

Summary Consideration: The drafting team did not make any changes to FAC-012 or FAC-013 as a result of comments submitted with the re-ballot of these standards.

Company	Balloter	Ballot	Comments
Carolina Power & Light Company CPL	Verne Ingersoll II	Negative	Transfer Capabilities as a defined term is not the responsibility of the RC. Transfer Capability is determined by the Transmission Planners through regional and interregional coordination studies and by the Transmission Operators/Providers in the operating time frame. The fact that some RCs are also Transmission Operators/Planners may confuse this issue.
Response: Response: This set of standards does not assume any particular corporate model. The applicability is assigned to the RC and PA in support of the requirement addressing inter and intra-regional Transfer Capabilities (on a wide area view as defined in the functional model). The RC and PA may delegate the development of this methodology or the development of the associated Transfer Capabilities to others.			
Hydro-Quebec HQT	MICHEL ARMSTRONG	Negative	The preballot posting appeared as one package of coordinated standards with associated implementation plan. The ballot shows this package has been split into three sets of two standards each and the industry hasn't been afforded the time to determine if the implementation plan is still valid or if there are no interrelationships of the standards that exist, making the individual sets valid if they passed and were stand alone.
Response: As these standards were developed, they were reviewed on an individual basis so that balloters should already be familiar with the content and interdependencies. The reliability standards process is still a new process, and just because the Version 0 standards were balloted as a whole, this should not set a precedent that all sets of standards must be balloted as a whole. The drafting team does agree that if new standards have interdependencies, then those sets of interdependent standards should be balloted as a 'set' rather than individually. This is what the drafting team attempted to do in combining the ballot for FAC-008 with the ballot for FAC-009; and in combining the ballot for FAC-010 with that for FAC-011, etc.			
Nebraska Public Power District NPPD	Alan Boesch	Negative	To get consistent results throughout the Region the transfer capability methodology should be determined by the Regional Reliability Organization not the Reliability Coordinator. The TSP and the Reliability Coordinator will not necessarily have the same footprint. The transfer capability should be calculated by the TSP using the Regional methodology.
Response: The RCs could delegate this task to the RRO. This standard does not preclude this type of delegation. The RRO, if deemed appropriate, could require that all its RCs have a common methodology.			
New York Power Authority NYPA	Ralph Rufrano	Negative	Nypa's no vote is in support of the comments provided by the NYSRC with regard to the proposed standards.
Response: Please see the response to NYSRC's comments.			

Consideration of Comments on 1st Re-ballot of FAC-012 and FAC-013

New York State Electric and Gas Corporation NYET	Henry G Masti	Negative	See comments of NYSRC
Response: Please see the response to NYSRC's comments.			
South Carolina Electric & Gas Company SCEG	Lee N Xanthakos	Negative	The current draft standard required the Reliability Coordinator and Planning Authority to each document their current methodologies used for developing its inter-regional and intra-regional Transfer Capabilities. Reliability Coordinators need not play a role in development of these methodologies (unless they are also registered as the Planning Authority). The standard should be reworded as follows: The Planning Authority shall document its current methodology used for developing its inter-regional and intra-regional Transfer Capabilities (Transfer Capability Methodology). This rewording should be carried forward throughout the standard.
Response: During the development of these standards, stakeholders commented on the appropriateness of the applicability of the requirements and most stakeholders supported assigning these requirements to both the RC and the PA. The RC and PA may delegate responsibility for these tasks to other entities.			
Midwest Independent Transmission System Operator, Inc.	Terry Bilke	Affirmative	Please see our comments from the previous ballot.
<p><i>Here are your comments from the previous ballot and the drafting team's response to those comments:</i></p> <p>Comment: We had some problems voting in the affirmative for this standard. There is significant discussion and confusion in the industry on who and what the Planning Authority is. Also, there are level 3 and 4 violations for administrative requirements.</p> <p>Response: The SAC directed the drafting teams to move forward without waiting for the functional model to be revised. Although level 3 and 4 appear to be administrative, they hit at the intent of the standard – if the methodology wasn't distributed, it has no use and it is the same as if it had not been developed.</p>			
New York State Reliability Council	Alan Adamson	Negative	<p>The New York State Reliability Council (NYSRC) has voted NO on proposed Standards FAC-008-1, 009-1, 012-1, and 013-1 because of the concerns addressed below.</p> <p>1. There are interrelations and dependencies between the three groups of DFR standards, and we therefore believe that it was inappropriate that they were split up for balloting purposes. For example, the Transfer Capability standard requires that "Transfer Capabilities must respect all applicable System Operating Limits (SOLs)". If the Transfer Capability standards were adopted without the SOL standards (FAC-010-1 and FAC-011-1), there would be no NERC SOL methodology standard basis for</p>

