

Determine Facility Ratings, Operating Limits, and Transfer Capabilities

<i>SAR Commenter Information</i>			
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Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is <input type="checkbox"/> The scope of the SAR should be expanded to include: <input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: any aspect that goes beyond establishing specific reliability criteria to be incorporated into the determination of facility ratings, operating limits, and transfer capabilities. Other comments: Only Total Transfer Capability and Transmission Reliability Margin should be discussed. Available Transmission Capacity and Capacity Benefit Margin are market/commercial issues and should not be included in any NERC Organization Standard.			

SAR Commenter Information

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Is there a reliability-related need for an Organization Standard to be developed on this topic?

Yes No

Yes No The scope of the SAR is fine as it is

The scope of the SAR should be expanded to include:

The scope of the SAR should be reduced to eliminate:

Other comments: The purpose/industry need section should start with: The purpose of this standard is to ensure that a consistent, uniformly applied standard is developed ...

<i>SAR Commenter Information</i>	
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: The establishment of this SAR is premature. All commercial implications of the SAR should be identified and mitigated prior to the drafting.</p>	

SAR Commenter Information	
Name	Phil Park
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<p>Look at the SAR called: Determine Facility Ratings, Operating Limits, and Transfer Capabilities:</p> <p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: The Purpose of this standard requires the following changes:</p> <ol style="list-style-type: none"> 1. Purpose, first para, last sentence, revise as follows: If these operating security limits are violated and a disturbance occurs, the system could sustain widespread or unacceptable outages or equipment could incur severe damage. 2. Purpose, second para, third sentence, revise as follows: The total transfer capability (TTC) of a section of the power system is the amount of MW transfer that can be allowed while continuing to operate within equipment and electric system thermal, voltage and stability limits. <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: Calculation of ATC is a business practice, not a core reliability standard. This SAR should be limited to addressing determination of TTC.</p> <p>Other comments I am recommending that the phrase "while continuing to operate within equipment and electric system thermal, voltage and stability limits" be transferred from SAR #1. This is to ensure that the system not only be planned to adhere to these limits, but also be operated to these limits. By including these performance requirements in the planning SAR, there is only an inference that the system must also be operated to certain performance standards (i.e. system operated as planned). However, by including them in the standard for establishing transfer capabilities, it is clear that the system must also be operated to meet these standards. Since planners have to plan a system that can be operated, there is no loss, from a planning point of view, if the performance standards are associated with transfer capabilities. Furthermore, if the performance standards are associated with planning, this permits a disconnect between planning and operations in that allows planners to meet standards that may not be acceptable to operators.</p> <p>Also, much of the "Purpose" statement of this SAR should be moved to "Description".</p>	

<i>SAR Commenter Information</i>			
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is <input type="checkbox"/> The scope of the SAR should be expanded to include: <input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: This standard must carefully define what is meant by 'limits' particularly what is meant by an Operating Security Limit. There must be a effort to clearly distinguish between the violation of a limit that has no impact on interconnected system operations, and the violation of a limit that threatens the security of that interconnected system.</p> <p>Same comment submitted for Operating to transmission Limits.</p>			

<i>SAR Commenter Information</i>	
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: Common terminology should be used throughout the SARs. If the term "operating limits" is used, a definition is needed. The use of "operating limits" is confusing when past standards have used other terminology such as Operating Security Limits and Operating Security Limit Violations. This standard should address the definition of the terminology used, whether "operating limits" or "Operating Security Limits."</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: TSP and Transmission Operator should be added to the list of applicable functions.</p>	

<i>SAR Commenter Information</i>			
Name	Alan Johnson		
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: the section covering Facility Ratings. Industry standards already exist (e.g. ANSI, IEEE, NEMA, etc) which address equipment design limits and ratings.			
Other comments:			
This standard must be careful to recognize engineering driven regional differences.			

April 23, 2002

SRP Comments on NERC 11 SAR sent out on April 2, 2002.

All 11 SAR's (this group of 10 plus the one sent out earlier) don't contain enough information to make the kind of judgments requested on the forms. Therefore the forms are not filled out.

We recommend all the SAR's be advanced to the next step to develop the specific standards and associated measurements for each standard so that we can evaluate and comment on them.

