

Comment Form – Coordinate Operations Drafting Team’s Proposed Implementation Plan & Recommended changes to Version 0 Standards

Please use this form to submit comments on the Coordinate Operations Drafting Team’s proposed Implementation Plan and recommendations for retirement or revision to Version 0 Standards. Comments must be submitted by **August 8, 2005**. You must submit the completed form by emailing it to sarcomm@nerc.com with the words “Implementation Plan Coord Ops Standard Comments” in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or 609.452.8060.

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Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Narinder K. Saini	
Organization:	Entergy Services Inc.	
Telephone:	870-543-5420	
Email:	nsaini@entergy.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

Coordinate Operations Standard Drafting Team has considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Clean version of the 3rd draft of the Coordinate Operations Standards
- Implementation Plan
- Red Line version of Version 0 Standards recommended for retirement or revision

The Drafting Team feels that there is consensus on the content of these standards and wants to move the standards forward for balloting. As an interim step, the Standards Authorization Committee asked the Drafting Team to solicit feedback on its recommendations for retirement or revision of Version 0 standards and on the Implementation Plan. The Drafting Team is recommending the following changes to Version 0 Standards coincident with the implementation of the Coordinate Operations Standards:

- COM-002-0 Communications and Coordination
 - Modify R2; retire R2.1, R2.2, R2.3

- EOP-002-0 Capacity and Energy Emergencies
 - Modify R2; retire R4

- IRO-003-0 Reliability Coordination – Wide Area View
 - Retire R2

- IRO-004-0 Reliability Coordination – Operations Planning
 - Retire R6; modify R7

- IRO-005-0 Reliability Coordination – Current Day Operations
 - Modify R7, R9, R11, R12, R15

- TOP-005-0 Operational Reliability Information
 - Modify R3

The Coordinate Operations Standard Drafting Team’s Implementation Plan includes full compliance within 9 months from the effective date. Thus, if the Board of Trustees adopts the standards on November 1, the standards would become effective on January 1, 2006 and entities would have until October 1, 2006 to achieve full compliance.

The Drafting Team’s reasoning for the above recommendations are included in the Implementation Plan for this set of standards. Please read the Implementation Plan and respond to the questions to let the Drafting Team know if you support its recommendations.

Note that the Standards Authorization Committee directed the drafting team to change the term, ‘Reliability Authority’ to ‘Reliability Coordinator’ in this set of proposed standards. This change should make the standards easier to implement. In addition, the numbering of the standards was changed from the “TOP” prefix (Transmission Operations) to the “IRO” prefix (Interconnection Reliability Operations and Coordination).

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with modifying Reliability Standard COM-002-0_R2 and retiring COM-002-0_R2.1, R2.2, R2.3 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments: Requirements R2, R2.1, R2.2, and R2.3 of COM-002-0 deal with communication between Balancing Authorities and Transmission Operators with their Reliability Coordinators, whereas, the Coordinate Operations standards (IRO-014-1 and IRO-015-1) are applicable to Reliability Coordinators for communication with other Reliability Coordinators. If the responsibility of communication using the Interconnection-wide telecommunication system is assigned to Reliability Coordinator, the Requirement R2 should be modified to reflect that the Reliability Coordinator conveys the information and Requirements R2.1, R2.2, and R2.3 should be retained as these are applicable to Balancing Authorities and Transmission Operators.

Entergy suggests the following words be added to R2 "...conveyed to others in the Interconnection by the Reliability Coordinator via an...".

- 2. Do you agree with modifying Reliability Standard EOP-002-0_R2 and retiring EOP-002-0_R4 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 3. The ‘concept’ contained in EOP-002-0_R9 is covered in proposed IRO-014-1_R1.1.2 and IRO-015-1_R1. EOP-002-0_9 requires the Reliability Coordinator to initiate an Energy Emergency Alert under certain conditions – IRO-014-1 and IRO-015-1 require the Reliability Coordinator to have an energy emergency plan and to make notifications to other Reliability Coordinators according to that energy emergency plan, but the proposed standards don’t include any specific references to use of the Energy Emergency Alerts. The Drafting Team recommends**

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leaving EOP-002-0_R9 intact because removing that requirement would leave a ‘hole’ in EOP-002-0. Do you agree with the Drafting Team that EOP-002-0_R9 should remain in EOP-002-0?

- Yes
- No

Comments: Requirement R9 of EOP-002 is more specific addressing initiation of Energy Emergency Alert whereas the proposed standards are more general requirements for development of plans.

4. Do you agree with retiring IRO-003-0_R2 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.

- Yes
- No

Comments:

5. Do you agree with retiring IRO-004-0_R6 and modifying IRO-004-0_R7 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.

- Yes
- No

Comments: Entergy agrees with retirement of IRO-004-0_R6. Modification of IRO-004-0_R7 is not necessarily as a result of implementation of Coordinate Operations Standard but is a nice improvement. Therefore, Entergy agrees with this modification.

6. Do you agree with modifying Reliability Standard IRO-005-0_R7, IRO-005-0_R9, IRO-005-0_R11, IRO-005-0_R12 and IRO-005-0_R15 coincident with the implementation of the Coordinate Operations Standards?

- Yes
- No

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Comments: Entergy agrees with the modification of Reliability Standard IRO-005-0_R7, IRO-005-0_R9 and IRO-005-0_R12. However, Entergy does not agree with modification of IRO-005-0_R11, All of these requirements in R11 address specific conditions for which Reliability Coordinator should take action. Entergy suggests leaving Requirement IRO-005-0_R11 as it is, or, moving the deleted words from R11 into IRO-016-1_R1 as follows: "...other Reliability Coordinators (e.g. Frequency Error, Time Error, or Inadvertent....with other Reliability Coordinators) shall contact other..."