		<p>determining Transfer Capabilities. While it is true that today the Regions may have their own SOL requirements, NERC has no compliance review requirements for such Regional requirements. Further, certain Regional SOL requirements may not require Category C Contingency assessments that we believe are required to avoid excessive Transfer Capabilities (see our comments on FAC-010-1 and FAC-011-1).</p> <p>2. Implementation Plan. There is no indication of how NERC would revise the DFR implementation plan if only one or two of the DFR groups were adopted.</p> <p>3. Lack of Review Time. Because of NERC's last minute voting group change there was insufficient time for the NYSRC to completely review the above two issues. Also, the NYSRC was unable to provide NY voting entities balloting recommendations in time for their vote (see item #4 below). If the decision to ballot the DFR standards in three groups had been made a few weeks earlier, the NYSRC would have had time to carefully consider these issues.</p> <p>4. Process Concerns. We believe that NERC's last minute announcement on October 4, 2005, the first day of balloting - to ballot the six DFR standards in three groups instead of one group, as previously announced - was unacceptable. We believe that this action either violated NERC's own standard development procedure, or if not, circumvented the intent of the process. If the latter was the case, the NYSRC recommends that NERC revise its standards development process manual to prevent such inappropriate actions from re-occurring in the future. Also, there is a 30-day pre-ballot review period within the standards development process. This review gives stakeholders an opportunity to closely scrutinize the final posting and propose voting strategies to other organizations. The last minute announcement on October 4 undermined and confused the NYSRC voting recommendations that had been developed prior to October 4. The reason NERC waited until the first day of balloting to announce the three DFR balloting groups was never explained and remains to us a mystery.</p>
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Response: 1. The drafting team does not see where the standards (FAC-008 through FAC-012) must all be implemented at the same time. While FAC-0012 does require that the Transfer Capability methodology developed ensure that SOLs are not exceeded, SOLs are developed and exist today and should be respected in the development of Transfer Capabilities, even if the proposed standard for the development of an SOL methodology is not approved. The reliability standards process is still a new process, and just because the Version 0 standards were balloted as a whole, this should not set a precedent that all sets of standards must be balloted as a whole. The drafting team does agree that if new standards have interdependencies, then those sets of interdependent standards should be balloted as a 'set' rather than individually. This is what the drafting team attempted to do in combining the ballot for FAC-008 with the ballot for FAC-009; and in combining the ballot for FAC-010 with that for FAC-011,

Consideration of Comments on 1st Re-ballot of FAC-012 and FAC-013

etc. FAC-008 and FAC-009 are basic and surely could move forward without any of the other standards in this series.

2. The implementation plan doesn't include any cross references between standards and therefore does not need to be modified if only one or two of the DFR sets of standards were adopted.

3. The Standards Process Manual does not address this area, however as per the implementation plan there are no cross references between the standards that should preclude approving one set with or without the other sets of standards.

4. The Standards Process Manual does not address this area and we do not believe there has been any violation of the process.