All of these SAR's are needed for reliable planning and operation of the bulk electric transmission system and meet the principle requirements.

Comments on the White paper:

1. The paper fails to state what standards are supposed to be. This seems so basic; one has to assume that those drafting the white paper want to redefine the definition contained in the Organizational Standards Manual. This leads to a lot of confusion and is not the place to do that.
2. The Planning Standards were written in a different time period than the Operating Policies with different objectives. Thus they are different and that should be recognized. For instance the development of a Planning Functional model has absolutely nothing to do with whether control areas exist or not and whether companies have restructured or not. The statement about control areas may be true for the Operating Policies but it is not true for the Planning Standards.

The Planning Standards (Templates) were written to meet the definition of a standard in the Organizational Standards Manual, to meet at least one of the Reliability Principles, to comply with all the Market Interface Principles and to contain the compliance administration elements. This is very different than what is contained in the Operating Policies. The Planning Standards need to go through the new process so that both the Operating elements and Planning elements of the Organizational Standards are consistent, are not duplicative and are needed for reliability.

3. The term "core reliability requirement" is used in the white paper but is never mentioned in the Organizational Standards Manual. Using an undefined term is very misleading and should be avoided.
4. The paper in several places address "what performance must be achieved". As noted above, an Organizational Standard can be broader than that and this write up is misleading.
5. The process has been lengthened because of the multiple posting of the SAR's. NERC has a body of reliability requirements written up into Compliance Templates. With very little effort these could be written up into SAR's that would provide sufficient detail for NERC to evaluate them. It is very hard to comprehend why one does not use this work to expedite the process. Instead SAR's are sent out with insufficient information. The process is long enough. We should be looking for all ways possible to speed it up.

Comments on the SAR write-up:

1. The SAR write-up only contains the purpose and brief description of a standard. Where is the Standard? I thought that is what the SAR is for?
2. The descriptions are in most cases extremely vague. The write-ups contain words like "such as" or "as defined in the standard". These are big enough to cover a MAC truck. Once again there is insufficient information to make a good judgment.



April 29, 2002

Guy V. Zito
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RE: NEPOOL Compliance Working Group (NCWG) comments pertaining to the 10 Standard Authorization Requests (SARs) posted for open comment

The NCWG has reviewed the 10 SARs posted for open comment and has agreed they are core standards, which serve a purpose in support of reliability.

Standard Title:

Prepare for and Respond to Abnormal or Emergency Conditions
Prepare for and Respond to Blackout or Island Conditions
Coordinate Interchange
Coordinate Operations
Monitor and Analyze Disturbances, Events and Conditions
Operate Within Limits – Monitor and Assess Short-term Transmission
Define (Physical) Connection Requirements
Design, Install, and Coordinate Control Protection Systems
Assess Transmission Future Needs and Develop Transmission Plans
Determine Facility Ratings, Operating Limits, and Transfer Capabilities

We do not agree that the **SAR Type** is a new standard. We suggest that at a minimum the SAR should indicate the existing standard and whether or not it will be withdrawn when the revised standard is adopted. We suggest that NERC stop the open process of reviewing existing policies and standards if these Organizational Standards will replace them. NERC should clearly indicate that one purpose of the Organizational Standards Process is to replace existing standards.

Sincerely,
Daniel L. Stosick

Chairman, NEPOOL Compliance Working Group
C/o ISO New England, Inc.
One Sullivan Road
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Cc: NEPOOL Compliance Working Group
CP9 Working Group
Paul Shortly
Richard Burke
Richard Kowalski

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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>	
Name	Mr. Charles Moser (Northborough, MA) and Mr. Ronald Halsey (Syracuse, NY)
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: The standard should simply require that the Regions establish facility ratings, operating limits and transfer capabilities as required to meet the transmission system performance levels as defined in the standard above.</p> <p>Other comments: The standard should be broad based enough to allow the Regions the freedom to define such ratings and limits to meet their particular Regional requirements.</p>	