Requirement IRO-005-0_R15 does include use of specific system for communication which can be deleted. Otherwise, there does not appear to be any need to modify these requirements as a result of implementation of Coordinate Operations standards.

7. Do you agree with modifying Reliability Standard TOP-005-0_R3 coincident with the implementation of the Coordinate Operations Standards?

Yes

No

Comments:

8. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the implementation of the set of Coordinate Operations Standards?

Yes

No

Comments:

9. Do you agree that 9 months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements and measures in this set of standards? If no, please identify any requirement or measure that you feel will require more than 9 months of preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments:

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

10. Do you have any other comments on these proposed standards?

Comments: Proposed effective date of Standard IRO-016-1 should be corrected to January 1, 2006. Reference to Reliability Standard TOP-009-1_R1 and TOP-009-1_R3 in Requirement R4 of Standard IRO-014-1 should be corrected to IRO-014-1_R1 and IRO-014-1_R3.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Linda Campbell	
Organization:	FRCC	
Telephone:	813-289-5644	
Email:	lcampbell@frcc.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
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 - Retire R2

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Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with modifying Reliability Standard COM-002-0_R2 and retiring COM-002-0_R2.1, R2.2, R2.3 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 2. Do you agree with modifying Reliability Standard EOP-002-0_R2 and retiring EOP-002-0_R4 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 3. The ‘concept’ contained in EOP-002-0_R9 is covered in proposed IRO-014-1_R1.1.2 and IRO-015-1_R1. EOP-002-0_9 requires the Reliability Coordinator to initiate an Energy Emergency Alert under certain conditions – IRO-014-1 and IRO-015-1 require the Reliability Coordinator to have an energy emergency plan and to make notifications to other Reliability Coordinators according to that energy emergency plan, but the proposed standards don’t include any specific references to use of the Energy Emergency Alerts. The Drafting Team recommends leaving EOP-002-0_R9 intact because removing that requirement would leave a ‘hole’ in EOP-002-0. Do you agree with the Drafting Team that EOP-002-0_R9 should remain in EOP-002-0?**

Yes

No

Comments: We support this as the declaration of an EEA is not necessarily only communication between RC's. It is important for the entities within a RC area to understand the EEA condition.

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4. **Do you agree with retiring IRO-003-0_R2 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

5. **Do you agree with retiring IRO-004-0_R6 and modifying IRO-004-0_R7 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

6. **Do you agree with modifying Reliability Standard IRO-005-0_R7, IRO-005-0_R9, IRO-005-0_R11, IRO-005-0_R12 and IRO-005-0_R15 coincident with the implementation of the Coordinate Operations Standards?**

Yes

No

Comments:

7. **Do you agree with modifying Reliability Standard TOP-005-0_R3 coincident with the implementation of the Coordinate Operations Standards?**

Yes

No

Comments: It should be retirement of TOP-005-0, R3 not modification.

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- 8. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the implementation of the set of Coordinate Operations Standards?**

Yes

No

Comments: I have not reviewed others with this in mind and am relying on the drafting teams review in this area.

- 9. Do you agree that 9 months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements and measures in this set of standards? If no, please identify any requirement or measure that you feel will require more than 9 months of preparation time and identify what will take longer and how much time you estimate is needed.**

Yes

No

Comments: It seems to be a reasonable time period

- 10. Do you have any other comments on these proposed standards?**

Comments: I support the implementation plan in general, however have commented on previous drafts of this standard about various needed changes that have still not been made. It appears that Draft 4 that is posted is the same as Draft 3 with only the name change from TOP to IRO and RA to RC.

I continue to have trouble with many of the measures identified in IRO-014-1 as they are the exact same things identified in the corresponding requirements. A measure should be a concise statement about how you will measure the requirement, not a regurgitation of the requirement itself. I think that measurements M1.1, M1.1.1-M1.1.6 should be deleted. Also, M1.2 should be changed to M2 to support R2 and measurements M1.2.1 and M1.2.2 should be deleted. By the same logic, M2 should change to M3 and delete measures M2.1-M2.3. I think M3 should be deleted altogether.

The measures in IRO-015-1 seem to be ok with the exception of M3. There is no requirement that states a RC has to keep track of when other RC's notify them of a condition. If this is important, perhaps M3 should be made as R4 instead.

The only comments the drafting team is looking for right now seems to be on the implementation plan. The industry really has not looked at this draft standard since mid 2004. I think the industry has more experience in what is expected in a requirement and a measure so would suggest perhaps

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asking for comment on the content of the standard one more time. Even though I support the changes to existing reliability standards and agree with the 9 month timeframe, if this were to go to ballot I would have to vote NO since I do not agree with the Measures and some of the areas in the compliance monitoring section as well.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti/Khaqan Khani	
Organization:	Independent Electricity System Operator (IESO)	
Telephone:	905-855-6187	
Email:	ron.falsetti@ieso.ca	
NERC Region		Registered Ballot Body Segment
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Yes

No

Comments:

- 2. Do you agree with modifying Reliability Standard EOP-002-0_R2 and retiring EOP-002-0_R4 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 3. The ‘concept’ contained in EOP-002-0_R9 is covered in proposed IRO-014-1_R1.1.2 and IRO-015-1_R1. EOP-002-0_9 requires the Reliability Coordinator to initiate an Energy Emergency Alert under certain conditions – IRO-014-1 and IRO-015-1 require the Reliability Coordinator to have an energy emergency plan and to make notifications to other Reliability Coordinators according to that energy emergency plan, but the proposed standards don’t include any specific references to use of the Energy Emergency Alerts. The Drafting Team recommends leaving EOP-002-0_R9 intact because removing that requirement would leave a ‘hole’ in EOP-002-0. Do you agree with the Drafting Team that EOP-002-0_R9 should remain in EOP-002-0?**

Yes

No

Comments:

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

- 4. Do you agree with retiring IRO-003-0_R2 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

- Yes
 No

Comments: We do not fully agree with the modification of IRO-003-0_R2 and its conversion to IRO-016-1_R1 as proposed. The IESO recommends requirement R1 of Standard IRO-016-1 be revise to include specific examples. We suggest the following revision in R1 ... " The Reliability Coordinator that identifies a potential, expected or actual problem such as but not limited to declining voltages, excessive reactive flows or an IROL violation, in a neighbouring Reliability Coordinator Area, it shall"

- 5. Do you agree with retiring IRO-004-0_R6 and modifying IRO-004-0_R7 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

- Yes
 No

Comments: The IRO-004-0_R7 should be modified by including few more specifics in IRO-014-1_R1. With regards to modifying IRO-004-R7, we suggest that the listing outlined in IRO-014-1_R1 section R1.1 pertaining to Operating procedures, Processes or Plans be qualified/expanded to include more specifics such as "addressing the potential SOL or IROL violation and an associated need to take any necessary actions"

- 6. Do you agree with modifying Reliability Standard IRO-005-0_R7, IRO-005-0_R9, IRO-005-0_R11, IRO-005-0_R12 and IRO-005-0_R15 coincident with the implementation of the Coordinate Operations Standards?**

- Yes
 No

Comments: re: IRO-005-0_R11 (IRO-016-1_R1). Standard IRO-005-0-R11 now being replaced with IRO-016-1:R1 generically covers a general statement but not the "specific requirements" for actions to be taken for any "Intercondition frequency deviations". We feel that a specific limit on Interconnection frequency deviation with a duration of time may be more appropriate; esp. for consistency and compliance purposes. We recommend that a clause/requirement similar to that outlined in Policy 9 requirement 4 should be added in

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IRO-016-1 R1 i.e. "INTERCONNECTION frequency error in excess of 0.03 Hz(eastern) for more than 20 minutes requiring a hotline conf call or initiating notification via RCIS.

re: IRO-005-0_R15 (IRO-016-1_R1) Similarly, the statements regarding "problems" in R1 of IRO-016-1 should be revised to include few specifics such as SOL or IROl violation, loss of reactive reservesetc)

7. Do you agree with modifying Reliability Standard TOP-005-0_R3 coincident with the implementation of the Coordinate Operations Standards?

Yes

No

Comments:

8. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the implementation of the set of Coordinate Operations Standards?

Yes

No

Comments: See comment in Q 6 above re:IRO-005-0_R11 (IRO-016-1_R1).

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Yes

No

Comments:

10. Do you have any other comments on these proposed standards?

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Comments: With regards to Standard IRO-014-1, we suggest that an entity should not be penalized with Level 4 for non-compliance with an administrative issue. The Level 4 is assigned due to a lack of up-to-date revision in documents which may not be appropriate. We suggest deleting the Level 4 statement and/or restricting this up to a maximum level of Level 2.

IRO-014-1 requirement R1.1.1 incorrectly refers RAs. It should be corrected to read "..... to be exchanged with other RCs"

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(Complete this page for comments from one organization or individual.)		
Name:	John Horakh - 08-02-2005	
Organization:	MAAC	
Telephone:	609-625-6014	
Email:	john.horakh@pepcoholdings.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input checked="" type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

Coordinate Operations Standard Drafting Team has considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Clean version of the 3rd draft of the Coordinate Operations Standards
- Implementation Plan
- Red Line version of Version 0 Standards recommended for retirement or revision

The Drafting Team feels that there is consensus on the content of these standards and wants to move the standards forward for balloting. As an interim step, the Standards Authorization Committee asked the Drafting Team to solicit feedback on its recommendations for retirement or revision of Version 0 standards and on the Implementation Plan. The Drafting Team is recommending the following changes to Version 0 Standards coincident with the implementation of the Coordinate Operations Standards:

- COM-002-0 Communications and Coordination
 - Modify R2; retire R2.1, R2.2, R2.3

- EOP-002-0 Capacity and Energy Emergencies
 - Modify R2; retire R4

- IRO-003-0 Reliability Coordination – Wide Area View
 - Retire R2

- IRO-004-0 Reliability Coordination – Operations Planning
 - Retire R6; modify R7

- IRO-005-0 Reliability Coordination – Current Day Operations
 - Modify R7, R9, R11, R12, R15

- TOP-005-0 Operational Reliability Information
 - Modify R3

The Coordinate Operations Standard Drafting Team’s Implementation Plan includes full compliance within 9 months from the effective date. Thus, if the Board of Trustees adopts the standards on November 1, the standards would become effective on January 1, 2006 and entities would have until October 1, 2006 to achieve full compliance.

The Drafting Team’s reasoning for the above recommendations are included in the Implementation Plan for this set of standards. Please read the Implementation Plan and respond to the questions to let the Drafting Team know if you support its recommendations.

