (Group of 10) #1,2		x	
Peter Burke; ATC; #1		x	
Kathleen A. Davis (Group of 7); TVA #1		x	
Kathleen Goodman; ISO-NE; #2		x	
Scott Moore; SPP ORWG -6)#1,2		x	
John Horakh; MAAC; # 2		x	



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Lynnda Ell; Entergy Services, Inc.; #1	x		
Philip Riley (Group of 8); PSC of SC; #9	x		
Raj Rana; AEP; #1,3,6	x		
Joseph C. Fleury; NYSRC; #2	x		

13. Do you agree with the Levels of Non-compliance for 102?

Summary consideration: The levels of non-compliance have been modified – a level 2 has been added to address the situation where notifications were not made in accordance with a procedure and there were no adverse reliability impacts– and level 4 has been modified to reflect the situation where notifications were not made in accordance with a procedure and there were adverse reliability impacts.

Commenter	Yes	No	Comments
Al DiCaprio; MAAC (Group of 5); #2		x	The specified Levels of Non-Compliance do not logically follow. A failure to Call participants is a Level 1, whereas by-passing a step in a procedure is a level 4.
Agreed. The levels of non-compliance have been modified – a level 2 has been added to address the situation where notifications were not made in accordance with a procedure and there were no adverse reliability impacts– and level 4 has been modified to reflect the situation where notifications were not made in accordance with a procedure and there were adverse reliability impacts.			
Roman Carter; SCGEM (Group of 6); #5,6 Marc Butts; Southern Company Services (Group of 5); #1	x		As written, level 3 appears to be worse than level 4. Maybe rewording would help clarify that violating 4 is more severe than violating 3.
Agreed. The levels were modified to clarify the intent. Level 4 is now clearly the most severe violation.			
Darrel W. Richardson; IL Power Co; #1,3	x		However, it would seem that there should be some “forgiveness” when non-participation occurs due to emergency situations.
Its up to each RA to have sufficient staff on hand at all times to ensure that there are enough people to manage all critical tasks. NERC's Legal Counsel advised that we not include 'disclaimers' in the standards to indicate that the standards aren't applicable under emergency conditions.			
Michael C. Calimano; NY-ISO; #2	x		
Gerald Rheault; Manitoba Hydro; #1,3,5,6	x		
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6	x		
Robert Coish; MAPP (Group of 9); #2	x		
Ed Riley; CA-ISO; #2	x		

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Karl Tammar; ISO-RTO (Group of 9); #2	x		
Guy Zito; NPCC – CP9 (Group of 10) #1,2	x		
Peter Burke; ATC; #1	x		
Kathleen A. Davis (Group of 7); TVA #1	x		
Kathleen Goodman; ISO-NE; #2	x		
John Horakh; MAAC; # 2	x		
Lynnda Ell; Entergy Services, Inc.; #1	x		
Peter Henderson / Khaqan Khan; IMO; #2	x		
Philip Riley (Group of 8); PSC of SC; #9	x		
Raj Rana; AEP; #1,3,6	x		
Joseph C. Fleury; NYSRC; #2	x		

14. Do you agree with this change to Requirement 103?

**Summary consideration:** The requirement was modified to clarify that this requirement is applicable to an array of situations:

- Where there is one problem and the RAs can't agree that the problem exists
- Where there is one problem and the RAs can't agree on the nature of the problem, and
- Where there are multiple problems and there is disagreement on which problem(s) exist.

Commenter	Yes	No	Comments
Michael C. Calimano; NY-ISO; #2 Peter Henderson / Khaqan Khan; IMO; #2	x		Change 103.1.ii.B to the following:  If time does not permit, then each RA shall operate as though the <b>worse case</b> problem exists until the conflicting system status is resolved.
<p>Instead of adopting the exact words you suggested, we adopted the concept and modified the standard to address an array of situations - where there is one problem and the RAs can't agree that the problem exists, where there is one problem, but the RAs can't agree on the nature of the problem - and the situation where there are multiple problems and there is disagreement on which problem(s) exist.</p>			
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6	x		<p>The changes to this requirement are more clear than the 1<sup>st</sup> Posting of the Standard, but now more clarity must be provided in which entity determines which approach is "more conservative". What is conservative for one system, may not be conservative for the other.</p> <p>In addition, for clarity, we recommend revising Requirement (a)(1)(i) as follows: If the involved Reliability Authorities agree on the problem and the actions to take to prevent or mitigate the system condition each involved Reliability Authority shall implement the agreed-upon solution, and notify the involved Reliability Authorities <i>upon completion of the actions.</i></p>
<p>Since all RAs are created equal under the Functional Model, the SDT did not give any one RA the authority to choose the most conservative solution.</p> <p>Although the exact wording you suggested wasn't used, the concept of your suggestion was adopted and is reflected in the revised standard.</p>			
Darrel W. Richardson; IL Power Co; #1,3	x		<p>However, we believe that a step should be added in between 103 (a) (1) (ii) (A) and 103 (a) (1) (ii) (B). The step would read "If the RA contending there is a problem has a reasonable solution which does not require the action of the RA disagreeing a problem exists, the RA contending the problem exists will implement this solution". The present 103 (a) (1) (ii) (B) should become 103 (a) (1) (ii) (C) and read "If the RA contending a problem exists has no solution which does not require the actions of</p>