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<i>SAR Commenter Information</i>			
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>			
Name	Paul Rocha		
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<p>HL&P is concerned about the co-mingling of these inter-related concepts. Facility ratings are a necessary component of determining transfer capabilities, but facility ratings are also a necessary component of assessing transmission future needs and developing transmission plans. Facility ratings are largely addressed by IEEE and ANSI standards, and there is no value in having a NERC standard that further addresses this topic.</p> <p>Regarding operating limits and transfer capabilities, HL&P believes there may be value to a NERC standard for those areas not governed by a RTO. Ideally, transfer capabilities would be determined by one central authority modeling, monitoring, and assessing the entire transmission grid. That can be done, and is done, in ERCOT. ERCOT does not use concepts found in the current NERC Standards, such as electronic tagging or Capacity Benefit Margin. All transactions are scheduled through ERCOT, and ERCOT determines transfer capabilities by performing security assessments and monitoring the system in real time¹. Therefore, for areas such as ERCOT, there is no need for a NERC standard addressing these topics. However, in other areas, a NERC standard addressing transfer capabilities may be useful. For such areas, if a standard is developed, we support ERCOT's comments regarding the appropriate scope and characteristics of such standards.</p> <p>¹ It is important to note that, unlike some other systems, the ERCOT organization models and monitors the entire network, so there is no possibility of "loop flows" or other external factors that can affect grid reliability.</p>			

¹ It is important to note that, unlike some other systems, the ERCOT organization models and monitors the entire network, so there is no possibility of "loop flows" or other external factors that can affect grid reliability.

<i>SAR Commenter Information</i>			
Name	Brant Eldridge		
Organization	ECAR		
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<p>ECAR has conducted a survey of its member companies regarding the eleven SARs, which NERC has initiated to-date. We recognize that the comment period for the first SAR issued ("Balance Resources and Demand") has already closed. However, considering that the first SAR was issued earlier than the other ten primarily just to get the process started, and further considering that all 11 SARs are viewed by NERC as a possible complete set of Organization Standards (re: the "White Paper"), ECAR believes that comments on the first SAR should still be considered along with those on the other ten.</p> <p>11 of the 18 ECAR Full Members, along with two Associate Members, submitted responses to the SAR survey. Some of the responses were submitted using the NERC "SAR Comment Form", while others were contained in narrative e-mails, and one was faxed to us. Therefore, a complete set of the ECAR member company responses will be sent to the Standards Process Manager at NERC via Fed Ex to arrive at NERC by May 3rd. The Fed Ex package will include a copy of this e-mail. FYI, NERC may also receive some of the ECAR member company responses directly from the companies. Some of the individual company responses will be identical to what will be in the Fed Ex package and some will contain more detailed comments.</p> <p>The ECAR member company responses contain numerous and wide-ranging comments about the need for each of the 11 proposed Organization Standards, as well as comments regarding the scope and applicability of the SARs. As your review of these responses will show, there is general ECAR consensus – but not unanimity -- that the 11 SARs as a set cover the scope of performance needed to ensure reliability of the interconnected North American bulk power systems. Some ECAR members feel that there are performance areas not covered in the proposed set of Organization Standards, and they have provided what they think is missing. Others believe that some of the proposed Organization Standards are not needed, and they explain why they feel that way. Numerous comments were directed at the scope and applicability of the SARs. Several ECAR companies questioned the inclusion of the "Distribution Provider" function in the applicability section of the SARs, believing that NERC should stick to its traditional focus on the bulk power systems and stay out of the distribution arena.</p> <p>The recent call for nominees to serve on SAR Drafting Teams is the appropriate next step. ECAR believes that all 11 SARs need to be refined to reflect industry comments and then posted again for another round of industry comments. Before proceeding into actual development of Organization Standards based on these 11 SARs, NERC must have clear industry consensus on the need for each of the Organization Standards outlined in the 11 SARs, as well as consensus on the scope and applicability of those SARs.</p> <p>If the wide-ranging comments received from ECAR members are any indication, there is still some serious work to be done to achieve the needed clear industry consensus on how to proceed.</p>			

<i>SAR Commenter Information</i>			
Name	David L. Hart		
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is <input type="checkbox"/> The scope of the SAR should be expanded to include: <input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: Not sure if correct entites are listed in the "applies to" area. It has transmission owner but under RTO would it not seem more appropriate to have it apply to the operator or service provided instead of the owner. Surely the RTO would want some continuity across the different systems that they control. Already MISO has raised concerns about the different way ATC is calculated, why would ratings and transfer capabilities also not be a concern?</p>			