Note that the Standards Authorization Committee directed the drafting team to change the term, ‘Reliability Authority’ to ‘Reliability Coordinator’ in this set of proposed standards. This change should make the standards easier to implement. In addition, the numbering of the standards was changed from the “TOP” prefix (Transmission Operations) to the “IRO” prefix (Interconnection Reliability Operations and Coordination).

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with modifying Reliability Standard COM-002-0_R2 and retiring COM-002-0_R2.1, R2.2, R2.3 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 2. Do you agree with modifying Reliability Standard EOP-002-0_R2 and retiring EOP-002-0_R4 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 3. The ‘concept’ contained in EOP-002-0_R9 is covered in proposed IRO-014-1_R1.1.2 and IRO-015-1_R1. EOP-002-0_9 requires the Reliability Coordinator to initiate an Energy Emergency Alert under certain conditions – IRO-014-1 and IRO-015-1 require the Reliability Coordinator to have an energy emergency plan and to make notifications to other Reliability Coordinators according to that energy emergency plan, but the proposed standards don’t include any specific references to use of the Energy Emergency Alerts. The Drafting Team recommends leaving EOP-002-0_R9 intact because removing that requirement would leave a ‘hole’ in EOP-002-0. Do you agree with the Drafting Team that EOP-002-0_R9 should remain in EOP-002-0?**

Yes

No

Comments:

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

- 4. Do you agree with retiring IRO-003-0_R2 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 5. Do you agree with retiring IRO-004-0_R6 and modifying IRO-004-0_R7 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 6. Do you agree with modifying Reliability Standard IRO-005-0_R7, IRO-005-0_R9, IRO-005-0_R11, IRO-005-0_R12 and IRO-005-0_R15 coincident with the implementation of the Coordinate Operations Standards?**

Yes

No

Comments: In the modification of IRO-005-0_R12, do not delete the word <impact>

In the modification for IRO-005-0_R15, do not delete the words <without delay>

- 7. Do you agree with modifying Reliability Standard TOP-005-0_R3 coincident with the implementation of the Coordinate Operations Standards?**

Yes

No

Comments:

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

8. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the implementation of the set of Coordinate Operations Standards?

Yes

No

Comments:

9. Do you agree that 9 months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements and measures in this set of standards? If no, please identify any requirement or measure that you feel will require more than 9 months of preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments: The answer is <yes> assuming the question meant to say <9 months beyond the effective date>

10. Do you have any other comments on these proposed standards?

Comments:

Comment Form – Coordinate Operations Drafting Team’s Proposed Implementation Plan & Recommended changes to Version 0 Standards

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 Do not use numbering or bullets in any data field.
 Do not use quotation marks in any data field.
 Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

Coordinate Operations Standard Drafting Team has considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Clean version of the 3rd draft of the Coordinate Operations Standards
- Implementation Plan
- Red Line version of Version 0 Standards recommended for retirement or revision

The Drafting Team feels that there is consensus on the content of these standards and wants to move the standards forward for balloting. As an interim step, the Standards Authorization Committee asked the Drafting Team to solicit feedback on its recommendations for retirement or revision of Version 0 standards and on the Implementation Plan. The Drafting Team is recommending the following changes to Version 0 Standards coincident with the implementation of the Coordinate Operations Standards:

- COM-002-0 Communications and Coordination
 - Modify R2; retire R2.1, R2.2, R2.3

- EOP-002-0 Capacity and Energy Emergencies
 - Modify R2; retire R4

- IRO-003-0 Reliability Coordination – Wide Area View
 - Retire R2

- IRO-004-0 Reliability Coordination – Operations Planning
 - Retire R6; modify R7

- IRO-005-0 Reliability Coordination – Current Day Operations
 - Modify R7, R9, R11, R12, R15

- TOP-005-0 Operational Reliability Information
 - Modify R3

The Coordinate Operations Standard Drafting Team’s Implementation Plan includes full compliance within 9 months from the effective date. Thus, if the Board of Trustees adopts the standards on November 1, the standards would become effective on January 1, 2006 and entities would have until October 1, 2006 to achieve full compliance.

The Drafting Team’s reasoning for the above recommendations are included in the Implementation Plan for this set of standards. Please read the Implementation Plan and respond to the questions to let the Drafting Team know if you support its recommendations.

Note that the Standards Authorization Committee directed the drafting team to change the term, ‘Reliability Authority’ to ‘Reliability Coordinator’ in this set of proposed standards. This change should make the standards easier to implement. In addition, the numbering of the standards was changed from the “TOP” prefix (Transmission Operations) to the “IRO” prefix (Interconnection Reliability Operations and Coordination).

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with modifying Reliability Standard COM-002-0_R2 and retiring COM-002-0_R2.1, R2.2, R2.3 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 2. Do you agree with modifying Reliability Standard EOP-002-0_R2 and retiring EOP-002-0_R4 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 3. The ‘concept’ contained in EOP-002-0_R9 is covered in proposed IRO-014-1_R1.1.2 and IRO-015-1_R1. EOP-002-0_9 requires the Reliability Coordinator to initiate an Energy Emergency Alert under certain conditions – IRO-014-1 and IRO-015-1 require the Reliability Coordinator to have an energy emergency plan and to make notifications to other Reliability Coordinators according to that energy emergency plan, but the proposed standards don’t include any specific references to use of the Energy Emergency Alerts. The Drafting Team recommends leaving EOP-002-0_R9 intact because removing that requirement would leave a ‘hole’ in EOP-002-0. Do you agree with the Drafting Team that EOP-002-0_R9 should remain in EOP-002-0?**

Yes

No

Comments:

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

- 4. Do you agree with retiring IRO-003-0_R2 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 5. Do you agree with retiring IRO-004-0_R6 and modifying IRO-004-0_R7 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 6. Do you agree with modifying Reliability Standard IRO-005-0_R7, IRO-005-0_R9, IRO-005-0_R11, IRO-005-0_R12 and IRO-005-0_R15 coincident with the implementation of the Coordinate Operations Standards?**

Yes

No

Comments:

- 7. Do you agree with modifying Reliability Standard TOP-005-0_R3 coincident with the implementation of the Coordinate Operations Standards?**

Yes

No

Comments:

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

8. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the implementation of the set of Coordinate Operations Standards?