Northeast Power Coordinating Council	Edward Schwerdt	Negative	The Determine Facility Ratings, Operating Limits and Transfer Capabilities Standards were developed and reviewed by the industry as a package. The separation of these proposed standards at ballot time does not afford the industry the opportunity to assess the potential impact that split votes could have on the underlying technical interrelationships or implementation plans.
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Response: As these standards were developed, they were reviewed on an individual basis so that balloters should already be familiar with the content and interdependencies. The reliability standards process is still a new process, and just because the Version 0 standards were balloted as a whole, this should not set a precedent that all sets of standards must be balloted as a whole. The drafting team does agree that if new standards have interdependencies, then those sets of interdependent standards should be balloted as a 'set' rather than individually. This is what the drafting team attempted to do in combining the ballot for FAC-008 with the ballot for FAC-009; and in combining the ballot for FAC-010 with that for FAC-011, etc.

Western Electricity Coordinating Council	Louise McCarren	Affirmative	While the Interconnection Wide Regional Differences identified in FAC-010-1 adequately reflect the more stringent requirements in the Western Interconnection, that for the good of the industry and the sake of reliability, Individual Regions and the Standards Drafting Team should consider modifying the requirements of the NERC Standard to require the consideration of credible multiple element contingencies, similar to those identified in the Western Interconnection Wide Regional Differences, in establishing System Operating Limits.
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Response: This comment is not relevant to this ballot which is for FAC-008 and FAC-009 but will be considered with FAC-010.

Florida Power Corporation FPC	Lee G Schuster	Negative	The applicability to RC and RA assumes an RTO structure. The applicability needs to be revised to provide for applicability to Transmission Operators and Transmission Planners. These entities perform transfer capability studies in non-RTO areas through various regional reliability organizations.
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Response: This set of standards does not assume an RTO structure – these standards were written without the assumption of any particular corporate model. The applicability is assigned to the RC and PA in support of the requirement addressing inter and intra-regional Transfer Capabilities (on a wide area view as defined in the functional model). An RTO is a type of organization that may perform this function.

The RC and PA may delegate the development of this methodology to others. The RC and PA are required functions regardless of the organizational structure.

Consideration of Comments on 1st Re-ballot of FAC-012 and FAC-013

MidAmerican Energy Company MEC	Thomas C. Mielnik	Affirmative	I fail to see the reliability benefits in requiring parties who post methodology to respond within 45 days to comments. I have voted yes in spite of my concern.
<p>Response: The intent in setting a timeframe was to ensure that the timeframe was short enough that the comments would not linger without attention for too long, while also being long enough to provide the developer of the methodology an opportunity to research the validity of the comments.</p>			
Nebraska Public Power District NPPD	Timothy Artt	Negative	To get consistent results throughout the Region the transfer capability methodology should be determined by the Regional Reliability Organization not the Reliability Coordinator.
<p>Response: The RCs could delegate this task to the RRO. This standard does not preclude this type of delegation. The RRO, if deemed appropriate, could require that all its RCs have a common methodology.</p>			
Niagara Mohawk NMPC	Michael Schiavone	Negative	The ballot shows this package has been split into three sets of two standards each and the industry hasn't been afforded the time to determine if the implementation plan is still valid or if there are no interrelationships of the standards that exist, making the individual sets valid if they passed and were stand alone.
<p>Response: As these standards were developed, they were reviewed on an individual basis so that balloters should already be familiar with the content and interdependencies. The reliability standards process is still a new process, and just because the Version 0 standards were balloted as a whole, this should not set a precedent that all sets of standards must be balloted as a whole. The drafting team does agree that if new standards have interdependencies, then those sets of interdependent standards should be balloted as a 'set' rather than individually. This is what the drafting team attempted to do in combining the ballot for FAC-008 with the ballot for FAC-009; and in combining the ballot for FAC-010 with that for FAC-011, etc.</p>			
South Carolina Electric & Gas Company SCEG	Hubert Young	Negative	FAC-012-1 & FAC-013-1 are inconsistent with the Functional Model Version 2. The functional Model states that Transmission Service Providers are the "Responsible Entity" for determining and posting available transfer capability (ATC) values. These standards reassign these tasks to Reliability Coordinators and Planning Authorities. Also, the boundaries of Reliability Coordinators and Planning Authorities may NOT align with interregional and intraregional boundaries where Transfer Capabilities are calculated. Again, Transmission Service Provider boundaries are more appropriate.
<p>Response: Determining ATC values is a responsibility assigned to the TSP under the Functional Model, however ATC values and Transfer Capabilities are two different terms with two different meanings:</p> <p>ATC: A measure of the transfer capability remaining in the physical transmission network for further commercial activity over and above already committed uses. ATC is defined as the Total Transfer Capability (TTC), less the Transmission Reliability Margin (TRM), less the sum of existing transmission commitments (which includes retail customer service) and the Capacity Benefit Margin (CBM).</p> <p>Transfer Capability: The measure of the ability of interconnected electric systems to move or transfer power <i>in a reliable manner</i> from one area to another over all transmission lines (or paths) between those</p>			