<i>SAR Commenter Information</i>			
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>	
Name	David W. Sandefur
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p>Other comments: The Transmission Service Provider functional area should be included in this Standard since it will be the user of much of the data on an AFC/ATC determination basis. Also, the Distribution Provider functional area should be removed from this Standard since NERC standards should continue to focus on regional or larger scale reliability issues. To reach down to the distribution level will broaden the scope significantly and unnecessarily.</p>	

<i>SAR Commenter Information</i>	
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: Common terminology should be used throughout the SARs. If the term "operating limits" is used, a definition is needed. The use of "operating limits" is confusing when past standards have used other terminology such as Operating Security Limits and Operating Security Limit Violations. This standard should address the definition of the terminology used, whether "operating limits" or "Operating Security Limits."</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: TSP and Transmission Operator should be added to the list of applicable functions.</p>	

<i>SAR Commenter Information</i>	
Name	Charles Yeung
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<i>SAR Commenter Information</i>	
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: More details to judge whether or not all reliability related activities are covered or not.</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: The purpose and description is too general. This standard may require to be split into two or more standards. For example, determination and usage of transfer capability require a standard by itself.</p>	

<i>SAR Commenter Information</i>			
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<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>	
Name	John K. Loftis, Jr.
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E-mail	john_loftis@dom.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: System Operating Limits and Transfer Capabilities</p> <p>Other comments: As currently written, this SAR is too broad, combining both planning and operating issues. It is recommend that this SAR be revised to address only Facility Ratings, and be retained in the "Transmission Adequacy" category.</p> <p>The subject of "Transfer Capability" applies to both planning and operations. Each transmission system should be planned to allow for transfers in various directions. Perhaps a separate SAR titled "Planning for Transfer Capability" should be created and included in the "Transmission Adequacy" category. A third SAR covering transfer capability from the operations side could be combined with System Operating Limits and included in the "Transmission Reliability and Resource Balance" category, or combined with existing SAR # 6, which is already in that category.</p>	

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<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>	
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments:</p> <p style="padding-left: 40px;">This SAR is really a requirement to establish facility ratings, operating limits and transfer capabilities. We view the contents of this SAR to be one of the "how"s for meeting the renamed Organization Standard "Operate Within Limits - Monitor and Assess Short-Term Transmission". As such, it does not rise to the level of "core reliability" Organization Standard.</p> <p>Each transmission owner, operator and provider should be required to have in place processes for the determination of facility ratings, operating limits and transfer capabilities. "How" those are developed should be specified by the owners, operators and providers.</p>	

<i>SAR Commenter Information</i>			
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<p>Other comments: To the extent that this SAR is transitioning an existing standard from the old world to the new world (Functional Model), then the standard should not go beyond the original scope. Consistent with our general comments, once the clarity is achieved on Standard Market Design and RTO formations, then this standard should be revisited and reevaluated.</p> <p>One consideration in the development of the new standard would be that the specific facilities ratings will be set by Transmission Owners and should be subject to RTO implementation, which is consistent with FERC's Standard Market Design Order.</p>			

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Other comments: Scope is too broad to ascertain exactly what this standard will require. Does it require entities to have published rating methodologies or just publish ratings? It is difficult to determine appropriateness of this SAR and scope due to the broad scope of the description, therefore none of the above boxes were checked.			

<i>SAR Commenter Information</i>			
Name	Jim Griffith		
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None			

<i>SAR Commenter Information</i>	
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: (1) Should the use of operating guides be addressed in this standard?</p> <p>Should the transmission operator, if different from the transmission owner, play a role in determining operating limits?</p> <p>Under "Applicable Reliability Principles", wouldn't #1, "Interconnected bulk electric systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions," apply? It would seem to be important that the different TSP's use the same transfer capability ratings between the two of them to determine AFCs.</p> <p>(2) This SAR is a little puzzling because it seems that Transfer Capabilities are awkwardly tagged onto it. It seems like it might fit better under assessing the system and possibly under emergency conditions. Also, while ratings are important there are numerous other modeling data assumptions that affect the determination of how the system will perform. For example, what rules should be followed for including future changes in generation, load, reinforcements, and transactions? What assumptions should be made about determining the resistance of a conductor? It's not certain that all of these issues apply just to this SAR, they probably apply to others as well.</p> <p>(3) It is unclear how the Distribution Provider would be included under this SAR.</p>	