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		the disagreeing RA or has already taken all reasonable actions to resolve the problem themselves, then each RA shall operate as though the problem exists until the conflicting system status is resolved”.
<p>Requirement 103 was intended to address scenarios where more than one RA needs to coordinate actions to resolve a situation. If the situation can be resolved without any assistance or cooperation from other RAs, then it is not addressed by Requirement 103.</p> <p>The standard already contains language to address scenarios where the involved RAs either disagree on the problem(s) or the solution(s).</p>		
Karl Tammar; ISO-RTO (Group of 9); #2	x	If time does not permit, then each RA shall operate as though the <b>worse case</b> problem exists until the conflicting system status is resolved.
<p>Instead of adopting the exact words you suggested, we adopted the concept and modified the standard to address an array of situations - where there is one problem and the RAs can't agree that the problem exists, where there is one problem, but the RAs can't agree on the nature of the problem - and the situation where there are multiple problems and there is disagreement on which problem(s) exist.</p>		
Roman Carter; SCGEM (Group of 6); #5,6 Marc Butts; Southern Company Services (Group of 5); #1	x	In 103 (a) (1) (iii) we are not exactly sure what the term “more conservative” means. This could be interpreted differently by neighboring RAs.
<p>The most conservative solution is the solution that would provide the greatest preservation of interconnected system reliability while also having the greatest impact on resolving the problem.</p>		
Kathleen A. Davis (Group of 7); TVA #1	x	The notion of what is “conservative” could be different for different systems (data and models can be off). Implementation will be problematic.  Cannot agree on the solution “the more conservative solution shall be implemented.” This requirement should only apply regarding conditions involving a potential IROL violation or EEA Level 3 condition.
<p>The most conservative solution is the solution that would provide the greatest preservation of interconnected system reliability while also having the greatest impact on resolving the problem.</p> <p>The standard wasn't designed to be limited to just IROLS and EEAs, it could involve things such as cyber attacks or hurricanes or other types of problems.</p>		
Scott Moore; SPP (ORWG -6)#1,2	x	The expectation that the RAs will be able to agree on the most conservative solution may be equally unattainable as is agreement on the problem and appropriate solution.
<p>Agreed.</p>		

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Gerald Rheault; Manitoba Hydro; #1,3,5,6	x		
Robert Coish; MAPP (Group of 9); #2	x		
Ed Riley; CA-ISO; #2	x		
Guy Zito; NPCC – CP9 (Group of 10) #1,2	x		
Peter Burke; ATC; #1	x		
Al DiCaprio; MAAC (Group of 5); #2	x		
Kathleen Goodman; ISO-NE; #2	x		
John Horakh; MAAC; # 2	x		
Lynnda Ell; Entergy Services, Inc.; #1	x		
Philip Riley (Group of 8); PSC of SC; #9	x		
Raj Rana; AEP; #1,3,6	x		
Joseph C. Fleury; NYSRC; #2	x		

15. Do you agree with the Compliance Monitoring for 103?

Summary consideration: The language that indicated entities found non-compliant would be subject to re-audit every 90 days until found fully compliant has been removed from the standard on the advice of NERC’s VP-Compliance. This language may have conflicted with language in Regional compliance programs.