- Yes
- No

Comments:

9. Do you agree that 9 months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements and measures in this set of standards? If no, please identify any requirement or measure that you feel will require more than 9 months of preparation time and identify what will take longer and how much time you estimate is needed.

- Yes
- No

Comments: With the number of agreements that the Reliability Coordinators will be required to execute, the subcommittee feels strongly that 9 months is not a sufficient length of time to complete this task. We recommend revising the implementation period to 12 months.

10. Do you have any other comments on these proposed standards?

Comments: It is this subcommittee's opinion that a Level 4 Non-Compliance should be reserved for those infractions that affect the reliability of the interconnected system. We do not feel that it's appropriate to have a Level 4 Non-Compliance for not having the most up to date version of a document. An example of this is the Level 4 non-compliance for procedures to support coordination between Reliability Coordinators Std, IRO-014-1. Therefore we believe that the Level 4 Non-Compliance for this standard should be deleted. An entity should not receive a Level 4 Non-Compliance for an administrative issue.

Several of these standards will require significant expenditures of manpower to implement. We feel that it's important to estimate the additional workload and value added prior to implementation.

There is a housekeeping issue that the SDT should be aware of: IRO-016-1; The Proposed effective Date at the top of the document show an effective date of January 1, 2005 and the footer of the document show a proposed effective date of January 1, 2006. The date at the top of the document needs to be corrected.

Comment Form – Coordinate Operations Drafting Team’s Proposed Implementation Plan & Recommended changes to Version 0 Standards

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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Calimano	
Organization:	NYISO	
Telephone:	518-356-6129	
Email:	Michael Calimano@NYISO.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

Coordinate Operations Standard Drafting Team has considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

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 - Retire R2

- IRO-004-0 Reliability Coordination – Operations Planning
 - Retire R6; modify R7

- IRO-005-0 Reliability Coordination – Current Day Operations
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- TOP-005-0 Operational Reliability Information
 - Modify R3

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Note that the Standards Authorization Committee directed the drafting team to change the term, ‘Reliability Authority’ to ‘Reliability Coordinator’ in this set of proposed standards. This change should make the standards easier to implement. In addition, the numbering of the standards was changed from the “TOP” prefix (Transmission Operations) to the “IRO” prefix (Interconnection Reliability Operations and Coordination).

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with modifying Reliability Standard COM-002-0_R2 and retiring COM-002-0_R2.1, R2.2, R2.3 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments: IRO-p14-1_R1 does not give specific guidance on what triggers are notification requirement and may lead to different interpretations. COM-002-0R2.1, R2.2, R2.3 offer some specific to conditions where the RC notifies other RC's. These specific conditions and additional notification trigger requirements should be added to IRO-p14-1_R1.

- 2. Do you agree with modifying Reliability Standard EOP-002-0_R2 and retiring EOP-002-0_R4 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 3. The ‘concept’ contained in EOP-002-0_R9 is covered in proposed IRO-014-1_R1.1.2 and IRO-015-1_R1. EOP-002-0_9 requires the Reliability Coordinator to initiate an Energy Emergency Alert under certain conditions – IRO-014-1 and IRO-015-1 require the Reliability Coordinator to have an energy emergency plan and to make notifications to other Reliability Coordinators according to that energy emergency plan, but the proposed standards don’t include any specific references to use of the Energy Emergency Alerts. The Drafting Team recommends leaving EOP-002-0_R9 intact because removing that requirement would leave a ‘hole’ in EOP-002-0. Do you agree with the Drafting Team that EOP-002-0_R9 should remain in EOP-002-0?**

Yes

No

Comments:

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

4. Do you agree with retiring IRO-003-0_R2 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.

Yes

No

Comments:

5. Do you agree with retiring IRO-004-0_R6 and modifying IRO-004-0_R7 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.

Yes

No

Comments:

6. Do you agree with modifying Reliability Standard IRO-005-0_R7, IRO-005-0_R9, IRO-005-0_R11, IRO-005-0_R12 and IRO-005-0_R15 coincident with the implementation of the Coordinate Operations Standards?

Yes

No

Comments:

7. Do you agree with modifying Reliability Standard TOP-005-0_R3 coincident with the implementation of the Coordinate Operations Standards?