<i>SAR Commenter Information</i>	
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: The determination of facility ratings should be in a separate SAR from determining operating limits and transfer capabilities. Facility ratings are directly related to evaluation of equipment design, performance, and operating conditions. The operating limits and transfer capabilities are more concerned with the analysis of transmission system models and operating practices of the transmission owner/operator. Maintaining separation would provide appropriate scope for each standard and avoid confusion on the interrelationship of these issues.</p>	

<i>SAR Commenter Information</i>			
Name	David Little		
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>	
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<i>SAR Commenter Information</i>		
Name	Compliance Subcommittee	
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<i>SAR Commenter Information</i>	
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<i>SAR Commenter Information</i>			
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<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>	
Name	Gary Won and Don Tench Comments submitted on behalf of the Independent Electricity Market Operator (IMO)
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>The SAR must be rigorously tested against the White Paper requirements to specify what performance must be achieved rather than how to achieve it.</p> <p>Other comments:</p> <p>To the extent that standard terminology can be used for equipment, voltage and transfer limits, this would be beneficial and should facilitate the implementation of this standard. This appears to require some of the criteria currently used in the NPCC documents A-2 and A-3 and the IMO supports this.</p>	

<i>SAR Commenter Information</i>	
Name	David Scarpignato
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E-mail	scarp@bge.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is <input type="checkbox"/> The scope of the SAR should be expanded to include: <input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: The promulgation for comment of these SARs is premature. The industry "standard making process" is in a transition phase and it is overly burdensome to devote resources at this time. Once legislation or FERC firmly determines which entity(ies) is responsible for standards it will make sense to move forward with said entity.</p> <p>Even if NERC wants to cover reliability standards, almost all standards have a reliability and commercial impact; thereby, necessitating developing a single process that incorporates both commercial and reliability aspects of standards development. The current NERC process risks being changed soon, discounts commercial aspects, and is not part of a finalized overall industry process.</p> <p>Waiting a short while to move forward on a new standards setting process is acceptable and prudent given that NERC standards are currently in place and the industry can continue to use these standards until the new process and standards setting organization(s) are firmly set.</p>	

<i>SAR Commenter Information</i>	
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<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is	

<i>SAR Commenter Information</i>	
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Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is	

<i>SAR Commenter Information</i>	
Name	Kent Saathoff
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Comments	
<p>This SAR and the other posted SARs provide an appropriate framework for transitioning existing NERC Operating Policies and Planning Standards into new, NERC Organization Standards. Multiple compliance measures may be defined and developed for each of the eleven proposed Organization Standards. The Organization Standards and related compliance measures should focus on what functions must be performed for reliability, on who is responsible for each compliance measure for each required function and not, on how the compliance measure is achieved. The compliance measure must be measurable or demonstrable to ensure compliance.</p> <p>There should be a Standard that requires owners of electric facilities to establish ratings of their equipment and provide that information to Reliability and Planning Authorities. That data is essential for those authorities to perform their functions that are necessary for system reliability. However, exact compliance measures on how those ratings should be determined are probably not practical due to numerous types of equipment, design, manufacturers and owner requirements.</p> <p>Similarly there should be a standard requiring determination of system operating limits and transfer capabilities. However, the standard should focus on who (which function) is responsible and what should be determined, not how the limits should be determined.</p>	

<i>SAR Commenter Information</i>	
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: Facility ratings and Transfer Capabilities are diverse enough to require separate standards. This is especially true in regions where Transfer capabilities are limited by Transient Stability concerns.</p> <p>Other comments: This SAR should define a need for a properly documented and consistently applied rating methodology document. The elements to be included in this document should be flexible enough to address region specific requirements. The use of the term "etc." in the SAR description leaves the scope of this SAR open-ended. The scope of the SAR should be stated and complete.</p>	

<i>SAR Commenter Information</i>			
Name	Linda Clarke		
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Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is <input type="checkbox"/> The scope of the SAR should be expanded to include: <input type="checkbox"/> The scope of the SAR should be reduced to eliminate: Other comments: This SAR needs to provide measurable requirements for the limits that are being proposed.			