Commenter	Yes	No	Comments
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6		x	<p>We recommend the reformatting of section (d)(1) for clarity and consistency as follows:</p> <ul style="list-style-type: none"> <li>(i) The Reliability Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually.</li> </ul> <p>The Compliance Monitor shall use a scheduled on-site review at least once every three years. The Compliance Monitor shall interview other Reliability Authorities within the Interconnection and verify that the Reliability Authority being audited has been coordinating actions to prevent or resolve potential, expected or actual problems that adversely impact the Interconnection.</p> <ul style="list-style-type: none"> <li>(iii) The Compliance Monitor shall conduct an investigation upon a complaint that is received within 30 days of an alleged infraction’s discovery date. The Compliance Monitor shall complete the investigation and report back to all involved Reliability Authorities (the Reliability Authority that complained as well as the Reliability Authority that was investigated) within 45 days after the start of the investigation.</li> </ul> <p>See our comment in the beginning of this form. We did not include the last sentence “Entities found non-compliant shall be subject to re-audit every 90 days until found fully compliant” since we do not think it is appropriate.</p>
<p>There are many different ways of presenting this information, and since the industry seems to support the format already used, the SDT did not make the suggested change. We’ve asked the industry to comment on the technical content of the standard, not the format. David Cook, NERC’s VP-Legal Counsel, is providing oversight to the format.</p>			
<p>The reference to “re-audit every 90 days” was dropped from this standard.</p>			
Gerald Rheault; Manitoba Hydro; #1,3,5,6	x		<p>A comment relative to “re-audit every 90 days” contained in question 2 is applicable to this compliance monitoring process. If the entity which was judged non-compliant does not improve, a further complaint will be filed triggering a new investigation. Therefore requiring 90 day review is not necessary.</p>

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<b>The reference to “re-audit every 90 days” was dropped from this requirement.</b>			
Roman Carter; SCGEM (Group of 6); #5,6 Marc Butts; Southern Company Services (Group of 5); #1	x		Not clear how to document which solution is ‘more conservative’.
<b>The standard doesn’t require that you document the most conservative solution – but does require that you have evidence to show coordination with other RAs.</b>			
Kathleen A. Davis (Group of 7); TVA #1	x		change calendar year to rolling 12 months
<b>A ‘rolling 12 months’ is more complex to track – so this change wasn’t made.</b>			
Robert Coish; MAPP (Group of 9); #2	x		
Michael C. Calimano; NY-ISO; #2	x		
Darrel W. Richardson; IL Power Co; #1,3	x		
Ed Riley; CA-ISO; #2	x		
Karl Tammar; ISO-RTO (Group of 9); #2	x		
Guy Zito; NPCC – CP9 (Group of 10) #1,2	x		
Peter Burke; ATC; #1	x		
Al DiCaprio; MAAC (Group of 5); #2	x		
Kathleen Goodman; ISO-NE; #2	x		
Scott Moore; SPP ORWG -6)#1,2	x		
John Horakh; MAAC; # 2	x		
Lynnda Ell; Entergy Services, Inc.; #1	x		



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Peter Henderson / Khaqan Khan; IMO; #2	x		
Philip Riley (Group of 8); PSC of SC; #9	x		
Raj Rana; AEP; #1,3,6	x		
Joseph C. Fleury; NYSRC; #2	x		

16. Do you agree with the Levels of Non-compliance for 103?

**Summary consideration: Most commenters agreed with the levels of non-compliance as proposed, so no changes were made.**

Commenter	Yes	No	Comments
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6		x	The levels of non-compliance need to be more specific to the requirements and measures. The levels as written are too broad. Perhaps Level 1 could be they did not notify upon completion of actions. Level 2 could still be N/A. Level 3 could be they did not operate as if the problem existed until a conflict was resolved. And Level 4 could be they did not operate to the most reliable (conservative) state when they could not agree.
<b>Most commenters agreed with the levels of non-compliance as proposed, so no changes were made.</b>			
Michael C. Calimano; NY-ISO; #2	x		The explanation of Level 1 needs to be clearer to indicate that the coordination activity was completed but the documentation was not.  A distinction between “potential” and “expected” events needs to be defined.
<b>A potential event is one that could occur – you may have a hurricane hit the east coast sometime this year – an expected event is one that is likely to occur – a hurricane’s course is known and will probably strike your facilities – but it could change course.</b>			
Peter Henderson / Khaqan Khan; IMO; #2	x		Distinction between “potential” and “expected” events should be clarified.
<b>A potential event is one that could occur – you may have a hurricane hit the east coast sometime this year – an expected event is one that is likely to occur – a hurricane’s course is known and will probably strike your facilities – but it could change course.</b>			
Gerald Rheault; Manitoba Hydro; #1,3,5,6	x		
Robert Coish; MAPP (Group of 9); #2	x		
Roman Carter; SCGEM (Group of 6); #5,6	x		
Marc Butts; Southern Company Services (Group of 5); #1	x		
Darrel W. Richardson; IL Power Co; #1,3	x		