Yes

No

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Comments:

- 8. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the implementation of the set of Coordinate Operations Standards?**

Yes

No

Comments:

- 9. Do you agree that 9 months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements and measures in this set of standards? If no, please identify any requirement or measure that you feel will require more than 9 months of preparation time and identify what will take longer and how much time you estimate is needed.**

Yes

No

Comments:

- 10. Do you have any other comments on these proposed standards?**

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Robert Williams	
Organization:	PacifiCorp	
Telephone:	(503) 251-5197	
Email:	robert_l.williams@pacificorp.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
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 - Modify R3

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Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with modifying Reliability Standard COM-002-0_R2 and retiring COM-002-0_R2.1, R2.2, R2.3 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 2. Do you agree with modifying Reliability Standard EOP-002-0_R2 and retiring EOP-002-0_R4 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 3. The ‘concept’ contained in EOP-002-0_R9 is covered in proposed IRO-014-1_R1.1.2 and IRO-015-1_R1. EOP-002-0_9 requires the Reliability Coordinator to initiate an Energy Emergency Alert under certain conditions – IRO-014-1 and IRO-015-1 require the Reliability Coordinator to have an energy emergency plan and to make notifications to other Reliability Coordinators according to that energy emergency plan, but the proposed standards don’t include any specific references to use of the Energy Emergency Alerts. The Drafting Team recommends leaving EOP-002-0_R9 intact because removing that requirement would leave a ‘hole’ in EOP-002-0. Do you agree with the Drafting Team that EOP-002-0_R9 should remain in EOP-002-0?**

Yes

No

Comments:

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

4. **Do you agree with retiring IRO-003-0_R2 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

5. **Do you agree with retiring IRO-004-0_R6 and modifying IRO-004-0_R7 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

6. **Do you agree with modifying Reliability Standard IRO-005-0_R7, IRO-005-0_R9, IRO-005-0_R11, IRO-005-0_R12 and IRO-005-0_R15 coincident with the implementation of the Coordinate Operations Standards?**

Yes

No

Comments:

7. **Do you agree with modifying Reliability Standard TOP-005-0_R3 coincident with the implementation of the Coordinate Operations Standards?**

Yes

No

Comments:

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

8. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the implementation of the set of Coordinate Operations Standards?

Yes

No

Comments:

9. Do you agree that 9 months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements and measures in this set of standards? If no, please identify any requirement or measure that you feel will require more than 9 months of preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments: Much of what is in the standard came from the current NERC Policies. The only difficulty I see would be in establishing agreements that may be required between the different entities.

10. Do you have any other comments on these proposed standards?

Comments: No additional comments.

Comment Form – Coordinate Operations Drafting Team’s Proposed Implementation Plan & Recommended changes to Version 0 Standards

Please use this form to submit comments on the Coordinate Operations Drafting Team’s proposed Implementation Plan and recommendations for retirement or revision to Version 0 Standards. Comments must be submitted by **August 8, 2005**. You must submit the completed form by emailing it to sarcomm@nerc.com with the words “Implementation Plan Coord Ops Standard Comments” in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or 609.452.8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

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 Do use punctuation and capitalization as needed (except quotations).
 Do use more than one form if responses do not fit in the spaces provided.
 Do submit any formatted text or markups in a separate WORD file.

- DO NOT: **Do not** insert tabs or paragraph returns in any data field.
 Do not use numbering or bullets in any data field.
 Do not use quotation marks in any data field.
 Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		

Comment Form – Coordinate Operations Drafting Team’s Proposed Implementation Plan & Recommended changes to Version 0 Standards

Group Comments (Complete this page if comments are from a group.)

Group Name: **Southern Company - Transmission**

Lead Contact: Marc M. Butts

Contact Organization: Southern Company Services

Contact Segment:

Contact Telephone: 205-257-4839

Contact Email: mmbutts@southernco.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Raymond Vice	Southern Company Services	SERC	1
Keith Calhoun	Southern Company Services	SERC	1
Jim Busbin	Southern Company Services	SERC	1
Jim Viikinsalo	Southern Company Services	SERC	1
Doug McLaughlin	Southern Company Services	SERC	1
Jim Griffith	Southern Company Services	SERC	1
Steve Corbin	Southern Company Services	SERC	1
Tim Swafford	Southern Company Services	SERC	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

Coordinate Operations Standard Drafting Team has considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Clean version of the 3rd draft of the Coordinate Operations Standards
- Implementation Plan
- Red Line version of Version 0 Standards recommended for retirement or revision

The Drafting Team feels that there is consensus on the content of these standards and wants to move the standards forward for balloting. As an interim step, the Standards Authorization Committee asked the Drafting Team to solicit feedback on its recommendations for retirement or revision of Version 0 standards and on the Implementation Plan. The Drafting Team is recommending the following changes to Version 0 Standards coincident with the implementation of the Coordinate Operations Standards:

- COM-002-0 Communications and Coordination
 - Modify R2; retire R2.1, R2.2, R2.3

- EOP-002-0 Capacity and Energy Emergencies
 - Modify R2; retire R4

- IRO-003-0 Reliability Coordination – Wide Area View
 - Retire R2

- IRO-004-0 Reliability Coordination – Operations Planning
 - Retire R6; modify R7

- IRO-005-0 Reliability Coordination – Current Day Operations
 - Modify R7, R9, R11, R12, R15

- TOP-005-0 Operational Reliability Information
 - Modify R3

The Coordinate Operations Standard Drafting Team’s Implementation Plan includes full compliance within 9 months from the effective date. Thus, if the Board of Trustees adopts the standards on November 1, the standards would become effective on January 1, 2006 and entities would have until October 1, 2006 to achieve full compliance.

The Drafting Team’s reasoning for the above recommendations are included in the Implementation Plan for this set of standards. Please read the Implementation Plan and respond to the questions to let the Drafting Team know if you support its recommendations.

Note that the Standards Authorization Committee directed the drafting team to change the term, ‘Reliability Authority’ to ‘Reliability Coordinator’ in this set of proposed standards. This change should make the standards easier to implement. In addition, the numbering of the standards was changed from the “TOP” prefix (Transmission Operations) to the “IRO” prefix (Interconnection Reliability Operations and Coordination).