<i>SAR Commenter Information</i>			
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: The definitions of Operating Limits and Operating Limit Violations.			

<i>SAR Commenter Information</i>	
Name	Warren Schaefer
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: Facility ratings and Transfer Capabilities are diverse enough to require separate standards. This is especially true in regions where Transfer capabilities are limited by Transient Stability concerns.</p> <p>Other comments: This SAR should define a need for a properly documented and consistently applied rating methodology document. The elements to be included in this document should be flexible enough to address region specific requirements. The use of the term "etc." in the SAR description leaves the scope of this SAR open-ended. The scope of the SAR should be stated and complete.</p>	

<i>SAR Commenter Information</i>	
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: Common terminology should be used throughout the SARs. If the term "operating limits" is used, a definition is needed. The use of "operating limits" is confusing when past standards have used other terminology such as Operating Security Limits and Operating Security Limit Violations. This standard should address the definition of the terminology used, whether "operating limits" or "Operating Security Limits."</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: TSP and Transmission Operator should be added to the list of applicable functions.</p>	

<i>SAR Commenter Information</i>			
Name	Jim Griffith		
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<i>SAR Commenter Information</i>	
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	Fax (205) 257-1040
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<p><i>Is there a reliability-related need for an Organization Standard to be developed on this topic?</i></p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>The scope of the SAR is fine as it is</i></p> <p><input checked="" type="checkbox"/> <i>The scope of the SAR should be expanded to include:</i></p> <p>The scope of this SAR is once again poorly stated. The scope uses the term “transfer capabilities” which really applies to TTC, ATC, CBM etc... and interface related measurements and indicators. These subjects are presently covered in the I.E. Standards are should not be addressed in a SAR concerning facility ratings. The facility rating subject is addressed in the II.C. Standard and covers only transmission and not generation. If the intention is to include internal plant generation facilities, a new SAR should be written to address these subjects separate from transmission facilities. It is recommended that the II.C Standard be used as a template for the development of the standard associated with this SAR. The II.C Standard has proven to be a very functional standard.</p> <p>If operational planning is to be included in the standard associated with this SAR then there needs to be provisions that provide for dynamic ratings.</p>	

<i>SAR Commenter Information</i>	
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: In general, the principles are all right. But defining facility limits is a risk-based decision, which is not easily taken away from the facility owner/investor. If there should be a standard rating methodology, it should include parameters which allow owners to reasonably and consistently adjust the level of risk they are willing to accept, unless system operators are willing to assume the risk and pay damages as necessary. Revenues can be devised which incent facility owners to accept risk (e.g. FGRs for transmission owners).</p>	

<i>SAR Commenter Information</i>	
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: To insure that a competitive market in the electric industry has the the ability to expand, we need industry wide standards that will create a common ground of definition and application in the detemination of facility ratings, operating limits, and transfer capabilities. Currently, our industry lacks wide area concensus on the definition and application of criteria in these areas. This lack of concensus does not maximize the ability of the transmission system to facilitate a market driven industry. Transfer capabilities between control area to control area, or RTO to RTO, needs to be more clearly defined and standardized. As the footprint of operations expand and cover a larger sector of potential opprtunities, a need for standard equipment ratings become a necessity. A standard that would incorporate a common definition of facility ratings, limits, and transfer capabilities would enhance the operations and usage of the electric grid.</p>	

<i>SAR Commenter Information</i>			
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Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is <input type="checkbox"/> The scope of the SAR should be expanded to include: <input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: Other comments: The standard should be separated into two pieces: 1) Determine Facility Ratings and 2) Determine Operating Limits and Transfer Capabilities. The reason is that Facility Ratings deal with specific pieces of equipment and Operating Limits/Transfer Capabilities deal with multiple pieces of equipment.			