Consideration of Comments on 1st Re-ballot of FAC-012 and FAC-013

<p>areas under specified system conditions. The units of transfer capability are in terms of electric power, generally expressed in megawatts (MW). The transfer capability from "Area A" to "Area B" is <i>not</i> generally equal to the transfer capability from "Area B" to "Area A."</p>			
Grant County PUD No.2 GCPD	Kevin John Conway	Negative	<p>This standard empowers the Reliability Coordinator up and above what authority he is given through our current agreements with the Reliability Coordinator. These agreements were crafted carefully to represent the laws which govern our organization in the State of Washington. We empower the Reliability Coordinator to act on our behalf, this set of standards does not allow for contractual exceptions. We do not blindly follow the direction of the Reliability Coordinators, but take "good faith" direction, from them. We then take "good faith" action to impliment the directive. Additionally, IRO-013-1 R1 must include language that allows exemption for environmental, or endangered species issues. These issues do not neatly fit into the catagories described. Failure to honor or even consider these committments could be disasterous.</p>
<p>Response: This comment is not relevant to any of the standards addressed by this set of ballots: FAC-008 through FAC-013.</p>			
Progress Energy - Carolinas	Wayne Lewis	Negative	<p>The applicability to RC and RA assumes an RTO structure. The applicability needs to be revised to provide for applicability to Transmssion Operators and Transmission Planners. These entities perform transfer capability studies in non-RTO areas through various regional reliability organizations .</p>
<p>Response: This set of standards does not assume an RTO structure – these standards were written without the assumption of any particular corporate model. The applicability is assigned to the RC and PA in support of the requirement addressing inter and intra-regional Transfer Capabilities (on a wide area view as defined in the functional model). An RTO is a type of organization that may perform this function. The RC and PA may delegate the development of this methodology to others. The RC and PA are required functions regardless of the organizational structure.</p>			
Sacramento Municipal Utility District SMUD	E. Nick Henery	Affirmative	See Comments from last Vote
<p><i>Here are your comments from the previous ballot and the drafting team's response to those comments:</i></p> <p>Comment: The Interconnection Wide Regional Differences identified in FAC-010-1 adequately reflect the more stringent requirements in the Western Interconnection, that for the good of the industry and the sake of reliability, the Standards Drafting Team consider modifying the requirements of the NERC Standard to require the consideration of credible multiple element contingencies, similar to those identified in the Western Interconnection Wide Regional Differences, in establishing System Operating Limits.</p> <p>Response: This comment is not relevant to this ballot which is for FAC-012 and FAC-013 but will be considered with FAC-010.</p>			

Consideration of Comments on 1st Re-ballot of FAC-012 and FAC-013

California Energy Commission	William Mitchell Chamberlain	Affirmative	While the Interconnection Wide Regional Differences identified in FAC-010-1 adequately reflects the more stringent requirements in the Western Interconnection, for the good of the industry and the sake of reliability, the Standards Drafting Team should consider modifying the requirements of the NERC Standard to require the consideration of credible multiple element contingencies, similar to those identified in the Western Interconnection Wide Regional Differences, in establishing System Operating Limits.
Response: Response: This comment is not relevant to this ballot which is for FAC-008 and FAC-009 but will be considered with FAC-010.			