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with modifying Reliability Standard COM-002-0_R2 and retiring COM-002-0_R2.1, R2.2, R2.3 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 2. Do you agree with modifying Reliability Standard EOP-002-0_R2 and retiring EOP-002-0_R4 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 3. The ‘concept’ contained in EOP-002-0_R9 is covered in proposed IRO-014-1_R1.1.2 and IRO-015-1_R1. EOP-002-0_9 requires the Reliability Coordinator to initiate an Energy Emergency Alert under certain conditions – IRO-014-1 and IRO-015-1 require the Reliability Coordinator to have an energy emergency plan and to make notifications to other Reliability Coordinators according to that energy emergency plan, but the proposed standards don’t include any specific references to use of the Energy Emergency Alerts. The Drafting Team recommends leaving EOP-002-0_R9 intact because removing that requirement would leave a ‘hole’ in EOP-002-0. Do you agree with the Drafting Team that EOP-002-0_R9 should remain in EOP-002-0?**

Yes

No

Comments:

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

4. Do you agree with retiring IRO-003-0_R2 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.

Yes

No

Comments:

5. Do you agree with retiring IRO-004-0_R6 and modifying IRO-004-0_R7 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.

Yes

No

Comments:

6. Do you agree with modifying Reliability Standard IRO-005-0_R7, IRO-005-0_R9, IRO-005-0_R11, IRO-005-0_R12 and IRO-005-0_R15 coincident with the implementation of the Coordinate Operations Standards?

Yes

No

Comments:

7. Do you agree with modifying Reliability Standard TOP-005-0_R3 coincident with the implementation of the Coordinate Operations Standards?

Yes

No

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Comments: Contractual agreements within the Reliability Area require the Reliability Coordinator to grant permission and access to various systems and then notify the owner of who is receiving data.

8. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the implementation of the set of Coordinate Operations Standards?

Yes

No

Comments: Not at this time.

9. Do you agree that 9 months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements and measures in this set of standards? If no, please identify any requirement or measure that you feel will require more than 9 months of preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments:

10. Do you have any other comments on these proposed standards?

Comments: No.

Comment Form – Coordinate Operations Drafting Team’s Proposed Implementation Plan & Recommended changes to Version 0 Standards

Please use this form to submit comments on the Coordinate Operations Drafting Team’s proposed Implementation Plan and recommendations for retirement or revision to Version 0 Standards. Comments must be submitted by **August 8, 2005**. You must submit the completed form by emailing it to sarcomm@nerc.com with the words “Implementation Plan Coord Ops Standard Comments” in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or 609.452.8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		

Comment Form – Coordinate Operations Drafting Team’s Proposed Implementation Plan & Recommended changes to Version 0 Standards

Group Comments (Complete this page if comments are from a group.)			
Group Name:		Operating Reliability Working Group (ORWG)	
Lead Contact:		Scott Moore	
Contact Organization:		Southwest Power Pool	
Contact Segment:		2	
Contact Telephone:		614-716-6600	
Contact Email:		spmoore@aep.com	
Additional Member Name	Additional Member Organization	Region*	Segment*
Mike Gammon	KCP&L	SPP	1
Allen Klassen	Westar	SPP	1
Serhiy Kotsan	Boston Pacific	NA	
Pete Kuebeck	OG&E	SPP	1
Scott Moore	AEP	SPP	1
Bill Nolte	SECI	SPP	1
Robert Rhodes	SPP	SPP	2
Bary Warren	EDE	SPP	1
Noman Williams	SECI	SPP	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

Coordinate Operations Standard Drafting Team has considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Clean version of the 3rd draft of the Coordinate Operations Standards
- Implementation Plan
- Red Line version of Version 0 Standards recommended for retirement or revision

The Drafting Team feels that there is consensus on the content of these standards and wants to move the standards forward for balloting. As an interim step, the Standards Authorization Committee asked the Drafting Team to solicit feedback on its recommendations for retirement or revision of Version 0 standards and on the Implementation Plan. The Drafting Team is recommending the following changes to Version 0 Standards coincident with the implementation of the Coordinate Operations Standards:

- COM-002-0 Communications and Coordination
 - Modify R2; retire R2.1, R2.2, R2.3

- EOP-002-0 Capacity and Energy Emergencies
 - Modify R2; retire R4

- IRO-003-0 Reliability Coordination – Wide Area View
 - Retire R2

- IRO-004-0 Reliability Coordination – Operations Planning
 - Retire R6; modify R7

- IRO-005-0 Reliability Coordination – Current Day Operations
 - Modify R7, R9, R11, R12, R15

- TOP-005-0 Operational Reliability Information
 - Modify R3

The Coordinate Operations Standard Drafting Team’s Implementation Plan includes full compliance within 9 months from the effective date. Thus, if the Board of Trustees adopts the standards on November 1, the standards would become effective on January 1, 2006 and entities would have until October 1, 2006 to achieve full compliance.

The Drafting Team’s reasoning for the above recommendations are included in the Implementation Plan for this set of standards. Please read the Implementation Plan and respond to the questions to let the Drafting Team know if you support its recommendations.

Note that the Standards Authorization Committee directed the drafting team to change the term, ‘Reliability Authority’ to ‘Reliability Coordinator’ in this set of proposed standards. This change should make the standards easier to implement. In addition, the numbering of the standards was changed from the “TOP” prefix (Transmission Operations) to the “IRO” prefix (Interconnection Reliability Operations and Coordination).