<i>SAR Commenter Information</i>			
Name	Kenneth A. Githens		
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The scope of the SAR should be reduced to eliminate: System Operating Limits and Transfer Capability are based on facilities ratings. System Operating Limits and Transfer Capability limits have a direct impact on the available capacity on the transmission system for the market. This standard should be developed in a process which takes into account market and reliability interests.			

<i>SAR Commenter Information</i>	
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: This SAR should be divided into two SAR's:</p> <ol style="list-style-type: none"> 1. Facility Ratings (to be applicable to Transmission Owner, Distribution Provider and Generator Functions) Function and, 2. Development of Operating Limits and Transfer Capability (to be applicable to Reliability Authority Function) <p>Also, if "Transfer Capability" extends into planned systems, then, we will need to add Planning Authority to Item 2.</p>	

<i>SAR Commenter Information</i>			
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<i>SAR Commenter Information</i>			
Name	Ed Riley		
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Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is <input type="checkbox"/> The scope of the SAR should be expanded to include: <input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: Other comments: This Standard should be used only to set a standardized method for determining transfer capabilities. "Transmission Operator" should be added to the Reliability Functions that this Organizational Standard would apply to.			

<i>SAR Commenter Information</i>	
Name	Mr Paul Tremblay, Mr. Mike Penstone, and Mr Ajay Garg
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: The standard should identify (a) the accountabilities to establish facility ratings, operating limits and transfer capabilities to meet transmission system performance levels as defined in the standard above, and (b) the need to share this information</p> <p>Other comments: The standard should be broad and allow the Regions/RTO/owners the freedom to define equipment ratings and/or limits to meet their requirements.</p>	

<i>SAR Commenter Information</i>	
Name	Marv Landauer
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: Modify second sentence of the Description to "Facilities included in the standard shall be those that affect TRANSFER CAPABILITY" not RELIABILITY. The last sentence should be reduced to "to adhere to established limits such as voltage, thermal or frequency limits" and remove the reference to power transfer limits, thermal and stability limits.</p> <p>Other comments: The intent of the facility rating portion of this standard should not be to dictate to equipment owners how to rate their equipment. The owners have the liability for these facilities and should retain the responsibility to rate individual facilities.</p>	

<i>SAR Commenter Information</i>	
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SAR Commenter Information	
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No THE INTENT OF THIS STANDARD IS UNCLEAR SUCH THAT WE CANNOT DETERMINE IF THERE IS A NEED</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: Transmission Operators: They have a responsibility to define operating limits and therefore the standard should apply to them</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: In Reviewing the Distribution Provider and Generator responsibilities in the Functional Model, neither has any responsibility indicated for the activities identified in the SAR. Why therefore would this standard be applied to them?</p> <p>Other comments: The SAR indicates that this standard would apply to Generators and Distribution Providers. Today NERC Policy and Standards do not apply to these Functions. For example, NERC has no authority to require its standards to be applied to determine ratings for distribution facilities. And the application of NERC standards to Independent Generators are carried out by transmission owners through interconnection agreements. Is NERC proposing that this will change and they will begin to impose standards directly on distribution providers and generators? What is intended here is simply not clear.</p> <p>There is inadequate detail in the SAR to determine if the scope of the SAR is appropriate and adequate. Is it intended that the standard would be that facility rating, operating limits and transfer capabilities must be established and documented? If so that would be appropriate. Also, at a minimum this should be at least three SARs, if any, one for facility ratings, one related to operating limits, one for transfer capabilities. Further, it is this SAR that should begin the definition of the “predefined system reliability requirements.”</p>	

<i>SAR Commenter Information</i>	
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<p>Is there a reliability-related need for an Organization Standard to be developed on this topic? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: This SAR should be divided into two SAR's:</p> <p>1. Facility Ratings (to be applicable to Transmission owner, Distribution provider, and Generator Function) and,</p> <p>2. Development of Operating limits and transfer capability (Applicable to Reliability Authority Function) Question: Is transfer capability the same as Path Rating? If so, Planning Authority will also be responsible.</p>	

<i>SAR Commenter Information</i>	
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<i>SAR Commenter Information</i>			
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: The determination of generation capability.			

<i>SAR Commenter Information</i>			
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Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