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Ed Riley; CA-ISO; #2	x		
Karl Tammar; ISO-RTO (Group of 9); #2	x		
Guy Zito; NPCC – CP9 (Group of 10) #1,2	x		
Peter Burke; ATC; #1	x		
Kathleen A. Davis (Group of 7); TVA #1	x		
Al DiCaprio; MAAC (Group of 5); #2	x		
Kathleen Goodman; ISO-NE; #2	x		
Scott Moore; SPP ORWG -6)#1,2	x		
John Horakh; MAAC; # 2	x		
Lynnda Ell; Entergy Services, Inc.; #1	x		
Philip Riley (Group of 8); PSC of SC; #9	x		
Raj Rana; AEP; #1,3,6	x		
Joseph C. Fleury; NYSRC; #2	x		

17. Do you think there is a need for a Technical Reference to support this standard?

**Summary consideration: Most commenters indicated there is no need for a Technical Reference to support this standard, so the SDT will not develop one and will not recommend that one be developed.**

Commenter	Yes	No	Comments
Peter Henderson / Khaqan Khan; IMO; #2			Only if there are complex or controversial topics that require further explanation.
No industry commenters suggested any technical topics that should be included in a technical reference. The only suggestion provided was to add more definitions, and definitions are not included in a standard-specific technical reference.			
Kathleen A. Davis (Group of 7); TVA #1	x		definitions and clarification for terms. “conservative solution”...give examples that reflect different operating philosophies.
Definitions are not included in a technical reference.			
Michael C. Calimano; NY-ISO; #2	x		
Gerald Rheault; Manitoba Hydro; #1,3,5,6		x	This Standard is primarily of an administrative nature therefore a technical reference would not serve a useful purpose.
Agreed.			
Guy Zito; NPCC – CP9 (Group of 10) #1,2 Kathleen Goodman; ISO-NE; #2 Joseph C. Fleury; NYSRC;		x	NPCC (ISO-NE; NYSRC) suggests that the drafting team ensure all the necessary attributes pertaining to this standard appear in the standard and not in any companion document.
All new standards are expected to include all necessary details to ensure that industry participants understand what performance is expected, and how that performance will be measured for compliance. There are some standards under development, such as the Balance Resources and Demand standard, that are much more technical, and may need further clarification to explain how the requirements were developed.			
Peter Burke; ATC; #1		x	This standard in its existing draft has been written in a way that a technical reference is not required.
Agreed.			

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Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6		x	
Robert Coish; MAPP (Group of 9); #2		x	
Roman Carter; SCGEM (Group of 6); #5,6		x	
Marc Butts; Southern Company Services (Group of 5); #1		x	
Darrel W. Richardson; IL Power Co; #1,3		x	
Ed Riley; CA-ISO; #2		x	
Karl Tammar; ISO-RTO (Group of 9); #2		x	
Al DiCaprio; MAAC (Group of 5); #2		x	
Scott Moore; SPP ORWG -6)#1,2		x	
John Horakh; MAAC; # 2		x	
Lynnda Ell; Entergy Services, Inc.; #1		x	
Philip Riley (Group of 8); PSC of SC; #9		x	
Raj Rana; AEP; #1,3,6		x	

18. Are you aware of any Regional or Interconnection Differences that should be added to this standard?

**Summary consideration: No Regional or Interconnection Differences were identified.**

Commenter	Comments
Joseph C. Fleury; NYSRC; #2	<p>The NYSRC Reliability Rules are not inconsistent with or less stringent than the proposed NERC Standard, and the NYSRC has elected <u>not</u> to propose that NYSRC Reliability Rules be made part of this Reliability Standard.</p> <p>It is the NYSRC's position that (1) NERC specifies minimum standards, (2) a Region may establish more stringent standards for its members separate from the NERC standards, and (3) it is unnecessary to include these more stringent standards within the framework of the NERC standards.</p>
<p><b>Agreed. However, the Standards Development Process does not prevent a Region from requesting inclusion of more stringent Regional Standards within the framework of the NERC standards.</b></p>	
<p>Roman Carter; SCGEM (Group of 6); #5,6</p> <p>Marc Butts; Southern Company Services (Group of 5); #1</p>	<p>We do not currently know of any Regional differences at this time. However, during the initial phasing-in of standards, each region may find adopting or developing a different approach provides increased reliability. Therefore, we believe that differences should be considered as they are identified in the future.</p>
<p><b>The Standards Development Process requires that Regional Differences be considered and approved as part of the standard. If a Regional Difference is identified after a standard has been approved, then a SAR will be needed to see if there is industry support for modifying the already-approved standard to include the Regional Difference.</b></p>	
Gerald Rheault; Manitoba Hydro; #1,3,5,6	<p>There are no Regional or Interconnection Differences that should be added to this Standard that Manitoba Hydro is aware of.</p>
Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6	<p>We are not aware of any Regional or Interconnection Differences that should be added to this standard.</p>

19. Other comments on this standard

Summary consideration:

<p>Patti Metro; FRCC (Group of 20); #1,2,3,4,5,6</p>	<p>We continue to have the concern that this Standard only applies to coordination between RA's. We have commented on this in previous postings, and the consideration to the comments state that there is not industry consensus to address all coordination. However, the drafting team stated they have advised the OC on the possible need for additional SARs to address coordination between other entities. Is the drafting team convinced there is industry consensus to limit to RA's only? We saw other commenters on the last posting with the same concern? At the very least, it would seem that the Operating Procedures, Processes and Plans of the RA should be required to describe the relationships and coordination role with not just other RA's, but the BA's, TOP's, TP's, IA's and PA's relevant to the RA's footprint.</p> <p>The SDT is working to develop a standard that is within the scope of the associated SAR. The SAR was limited to RA to RA coordination – the only 'Function' identified (within the SAR) as having any responsibility for compliance was the RA. If another Standard is needed to address coordination between lower level functions, then another SAR will need to be developed. Other standards are expected to address the RA's coordination with the entities within its footprint – this includes standards such as the Balance Resources and Demand standard and the IROL standard.</p> <p>We also offer to following comments noted below. These are excerpts from the Standard with questions/comments provided in italics</p> <p><b>Purpose:</b> To ensure that each Reliability Authority's operations are coordinated such that they will not have an adverse impact on the reliability of other Reliability Authority and to preserve the reliability benefits of interconnected operations.</p> <p><i>Shouldn't the purpose be the reliability of the Reliability Authority's area not the reliability of the Reliability Authority? If this is correct the purpose should be revised as follows: "...on the reliability of other Reliability Authority Areas and to preserve ..."</i></p> <p>The word, "Areas" was added to the purpose statement as suggested.</p> <p><b>Applicability:</b> This standard applies to entities performing the Reliability Authority function, as identified in NERC's Functional Model. NERC is now developing standards and procedures for the identification and certification of such entities. Until that identification and certification is complete, these standards apply to the existing entities (such as control areas and reliability coordinators) that are currently performing the defined functions.</p>
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	<p><i>In Version 2 of the Functional Model approved by the NERC BOT in February 2004, the Reliability Authority is the entity that is performing the Operating Reliability Function. Therefore the applicability portion of the standard should be revised to reflect this change.</i></p> <p>In this standard, the term “Reliability Authority” refers to the entities performing this function as defined in the Functional Model.                  Since this statement is redundant with the first sentence of the Applicability portion of the standard it can be deleted.</p>
<p>The entity is the Reliability Authority, and this is properly identified in the standard.</p> <p>The redundant sentence has been removed.</p>	
<p>Marc Butts; Southern Company Services (Group of 5); #1</p>	<p>We realize that this is a difficult subject to put into words but it does not appear to be a “crisp” standard as has been the recent buzzword regarding standards.</p>
<p>The SDT needs to have specific suggestions for changes.</p>	
<p>Guy Zito; NPCC – CP9 (Group of 10) #1,2                  Kathleen Goodman; ISO-NE; #2</p>	<p>Standard statement about opposition to Monetary sanctions.</p> <p>We support Mr. Gent’s comments to the NERC BOT that monetary sanctions are ineffective to ensure compliance and that market mechanisms and letters of increasing severity are more effective.</p> <p>There is an issue with the concept of inclusion of a monetary sanction matrix and what its implications are. NPCC has expressed concern over its inclusion and maintains that the use of market mechanisms where possible, as well as, letters of increasing degrees of severity and notifications to regulatory agencies are more effective in ensuring compliance. Failure of NERC to gain authority through reliability legislation could result in NERC pursuing actions to implement “Plan B,” a “voluntary” approach affording NERC the authority to perform these types of monetary sanctions. NPCC has indicated that any posted Standard, with such a matrix, will not be supported by NPCC, or its members. There are, however, proceedings at NERC by the Compliance Certification Committee (CCC) to address alternative sanction proposals and NPCC will continue to work to oppose monetary sanctions.</p> <p>In addition the NPCC Compliance Sanction Alternative study provides evidence that supports the above.</p>
<p>Addressing financial sanctions is outside the scope of the SDT. The Director-Standards has been advised that there are many entities opposed to financial sanctions.</p>	



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<p>Joseph C. Fleury; NYSRC; #2</p>	<p>The NYSRC is opposed to monetary sanctions as the only option for dealing with noncompliance as applied in this and other proposed NERC Standards. Unfortunately, direct monetary sanctions invite “gaming the system”, and encourage “business” decisions based on potential profits or savings versus potential penalties. Instead of monetary sanctions, the NYSRC prefers that NERC have the authority to issue letters of increasing degrees of severity to communicate noncompliance of mandatory standards. The NYSRC and NPCC now rely on a more stringent and mandatory process than monetary sanctions to assure compliance with reliability standards. Compliance is now mandatory through the contractual agreements and tariffs that all participants need in order to conduct business. The use by the NYSRC and NPCC of letters to regulatory agencies and other oversight bodies for reporting noncompliance has demonstrated that letter sanctions are a more effective tool for ensuring adherence to standards. Such letters establish the basis for liability in the event of a subsequent criterion violation, and in the case of market participant noncompliance, threaten the violator’s ability to do business with or through an ISO or RTO. Moreover, letters that communicate noncompliance best allow focus on the “root cause” of a violation, as well as its reliability impact.</p> <p>Therefore, the NYSRC recommends that this and other NERC Standards expressly provide that letter sanctions be used in addition to or instead of monetary sanctions under circumstances in which they would be an equally or more effective enforcement mechanism.</p>
<p>Addressing financial sanctions is outside the scope of the SDT. The Director-Standards has been advised that there are many entities opposed to financial sanctions.</p>	
<p>Scott Moore; SPP ORWG -6)#1,2</p>	<p>When the term Reliability Authority is used it should be written out completely instead of abbreviated to RA as it is in some places in 103.</p> <p>Doesn’t FERC need to be included in the distribution list for the letters in the Sanction Matrix section of the standard?</p> <p>Also in the Sanction Matrix section of the standard, noncompliance should hyphenated like it is in the rest of the standard or either the standard language needs to be changed to match the usage here.</p> <p>The SDT is to be congratulated on the effort that they have put into this version of the standard. It shows a considerable amount of improvement from the first draft.</p>
<p>The revised standard does not use any acronyms.</p> <p>The SDT does not have the authority to revise the Sanctions Matrix. We suggest you submit your suggestion to the VP, Director-Compliance.</p>	

**Consideration of Comments on Second Posting of Coordinate Operations Standard**

<p>Lynnda Ell; Entergy Services, Inc.; #1</p>	<p>The example in the definition of Operating Procedure is incomplete. The definition for Operating Procedure has three basic parts (1) specific task(s) (2) specific goal(s) and (3) specific position(s). The example includes #1 (list of steps) and #2 (remove transmission line) but not #3 (a “position” to perform the task). The example could be changed to read: <b>“A document that lists the specific steps <u>for a system dispatcher</u> to take in removing a specific transmission line from service is an example of an Operating Procedure.”</b></p> <p><b>Grammar:</b> The Purpose should be changed as shown: “To ensure that each Reliability Authority’s operations are coordinated such that they will not have an adverse impact on the reliability of other Reliability <u>Authorities</u> and to preserve the reliability benefits of interconnected operations.”</p> <p><b>Consistency:</b> Only in part 103(a) is the abbreviation “RA” used. This should be changed to be consistent with the remainder of the standard.</p>
<p>The example provided in the definition of an operating procedure was revised as suggested.</p> <p>The purpose statement was revised as follows:</p> <p>To ensure that each Reliability Authority’s operations are coordinated such that they will not have an Adverse Reliability Impact on other Reliability Authority Areas and to preserve the reliability benefits of interconnected operations.</p> <p>The revised standard does not use any acronyms.</p>	
<p>Peter Henderson / Khaqan Khan; IMO; #2</p>	<p>We support this standard as well as the comments submitted by ISO/RTO Standards Review Committee.</p>
<p>The SDT thanks you for your support of this standard.</p> <p>Please see the SDT’s response to the comments submitted by the ISO/RTO Standards Review Committee.</p>	