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with modifying Reliability Standard COM-002-0_R2 and retiring COM-002-0_R2.1, R2.2, R2.3 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 2. Do you agree with modifying Reliability Standard EOP-002-0_R2 and retiring EOP-002-0_R4 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 3. The ‘concept’ contained in EOP-002-0_R9 is covered in proposed IRO-014-1_R1.1.2 and IRO-015-1_R1. EOP-002-0_9 requires the Reliability Coordinator to initiate an Energy Emergency Alert under certain conditions – IRO-014-1 and IRO-015-1 require the Reliability Coordinator to have an energy emergency plan and to make notifications to other Reliability Coordinators according to that energy emergency plan, but the proposed standards don’t include any specific references to use of the Energy Emergency Alerts. The Drafting Team recommends leaving EOP-002-0_R9 intact because removing that requirement would leave a ‘hole’ in EOP-002-0. Do you agree with the Drafting Team that EOP-002-0_R9 should remain in EOP-002-0?**

Yes

No

Comments:

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

- 4. Do you agree with retiring IRO-003-0_R2 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 5. Do you agree with retiring IRO-004-0_R6 and modifying IRO-004-0_R7 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments: Not only does the proposed standard IRO-015-1, R2.1 require the Reliability Coordinators agree to the frequency of conference calls, but also requires that the calls be conducted at least weekly. This appears to be a conflict.

- 6. Do you agree with modifying Reliability Standard IRO-005-0_R7, IRO-005-0_R9, IRO-005-0_R11, IRO-005-0_R12 and IRO-005-0_R15 coincident with the implementation of the Coordinate Operations Standards?**

Yes

No

Comments:

- 7. Do you agree with modifying Reliability Standard TOP-005-0_R3 coincident with the implementation of the Coordinate Operations Standards?**

Yes

No

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Comments:

- 8. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the implementation of the set of Coordinate Operations Standards?**

Yes

No

Comments:

- 9. Do you agree that 9 months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements and measures in this set of standards? If no, please identify any requirement or measure that you feel will require more than 9 months of preparation time and identify what will take longer and how much time you estimate is needed.**

Yes

No

Comments:

- 10. Do you have any other comments on these proposed standards?**

Comments: Reliability Coordinator and Reliability Coordinator Area should be capitalized throughout the proposed standard.

IRO-014-1 R4 incorrectly refers to TOP-009-1 R1 and TOP-009-1 R3.

Delete the "ext" in the parenthetical phrase in IRO-015-1 M3.

The Proposed Effective Date for IRO-016-1 is incorrectly shown as Jaanuary 1, 2005.

The data retention requirements are not consistent throughout the proposed standard. IRO-014-1 and IRO-016-1 require evidence be maintained for the prior year and the current calendar

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

year yet IRO-015-1 requires auditable documentation be maintained for a rolling 12-month period. Shouldn't these requirements be the consistent throughout the proposed standard?

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 Do not use quotation marks in any data field.
 Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Kathleen A. Davis	
Organization:	Tennessee Valley Authority	
Telephone:	423-751-6172	
Email:	kadavis@tva.gov	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
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<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		

Comment Form – Coordinate Operations Drafting Team’s Proposed Implementation Plan & Recommended changes to Version 0 Standards

Group Comments (Complete this page if comments are from a group.)

Group Name:
 Lead Contact:
 Contact Organization:
 Contact Segment:
 Contact Telephone:
 Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*
Stuart Goza	TVA		

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

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 - Retire R6; modify R7

- IRO-005-0 Reliability Coordination – Current Day Operations
 - Modify R7, R9, R11, R12, R15

- TOP-005-0 Operational Reliability Information
 - Modify R3

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Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with modifying Reliability Standard COM-002-0_R2 and retiring COM-002-0_R2.1, R2.2, R2.3 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 2. Do you agree with modifying Reliability Standard EOP-002-0_R2 and retiring EOP-002-0_R4 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 3. The ‘concept’ contained in EOP-002-0_R9 is covered in proposed IRO-014-1_R1.1.2 and IRO-015-1_R1. EOP-002-0_9 requires the Reliability Coordinator to initiate an Energy Emergency Alert under certain conditions – IRO-014-1 and IRO-015-1 require the Reliability Coordinator to have an energy emergency plan and to make notifications to other Reliability Coordinators according to that energy emergency plan, but the proposed standards don’t include any specific references to use of the Energy Emergency Alerts. The Drafting Team recommends leaving EOP-002-0_R9 intact because removing that requirement would leave a ‘hole’ in EOP-002-0. Do you agree with the Drafting Team that EOP-002-0_R9 should remain in EOP-002-0?**

Yes

No

Comments:

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

- 4. Do you agree with retiring IRO-003-0_R2 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 5. Do you agree with retiring IRO-004-0_R6 and modifying IRO-004-0_R7 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 6. Do you agree with modifying Reliability Standard IRO-005-0_R7, IRO-005-0_R9, IRO-005-0_R11, IRO-005-0_R12 and IRO-005-0_R15 coincident with the implementation of the Coordinate Operations Standards?**

Yes

No

Comments:

- 7. Do you agree with modifying Reliability Standard TOP-005-0_R3 coincident with the implementation of the Coordinate Operations Standards?**

Yes

No

Comments:

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

8. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the implementation of the set of Coordinate Operations Standards?

Yes

No

Comments:

9. Do you agree that 9 months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements and measures in this set of standards? If no, please identify any requirement or measure that you feel will require more than 9 months of preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments:

10. Do you have any other comments on these proposed standards?

Comments: